



8. Payroll for Public Health and Safety Employees (EC 3.1) – *Collection began in January 2022:*
 - Number of government FTEs responding to COVID-19 supported under this authority

9. Rehiring Public Sector Staff (EC 3.2) – *Collection began in January 2022:*
 - Number of FTEs rehired by governments under this authority

10. Premium Pay (both Public Sector EC 4.1 and Private Sector EC 4.2) – *Collection began in January 2022; additional field began in April 2022*
 - List of sectors designated as critical to protecting the health and well-being of residents by the chief executive of the jurisdiction, if beyond those included in the 2022 final rule (*Collection began January 2022*)
 - Number of workers to be served (*Collection began January 2022*)
 - Employer sector for all subawards to third-party employers (i.e., employers other than the State, local, or Tribal government) (*Collection began January 2022*)
 - For groups of workers (e.g., an operating unit, a classification of worker, etc.) or, to the extent applicable, individual workers, other than those where the eligible worker receiving premium pay is earning (with the premium pay included) below 150 percent of their residing state or county's average annual wage for all occupations, as defined by the Bureau of Labor Statistics Occupational Employment and Wage Statistics, whichever is higher, on an annual basis; OR the eligible worker receiving premium pay is not exempt from the Fair Labor Standards Act overtime provisions:
 - A brief written narrative justification of how the premium pay or grant is responsive to workers performing essential work during the public health emergency. This could include a description of the essential workers' duties, health or financial risks faced due to COVID-19, and why the recipient government determined that the premium pay was responsive to workers performing essential work during the pandemic. This description should not include personally identifiable information; when addressing individual workers, recipients should be careful not to include this information. Recipients may consider describing the workers' occupations and duties in a general manner as necessary to protect privacy (*Collection began January 2022*)
 - Number of workers to be served with premium pay in K-12 schools (*Collection began April 2022*)

11. Revenue replacement (EC 6.1) – *Collection began in August 2021:*

As outlined in the 2022 final rule, recipients have the option to make a one-time decision to calculate revenue loss according to the formula outlined in the 2022 final rule or elect a "Standard Allowance" of up to \$10 million, not to exceed the award allocation, to spend on government services throughout the period of performance. The option to make this one-time decision was provided during the April 30, 2022 reporting deadline. Recipients may update their revenue loss determination, as appropriate, through the April 2025 reporting period. Upon update, any prior revenue loss election will be superseded. Recipients must use a consistent methodology across the period of performance (i.e., choose either the standard allowance or the full formula) and may not elect one approach for certain reporting years and the other approach for different reporting years.

For recipients electing the "Standard Allowance," Treasury will presume that up to \$10 million, not to exceed the award allocation, in revenue has been lost due to the public health emergency. Recipients are permitted to use that amount to fund "government services." Please note that electing the standard allowance does not change a recipient's total allocation. Recipients that elect to use this standard allowance will make this election instead of calculating lost revenue using the formula.



Revenue Replacement



ARP ALLOWABLE USES



UNIFORM GUIDANCE



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TRAINING & OFFICE HOURS

FAQ



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Revenue Replacement

A local government may expend Coronavirus State and Local Fiscal Recovery Funds (CSLFRF) on a broad range of general government services under the Revenue Replacement allowable use category. There are two ways to proceed under this category: a unit may either elect to take

the \$10 million Standard Allowance or it may calculate actual revenue loss according to U.S. Treasury's formula outlined in the Final Rule.

The Standard Allowance allows a local government to expend up to \$10 million of its CSLFRF funds in the Revenue Replacement category without having to demonstrate any actual lost revenue. US Treasury has stated that a local government must elect either the Standard Allowance or the Formula Approach for Revenue Replacement in the April 30, 2022 Project and Expenditure Report. This is a one-time election that cannot be changed.

Importantly, by electing the standard allowance and spending CSLFRF funds as revenue replacement does not convert CSLFRF funds into general revenue funds. The CSLFRF funds remain grant funds and must be expended in compliance with the the grant award terms and conditions.

