



Q&A from NATaT Webinar

Below is a list of questions from the NATaT webinar on the Coronavirus State and Local Fiscal Recovery Fund (CSLFRF) included in the American Rescue Plan Act (ARPA), which provides funding to states and units of local government to help stem the impact of the COVID-19 pandemic. NATaT staff answered as many questions as possible based on the current information and guidance from Treasury. These answers are recommendations only and have not been vetted by Treasury. There are several questions that would benefit from clarification from Treasury and/or recommendations to Treasury for eligibility. NATaT is submitting comments to Treasury, but also encourages state organizations and individual towns/townships to do so. [Comments are due July 16, 2021.](#)

- ❖ “NEU” stands for “Non-entitlement Unit of Local Government.” NEUs are generally local governments with a population under 50,000 whose allocation will run through the state.
- ❖ A link to Treasury’s Interim Final Rule can be found [here](#); a link to Treasury’s Frequently Asked Questions (FAQs) document can be found [here](#); and a link to FAQs for distribution of funds to NEUs can be found [here](#).

Question	Answer
General/Logistics	
Previous correspondence from the Wisconsin Towns Association has said we don’t need a SAMs account as that is for municipalities over 50,000 population. Information from Department of Revenue says we do need a	Original guidance from Treasury did not require NEUs to obtain a SAM account; however, they changed their guidance and are now requiring a

<p>SAMs account. I've tried a couple of times to navigate the SAMs website, to no success. Do we need as SAMs account? Our population is 5,085.</p>	<p>SAM account. So, yes, all recipients must have a SAM account. NEUs must obtain one by the first reporting deadline of October 31, 2021.</p>
<p>Our town is building a sand/salt shed and the cost has gone up tremendously because of COVID. Can those funds be used to offset the increase in cost?</p>	<p>You can use recovery funds for the provision of government services to the extent of your town's reduction in revenue due to the COVID-19 pandemic. To help calculate revenue loss, NATaT is sharing two calculators. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>What are the cut off dates beginning and ending for APRA fund spending?</p>	<p>Funds can be spent upon receipt and must be obligated by December 31, 2024. Funds must be expended by December 31, 2026.</p> <p>Note- funds can be used for costs incurred from March 3, 2021, through December 31, 2024 (except premium pay for essential employees can be retroactive to January 27, 2020).</p>
<p>How and where do we submit public comments to the Treasury Department?</p>	<p>Comments should be made online by July 16, 2021, and the link to submit comments is here. Click on the blue "Comment" box. You can also review other comments at this link.</p>
<p>Do small townships need SAMs and CAGE numbers?</p>	<p>You only need a SAM account and DUNS number. Cage numbers are assigned with your SAM account.</p>
<p>Should recovery funds go into a separate bank account?</p>	<p>It is not required. All recipients must have a bank account enabled for Automated Clearing House (ACH) direct deposit. Note, these can be interest-bearing accounts and you can use the interest income however you like.</p>
<p>Can the funds be put into an interest-bearing bank account, with the town earning the interest?</p>	<p>Yes.</p>
<p>I did the SAM registration but am having some trouble with a "Cage" ID. Is the "Cage" ID required for this or just the SAM registration?</p>	<p>You only need a SAM account and DUNS number. FYI - Cage numbers can be found here.</p>
<p>What is the definition of "obligation"? (Funds need to be "obligated" by 12/31/24) What is the definition of "operating Budget"? Are enterprise funds part of "operating budget"? Are special revenue funds part of</p>	<p>"Obligation" means an order placed for property and services and entering into contracts, subawards, and similar payments that require payment.</p>

