What Every Georgia City Needs to Know About ARPA This Fall



Fall 2024

Disclaimer: This document contains information about federal ARPA funds that cities received as a pass-through from the Georgia Governor's Office of Planning and Budget – not the competitive ARPA grants awarded by the State of Georgia. Be sure to reference US Treasury guidance (Recipient Compliance and Reporting Responsibilities), and consult your city attorney on matters specific to your city's ARPA investments.

Before proceeding: Know these two acronyms: ARPA and SLFRF. ARPA stands for American Rescue Plan Act, federal legislation signed into law March 2021 that provided nearly every city in Georgia (among other governmental and non-governmental entities) funding to respond to the public health and negative economic impacts of COVID-19. SLFRF stands for State and Local Fiscal Recovery Funds, the bucket of funding that went to states and local governments.

As we approach the December 31, 2024 obligation deadline, are you *ARPA*?

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ALLOCATING your funds to specific projects?	To simplify the use and reporting of ARPA funds, cities can elect a Standard Allowance of up to \$10 million, not exceeding your total
	award. This amount can be designated as revenue replacement and
	used for virtually any government service, with a few exceptions.
	However, make sure those funds are obligated and
	allocated to specific projects. In other words, you may
	not simply put them in your general fund and count that
	as an obligation.
R	Most cities are Non-Entitlement Units and required to report to
	Treasury annually by April 30 through 2027 . Your next report will be
	due April 30, 2025 and should cover:
REPORTING on time	Obligations between Apr 1, 2024 – Dec 31, 2024
and adequately?	Expenditures between Apr 1, 2024 – Mar 31, 2025
	Metro Cities and NEUs receiving over \$10 million report quarterly.
Р	Cities must obligate their ARPA funds by December 31, 2024 . Cities
	have until the end of 2026 to fully spend it. What does that mean?
PREPARED for the year-end deadline?	Treasury defines obligation as an order placed for property and
	services and entering into contracts, subawards, and similar
	transactions that require payment. See back side for more.
ALWAYS tracking and documenting your spending?	The best way to ensure you stay on top of ARPA compliance and
	reporting requirements and avoid losing unspent funds is good
	organization and documentation.
	✓ Track expenses in a spreadsheet
	✓ Keep a physical and digital record of ARPA
	everything, and store all documents in an
	easily accessible "ARPA folder"
	✓ Know your Login.gov username and password to avoid delays
	with reporting

In an August 14 NLC webinar, Treasury staff discussed what ARPA recipients need to know for the upcoming 12/31/24 deadline. GMA has extracted these screenshots from the presentation:

An obligation is NOT:

- An adopted budget or budget amendment
- An appropriation of SLFRF funds
- An executive order
- A resolution
- A written or oral intention to enter into a contract
- A grant of legal authority to enter into a contract
- Claiming funds under the revenue loss category
- Moving SLFRF funds to a general fund as revenue loss but not further establishing an obligation with those funds by 12/31/24

Aren't revenue loss funds automatically obligated?

NO. See FAQ 17.15.

- All SLFRF funds under any eligible use category are subject to the obligation requirements – including funds used under the revenue loss category.
- This means that, when a recipient uses funds to provide government services, those funds must be obligated via one of the pathways discussed on slide 7.
- If a recipient is utilizing revenue loss to pay for government services, the recipient must report the use as project(s) under expenditure category 6.1.
- Recipients must enter a project description for any project entered under 6.1. Revenue loss project descriptions must summarize the project in sufficient detail to provide an understanding of the major activities that will occur. Descriptions should establish what the project seeks to accomplish and should include enough information to make clear how the recipient determined the project's eligibility.