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Live Webinar: American Rescue Plan Act Reporting and Accounting Update

January 12, 2022



Participating in the Webinar

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questions or
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Today's Speakers



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Key Changes

Key Changes from the Interim Final Rule to the Final Rule:

- Treasury has expanded the non-exhaustive list of uses that recipients can use to respond to COVID-19 and its economic impacts. This includes clarifying that recipients can use funds for certain capital expenditures to respond to public health and economic impacts and making services like childcare, early education, addressing learning loss, and affordable housing development available to all communities impacted by the pandemic.
 - Treasury has expanded support for public sector hiring and capacity.
 - Treasury has streamlined options to provide premium pay for essential workers.
 - Treasury has broadened eligible water, sewer, and broadband infrastructure projects – understanding the unique challenges facing each state and locality in delivering clean water and high-speed broadband to their communities.
 - Treasury has simplified the program for small localities seeking revenue recapture through the option to elect a standard allowance of \$10 million for revenue loss rather than calculating revenue loss through the full formula.



Reporting Lost Revenue

The final rule offers a standard allowance for revenue loss of \$10 million, allowing recipients to select between a standard amount of revenue loss or complete a full revenue loss calculation. Recipients that select the standard allowance may use that amount – in many cases their full award – for government services, with streamlined reporting requirements.

Public Health and Economic Impacts

In addition to programs and services, the final rule clarifies that recipients can use funds for capital expenditures that support an eligible COVID-19 public health or economic response. For example, recipients may build certain affordable housing, childcare facilities, schools, hospitals, and other projects consistent with final rule requirements.

The final rule provides an expanded set of households and communities that are presumed to be “impacted” and “disproportionately impacted” by the pandemic, thereby allowing recipients to provide responses to a broad set of households and entities without requiring additional analysis. Further, the final rule provides a broader set of uses available for these communities as part of COVID19 public health and economic response, including making affordable housing, childcare, early learning, and services to address learning loss during the pandemic eligible in all impacted communities and making certain community development and neighborhood revitalization activities eligible for disproportionately impacted communities.

The final rule allows for a broader set of uses to restore and support government employment, including hiring above a recipient’s pre-pandemic baseline, providing funds to employees that experienced pay cuts or furloughs, avoiding layoffs, and providing retention incentive

Premium Pay

The final rule delivers more streamlined options to provide premium pay, by broadening the share of eligible workers who can receive premium pay without a written justification while maintaining a focus on lower-income and frontline workers performing essential work.



Water, Sewer & Broadband

The final rule significantly broadens eligible broadband infrastructure investments to address challenges with broadband access, affordability, and reliability, and adds additional eligible water and sewer infrastructure investments, including a broader range of lead remediation and stormwater management projects



Required US Treasury Reports

1. Interim Report
2. Project Expenditure Report (Key Topic for Today)
3. Recovery Plan Performance Report

Key Reporting Dates

1. Interim Report

- August 31, 2021
- Not Required by Non-Entitlement Units

2. Project Expenditure Report (Key Topic for Today)

- Entitlement Units \$10+ Million – January 31, 2022 (Then Quarterly)
- Entitlement Units Below \$10 Million / Non-Entitlement Units – April 30, 2022 (Then Annually)

3. Recovery Plan Performance Report

- Recipients with Populations Exceeding 250,000 – August 31, 2021 (Then Annually)
- Not required for jurisdictions below 250,000



Project & Expenditure Report Content

1. Project General Information
2. Expenditure Detail
3. Project Status
4. Adopted Budget
5. Demographic Detail (After April 2022)



Project & Expenditure Report Content

6. Subaward Detail
7. Civil Rights Compliance
8. Ineligible Activities (States & US Territories Only)
9. Programmatic Data
10. Non-Entitlement Unit Specific Data

Setting the Foundation for Reporting

- Upfront Data Gathering Best Practices and Key Principles
- Documentation & Compliance – Foundation for Record Keeping
- Informed Decision Making
- Avoidance of Fraud, Waste and Abuse
- Project Intake Form
 - View a Sample Project Intake Form by Visiting the City of Poughkeepsie’s American Rescue Plan Act Portal:
<https://cityofpoughkeepsiearp.org>