<p>“operating budget”. Can you verify whether costs incurred for public health are limited to those incurred after 3/3/21 since most expenses in this area were incurred prior to 3/3/21.</p>	<p>“Operating budget” – See recently released budget information for NEUs.</p> <p>Verified: these funds are for expenses incurred after March 3, 2021.</p>
<p>Can the state keep the money not used or are they required to give it to the NEUs that are using it?</p>	<p>If an NEU’s total allocation is more than 75 percent of the NEU’s budget, the State must return the excess amount to Treasury.</p> <p>If an NEU declines the funds or is deemed unresponsive, those funds are reallocated to participating NEUs (provided the total distribution is not more than 75% of the recipient’s budget). States cannot retain these funds.</p>
<p>Do NEUs’ governing bodies need to pass a resolution authorizing the acceptance of funds or authorizing the Manager to accept the funds?</p>	<p>The federal government does not require this; however, state law might require local action.</p>
<p>If a village is part of a larger township, does the village get their own funds and the township get separate funds?</p>	<p>Each recipient is determined by Treasury.</p>
<p>When can we expect to receive the guidelines from the state to process requests for payments? I realize the state has received guidelines from the federal treasury; I am asking about the guidelines from the state to NEUs.</p>	<p>Each state will define their own process and timeline so long as they follow federal guidelines. A state has 30 days to distribute the money once they receive it from the federal government. Extensions can be requested by a state.</p> <p>Guidelines for states linked here.</p>
<p>Should we use revenue reported on out F65?</p>	<p>Need clarification from Treasury and/or your state administering agency.</p>
<p>What is the definition of general infrastructure?</p>	<p>For purposes of CSLFRF, water, sewer, and broadband infrastructure are allowable uses of funds, as are improvements to critical public safety facilities. Further, broader infrastructure projects are allowed in areas that were disproportionately impacted by the pandemic (or located in a Qualified Census Tract) and to the extent of a community’s loss in revenue.</p> <p>General infrastructure would include roads, bridges, building construction, installation/maintenance of utilities, etc.</p>

What is the cut-off date to apply for these funds?	Check with your state budget office, or whichever the administering agent of NEU funds is in your state. However, states must give NEUs 60 days to request funds once the state have received the NEU allocations.
You said we could cover costs incurred before 03/02/21, how far back can you go?	These funds only cover costs incurred after March 3, 2021, except that premium pay for essential workers can go back to January 27, 2020.
We are a Township with 3 villages. We are receiving all of the funding. Do we trust decision, or do we have to monitor that too?	As the recipient, you are responsible for ensuring the funds are used in accordance with Treasury guidelines.
How are villages treated given that their residents are also Township residents?	Some villages will receive a direct allocation or allocation through the state.
How are the contacting the NEU's? Is it through the POC information on Sam.gov?	We assume "yes". Contact your state administering agency to confirm.
If Treasury is not "approving" projects on a case by case basis, who do we run all these ideas by to give indication it is appropriate?	You will need use Treasury guidance and FAQs to make your best determination.
Response to Public Health and Negative Economic Impacts	
Can we use the money to expand the cemetery?	<p>This would be allowed in areas that were disproportionately impacted by the pandemic (or located in a Qualified Census Tract) and to the extent of the community's loss in revenue.</p> <p>If you require more space at the cemetery due to COVID-related deaths, there is an argument to be made, but you may want clarification from Treasury.</p>
What about expanding a transfer station due to increased garbage due to people at home?	<p>This would be allowed in areas that were disproportionately impacted by the pandemic (or located in a Qualified Census Tract) and to the extent of the community's loss in revenue.</p> <p>Sanitation equipment is an eligible use but expanding the transfer station may require clarification from Treasury.</p>