- **May a local government elect the Standard Allowance if it did not experience any revenue loss?** Yes; there is no requirement to prove a loss in revenue. Treasury will presume that each jurisdiction experienced up to \$10 million in lost revenue. If a local government received less than \$10 million in CSLFRF funds, it may take the Standard Allowance for the full amount it received. For example, if a local government received \$1.2 million, it may expend up to \$1.2 million as revenue replacement.
- **If a local government elects the Standard Allowance does it have to spend all of its CSLFRF funds in the Revenue Replacement category?** No. Electing the Standard Allowance just indicates the maximum amount a local government may spend in the Revenue Replacement category, but it does not require a local government to spend all, or even any, of its CSLFRF funds in the Revenue Replacement category.
- **Are CSLFRF funds expended under the Revenue Replacement category subject to the Uniform Guidance?** Likely, yes. As of 4/5/2022, Treasury has not exempted funds expended for general government services under the Revenue Replacement category from the Uniform Guidance. The safest bet is to assume the Uniform Guidance applies until Treasury says otherwise.
- **What are the benefits of expending CSLFRF on general government services in the Revenue Replacement category?** A general government service includes any service traditionally provided by government that a local government has state law authority to engage in, including public enterprise activities. Spending funds in the Revenue Replacement category allows a local government to undertake a wide array of potential expenditures, including within this covering the salaries and fringe benefits of local government employees; park

improvement projects; purchasing equipment and supplies for local government operations; renovating public buildings and facilities; and many more. U.S. Treasury has also provided a list of general government services that a local government may presume are eligible uses of CSLFRF funds, including:

- maintenance or pay-go funding building of infrastructure, including roads;
 - modernization of cybersecurity, including hardware, software, and protection of critical infrastructure;
 - health services; environmental remediation; school or educational services; and
 - the provision of police, fire, and other public safety services (e.g., purchasing a fire truck or police vehicles, purchasing other equipment, covering salaries of public safety personnel).
- **Is there a strategic way to expend CSLFRF funds (i.e., how do we make the best use of funds and trigger the fewest compliance requirements)?** A local government may choose to allocate CSLFRF funds to those projects and expenditures that will trigger the fewest Uniform Guidance compliance requirements, thereby limiting the administrative burden. For example, instead of purchasing new police vehicles, which would trigger UG procurement and property management standards, a local government may opt to fund personnel salaries. In doing so, the unit will have freed up general fund revenue that would have otherwise been used to pay for salaries. This additional general fund revenue could then be expended on the purchase new police vehicles, which would only trigger state law procurement and property disposal requirements.
 - **May CSLFRF funds be spent to cover employee salaries and fringe benefits?** 2 C.F.R. 200.430 & .431 authorize a local government to spend Federal grant funds to cover employee salaries and fringe benefits when certain conditions are met. Specifically, salary expenditures must be reasonable and fringe benefits are allowable only if a specific covered benefit is required by law or provided as part of an established policy. Allowable fringe benefits may include: covering leave during authorized absences (annual leave, family-related leave, sick leave, holidays, court leave, military leave, administrative leave); employer contributions or expenses for social security; employee life, health, unemployment, and worker's compensation insurance; individual retirement account contributions, and similar benefits. Although the Uniform Guidance allows pension plan contributions, the terms and conditions of the [*ARP award expressly prohibit lump sum deposits into pension funds*](#). Contributions to individual employee retirement accounts are allowable.