<p>Our town rents space for our equipment with other tenants. The town has decided to purchase land and build a building so our employees do not have to share space with other people. Could this cost be covered?</p>	<p>If you can show that the reason behind building the new space is to ensure adequate social distancing. Otherwise, this would be an eligible government service to the extent of the community's loss in revenue.</p>
<h2 style="color: #0070C0;">Revenue Loss</h2>	
<p>We lost state revenue sharing in 2020. Can we restore these dollars to our Treasury?</p>	<p>Replenishing financial reserves (e.g., rainy day or other reserve funds) would not be considered provision of a government service, since such expenses do not directly relate to the provision of government services. Any revenue lost is determined by the revenue loss calculation. See Revenue Loss calculator.</p>
<p>We lost revenue over the last year due to COVID because we had to cancel town events. How can these losses be captured and reimbursed?</p>	<p>See Revenue Loss calculator.</p>
<p>What if you lost no revenue during COVID?</p>	<p>Revenue loss can be calculated at four points in time: December 31, 2020, December 31, 2021, December 31, 2022, and December 31, 2023. The calculation assumes at least a 4.1% growth adjustment for each year. So, even if you lost no funding, you could still see a "revenue loss" due to the 4.1% assumed annual growth rate.</p>
<p>Can we use APRPA 'NEU' funds to pay for the 'Single Audit' that will be required?</p>	<p>Yes. Note, the Single Audit Act requires that all non-federal entities that expend more than \$750,000 in federal awards in a year are required to obtain an audit.</p>
<h2 style="color: #E67E22;">Fire/EMS</h2>	
<p>Would we be able to purchase and install fire numbers for our Town because the fire department and ambulance crews have problems locating addresses? Would we be able to purchase SCBA's (Self Contained Breathing Apparatus) to replace outdated ones that our firefighters certainly need?</p>	<p>This would be an eligible government service to the extent of the community's loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>

<p>My township contracts with the county sheriff's department, we provide the police cars and are due to purchase a new one, can the money be used for that?</p>	<p>This would be an eligible government service to the extent of the community's loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>Can we purchase turnout gear for out fire department with these funds?</p>	<p>This would be an eligible government service to the extent of the community's loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>Do radio upgrades for fire and EMS qualify?</p>	<p>This would be an eligible government service to the extent of the community's loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>Are ambulances eligible?</p>	<p>This would be an eligible government service to the extent of the community's loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>Can we purchase air packs for the fire department?</p>	<p>This would be an eligible government service to the extent of the community's loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>We are part of a joint Municipal Fire Department, and they are buying a new fire engine. Can we use the funds to pay for our portion of the fire engine?</p>	<p>This would be an eligible government service to the extent of the community's loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>Can we purchase a new fire truck with the funds?</p>	<p>This would be an eligible government service to the extent of the community's loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>Can general operating costs of providing EMS services be paid for with the funds even if not able to show a loss of revenue?</p>	<p>This would be an eligible government service to the extent of the community's loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>Will this cover GIS Mapping system and programs needed to do a reappraisal? Can we also use the money to do a reappraisal?</p>	<p>This would be an eligible government service to the extent of the community's loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>

<p>We pay a retainer fee for our fire department and ambulance service per year can this be used for that also?</p>	<p>This would be an eligible government service to the extent of the community’s loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>What we need related to recovery, is dollars to create a law enforcement presence to handle the overwhelming amount of people moving into our area from the cities.</p> <p>We also need a new ambulance to handle increased capacity. Are these allowable expenditures under ARPA?</p>	<p>This would be eligible if you are in an area disproportionately impacted by the pandemic or if you are in a Qualified Census Tract.</p> <p>This would be an eligible government service to the extent of the community’s loss in revenue.</p>
<p>Parks and Tourism</p>	
<p>Can the money be used for parks and parks improvements?</p>	<p>This would be eligible if you are in an area disproportionately impacted by the pandemic or if you are in a Qualified Census Tract.</p> <p>This would be an eligible government service to the extent of the community’s loss in revenue.</p> <p>Many communities experienced significantly increased use of parks during the pandemic that resulted in damage or increased maintenance needs. The Interim Final Rule recognizes that “decrease[s to] a state or local government’s ability to effectively administer services” can constitute a negative economic impact of the pandemic. See 2.18 on page 10.</p>
<p>If we are able to use funds for a public beach/ park are their certain guidelines on what equipment we are allowed to purchase?</p>	<p>No guidelines on equipment.</p>
<p>Rapid movement into the suburbs due to WAH and COVID increased demands on parks and trails. Can we fund the expansion of these services?</p>	<p>This would be eligible if you are in an area disproportionately impacted by the pandemic or if you are in a Qualified Census Tract.</p> <p>This would be an eligible government service to the extent of the community’s loss in revenue.</p> <p>Many communities experienced significantly increased use of parks during the pandemic that resulted in damage or increased maintenance needs.</p>

	<p>The Interim Final Rule recognizes that “decrease[s to] a state or local government’s ability to effectively administer services” can constitute a negative economic impact of the pandemic.</p>
<p>We already spent some money for safety and health upgrades at the park, etc, can we reimburse ourselves?</p>	<p>Funds are only available for health and safety upgrades completed after March 3, 2021.</p>
<p>Can the ARPA funds be used to promote “tourism”? If they can be used for promoting tourism, can the ARP funds be used to maintain town parks used by tourists and local residents? If we can use the ARPA funds for maintaining town parks, can we purchase a new lawn mower and trailer (to haul to lawn mower to the parks)? Can the purchase of the lawn mower and trailer be made before we receive the ARPA funds, such as a purchase in May of 2021??</p>	<p>Aid dedicated tourism should respond to the negative economic impacts of the pandemic. For example, a recipient may provide aid to support safe reopening of businesses in the tourism industry and to districts that were closed during the COVID-19 public health emergency, as well as aid a planned expansion or upgrade of tourism, travel and hospitality facilities delayed due to the pandemic.</p> <p>See parks answers above.</p> <p>In purchasing equipment, if you had planned to purchase that equipment before the pandemic but did not do so because of the negative economic impact of COVID, then you can use funds to purchase equipment. However, purchase must be made after March 3, 2021. Additionally, this would be an eligible government service to the extent of the community’s loss in revenue.</p>
<p>Could funds be used to maintain a boat landing under tourism?</p>	<p>Under tourism, you would have to show how/why the community was unable to maintain the boat landing as a result of the pandemic and make the clear tie to impact on the tourism industry.</p> <p>This would be an eligible government service to the extent of the community’s loss in revenue.</p>
<p>We have an ATV/UTV with some of the roads coming into our towns designated as parts of the trail. This is a big tourism draw here. Can we use these monies to patch or pave these roads?</p>	<p>Under tourism, you would have to show how/why the community was unable to maintain the roads as a result of the pandemic and make the clear tie to impact on the tourism industry.</p> <p>This would be an eligible government service to the extent of the community’s loss in revenue.</p>

Tourism ONLY if replacing revenue loss, correct?	No, see above.
Elections	
Can we spend this money to update the HVAC system in our current hall and increase the size of our all to allow for social distancing during elections and meetings?	Yes.
My townships leases property to hold all elections and town meetings/business with our local VFW Post. The building was an old school. This building is very much in need of a new ventilation system. Is there any way APRA funding would be eligible for this purpose?	Yes.
Can funds be used to purchase Badger Books for elections? It is more streamlined and can get voters in and out quicker.	<p>This would be an eligible government service to the extent of the community's loss in revenue. There may be an argument that funds are eligible under the Public Health category. The test is:</p> <ul style="list-style-type: none"> 1- Identify a need or negative impact of the COVID-19 public health emergency; and 2- Identify how the expenditure addresses the identified need or negative impact.
Can these funds be used to recoup the cost of installation of an exit sidewalk if we had an entrance and exit for elections and people would not be passing within 6 feet of each other? Extend our parking lot as well had voters parked down the roadside during the election and extra lighting to light the areas? Add a security system to our building with a camera on our Election drop box?	<p>This would be an eligible government service to the extent of the community's loss in revenue.</p> <p>See Public Health test above.</p> <p>Note, additional election specific funding was also made available in previous packages that may be available to you.</p>
Roads	
Are snow plows eligible?	<p>This would be an eligible government service to the extent of the community's loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>

<p>How can the money be used for roads – for example to correct a flooding problem?</p>	<p>This would be an eligible government service to the extent of the community’s loss in revenue.</p> <p>Water (including stormwater) and sewer infrastructure projects are eligible, but it is unclear if related road work is eligible. Need further clarification from Treasury.</p>
<p>Can the money be used to update our town hall parking lot to make it handicapped accessible?</p>	<p>This would be an eligible government service to the extent of the community’s loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>We have mostly gravel roads. We have problems every spring with roads that become almost impassible, even for emergency equipment. We are slowly addressing the issues, but can we use the funds to accelerate the road improvements?</p>	<p>This would be an eligible government service to the extent of the community’s loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>What if you delayed an infrastructure project due to COVID19 (ie concern that workers would’ve contracted COVID)</p>	<p>This would be an eligible government service to the extent of the community’s loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>We delayed seal coating our roads because we were told we may not get state road funding by our state representative. Could we use the funds towards seal coating?</p>	<p>This would be an eligible government service to the extent of the community’s loss in revenue. Outside of revenue lost, this is not likely an eligible use of the funding.</p>
<p>I understand that with ARPA money you are able to use it for infrastructure and safety so would building sidewalks be an option with the money?</p>	<p>Funds can be used more broadly if they assist the hospitality and tourism industries. Are the sidewalks on Main Street helping to get people safely to and/or attract patrons to restaurants or small businesses? That would be an angle to get sidewalks funded.</p> <p>Or, are sidewalks needed in an area that was disproportionately impacted by COVID or in a Qualified Census Tract?</p>
<p>Our town board is considering securing a loan to pave gravel road within the township. If we were to be awarded monies from this program, ARPA, could that funding be used to help pay down the debt of such a loan?</p>	<p>No.</p>

<p>Are there any instances where road projects would fall under approved funding? Would approved projects (addition) to the local community center fall into this funding?</p>	<p>This would be an eligible government service to the extent of the community's loss in revenue.</p>
<p>Town Hall</p>	
<p>Can it be used to upgrade the building air filtration system?</p>	<p>Yes.</p>
<p>Can funds be used to offset the cost of additional cleaning operations, etc prior to voting, town hall meetings, another town hall uses due to the pandemic?</p>	<p>Only costs borne after March 3, 2021.</p>
<p>Would a well at a Town Hall qualify?</p>	<p>This falls under water infrastructure, which is eligible.</p>
<p>What about upgrading virtual meeting capabilities and digital accounting software? This included computers and sound systems.</p>	<p>This could fall under eligible broadband infrastructure.</p>
<p>Can these funds be used to update our town hall furnaces and along with adding better filtration system along with air conditions?</p>	<p>Yes.</p>
<p>Is it possible to utilize some funds for town office modifications? We currently have the treasurer and clerk sharing the same office, and would like to separate offices for possible relief from any form of COVID that may forthcoming?</p>	<p>Yes. Facility modifications are eligible if they are meant to address safe reopening.</p>
<p>Premium Pay</p>	
<p>Can premium pay be advanced to elected officials? Election workers?</p>	<p>Essential workers are those in critical infrastructure sectors who regularly perform in-person work, interact with others at work, or physically handle items handled by others. Communities have the discretion to add additional sectors to this list, so long as the sectors are considered critical to protect the health and well-being of residents.</p> <p>Note- state rules may alter this answer as some states do not allow elected officials to receive premium pay.</p>

<p>What is the start date for retroactive premium pay for essential workers?</p>	<p>January 27, 2020.</p>
<p>Essential workers: how could that work with Townships that have contracts for Fire and Rescue and Police protection?</p>	<p>Any third-party employers of essential workers are eligible. Third-party contractors who employ essential workers in eligible sectors are also eligible for grants to provide premium pay. Selection of third-party employers and contractors who receive grants is at the discretion of recipients. To ensure any grants respond to the needs of essential workers and are made in a fair and transparent manner, the rule imposes some additional reporting requirements for grants to third-party employers, including the public disclosure of grants provided.</p>
<p>U.S. Department of Homeland Security issues guidance on Essential Critical Infrastructure workers during COVID -19 response. Can this be used to define “essential workers” for premium pay use purposes?</p>	<p>Communities have the discretion to add additional sectors to the list of critical infrastructure sectors, so long as the sectors are considered critical to protect the health and well-being of residents. The employees must have performed work in-person work, interacted with others at work, or physically handled items handled by others.</p>
<p>With the 150% cap, that means for every \$100, the person can get an additional \$15 or is it only an additional \$50?</p>	<p>Premium pay is defined as an amount up to \$13 per hour in addition to wages or remuneration the worker otherwise receives and in an aggregate amount not to exceed \$25,000 per eligible worker.</p> <p>Premium pay that would increase a worker’s total pay above 150% of the greater of the state or county average annual wage requires specific justification for how it responds to the needs of these workers.</p>
<p>Could that also extend to the town treasurer because they had to be in the office to help anyone that needed assistance with their payments?</p>	<p>Communities have the discretion to add additional sectors to the list of critical infrastructure sectors, so long as the sectors are considered critical to protect the health and well-being of residents. The employees must have performed work in-person work, interacted with others at work, or physically handled items handled by others.</p>
<p>In terms of premium pay for workers, is there a timeline or a window of time in which the work should have been done? For example, March 17, 2020 or April 6, 2021?</p>	<p>January 27, 2020 – December 31, 2024.</p>

<p>If we apply some of this as premium pay for our own employees, how would this affect our payroll and also will this mean we must also find underpaid frontline workers in our township that deserve and should be issued premium pay? Do we have to do both?</p>	<p>This is a one-time pay increase for a specific time period. Just because you provide premium pay to township employees, you do not have to provide premium pay to others outside of township government.</p>
<p>Can premium pay be paid retroactively to essential employees (sewer department) that worked throughout the pandemic?</p>	<p>Yes.</p>
<p>Water, Sewer, Broadband Infrastructure</p> <p>All projects that are eligible under the EPA’s Clean Water State Revolving Fund and Drinking Water State Revolving Fund are eligible uses of CSLFRF. Note, each state may have its own statutes, rules, and regulations that guide project eligibility.</p>	
<p>Does a storm sewer count as an eligible use?</p>	<p>Yes.</p>
<p>Can funds be utilized for surface water protection and environmental remediation?</p>	<p>Need more specifics to answer. If the project is water quality of surface waters, then yes, CWSRF can be used to address point source and non-point source water quality concerns. If the project is environmental restoration or ecosystem restoration, it also can be funded as part of a non-point source pollution control program under the CWSRF.</p>
<p>Can the water and sewer infrastructure money include cameras and physical security as well as cybersecurity?</p>	<p>Yes.</p>
<p>We have a Sanitary District which covers water and sewer. The district is not eligible for funds. Could we give them money for a lift station?</p>	<p>Yes.</p>
<p>We have a non-potable well at the town hall. Would we be able to use the funds for a new well?</p>	<p>Yes.</p>
<p>We have a public sewer system that services two local lakes. Can we do improvements to that system?</p>	<p>Yes.</p>
<p>Can the money be used for putting up more broadband towers?</p>	<p>Yes.</p>

<p>We have the only public beach on Lake Wissota a manmade lake near Chippewa Falls Wisconsin and this last year along with so for this year has had extremely heavy use. We currently have a pit toilet system and would like to update the facilities to flush toilets along with running water for better sanitation. Can these funds be used for this purpose?</p>	<p>Yes.</p>
<p>We have an important watershed area in our town and we provide yearly support for a non-profit that helps farmers and citizens protect the watershed. Would more funding for this organization due to loss of income and importance of this environmental feature be allowed with some of our ARPA funds?</p>	<p>Yes.</p>
<p>Can the money be used for putting up more broadband towers?</p>	<p>Yes.</p>