- **May Revenue Replacement CSLFRF funds be expended on capital improvement projects?** Yes, CSLFRF may be spent on capital improvement projects under the Revenue Replacement category, and no preapproval from Treasury is necessary to engage in a capital improvement project. Additionally, unlike capital expenditures within the [Address COVID Public Health & Negative Economic Impact category](#), there is no requirement to provide written justification for capital improvement projects costing more than \$1 million.
- **May a unit combine CSLFRF with other revenue sources to fund a project?** Yes. Treasury allows the “blending and braiding” of funds to complete eligible projects. Recipients may undertake projects on their own using various revenue sources, pool funds with other recipients, or contract with a subrecipient to complete eligible projects. Importantly, CLFRF may not be used to fund debt services or cover borrowing costs. When completing a capital project, CLFRF can fund the cash portion of the project (the “pay-go” portion), but other revenue sources must fund any debt or borrowing costs.
- **May CSLFRF funds available under the Revenue Loss category be used to meet the non-federal match or cost-share required of other federal programs?** Yes, funds under the Revenue Loss category generally may be used to meet the non-federal cost-share or matching requirements of other federal programs. CSLFRF funds may not be used as the nonfederal share for purposes of a state’s Medicaid and CHIP programs. CSLFRF funds in the other eligible use categories may not be used to meet the non-federal match or cost-share requirements of other federal programs, [unless specifically provided for by statute](#).

[American Rescue Plan Act of 2021: Coronavirus State & Local Fiscal Recovery Funds Final Rule — Spending Funds for General Government Purposes](#)

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Section II. Reporting Requirements

a) Reporting Requirements by Recipient

For the SLFRF program, reporting requirements vary by recipient type, as shown in the table below. Detailed instructions for completion and submission of each report are covered in Part 2 of the [Reporting Guidance](#).

Tier	Recipient	Interim Report	Project and Expenditure Report	Recovery Plan Performance Report
1	States, U.S. territories, and metropolitan cities and counties with a population that exceeds 250,000 residents	By August 31, 2021, or 60 days after receiving funding if funding was received by October 15, with expenditures by category.	By January 31, 2022, and then the last day of the month after the end of each quarter thereafter	By August 31, 2021, or 60 days after receiving funding, and annually thereafter by July 31
2	Metropolitan cities and counties with a population below 250,000 residents that are allocated more than \$10 million in SLFRF funding, and NEUs that are allocated more than \$10 million in SLFRF funding	<i>Note: NEUs were not required to submit an Interim Report</i>	<i>Note: NEUs were not required to submit a Project and Expenditure Report on January 31, 2022. The first reporting date for NEUs was April 30, 2022.</i>	
3	Tribal Governments that are allocated more than \$30 million in SLFRF funding			
4	Tribal Governments that are allocated less than \$30 million in SLFRF funding		By April 30, 2022, and then annually thereafter	
5	Metropolitan cities and counties with a population below 250,000 residents that are allocated less than \$10 million in SLFRF funding, and NEUs that are allocated less than \$10 million in SLFRF funding			

Note: Based on the period of performance, reports will be collected through April 30, 2027.

The total SLFRF allocations across all sources for a given jurisdiction are used to identify that jurisdiction's Reporting Tier, beginning in April 2022. Treasury may reach out to jurisdictions to update Reporting Tiers.

ARPA CURRENT TIMELINE



Final Rule went into effect

April 1, 2022

January 31, 2023

Quarterly Report Deadline

Counties with a population of 250,000 residents and counties below that pop. threshold that are allocated more than \$10 million in SLFRF funding submitted an initial Project and Expenditure report to U.S. Treasury. These counties will submit Project and Expenditure Reports on a quarterly basis.

Annual Report Deadline

April 30, 2023

Counties with a population below 250,000 residents that are allocated less than \$10 million in SLFRF funding will submit their initial Project and Expenditure Report to Treasury. These counties will submit subsequent Project and Expenditure Reports on an annual basis.

July 31, 2023

Quarterly Reporting Deadline

October 31, 2023

Quarterly Reporting Deadline

January 31, 2024

Quarterly Reporting Deadline

April 30, 2024

Annual Report Deadline

July 31, 2024

Quarterly Reporting Deadline

October 31, 2024

Quarterly Reporting Deadline

Obligation Deadline

December 31, 2024

January 31, 2025

Quarterly Reporting Deadline

April 30, 2025

Annual Report Deadline

July 31, 2025

Quarterly Reporting Deadline

October 31, 2025

Quarterly Reporting Deadline

Quarterly Reporting Deadline

January 31, 2026

Annual Report Deadline

April 30, 2026

Quarterly Reporting Deadline

July 31, 2023

Quarterly Reporting Deadline

October 31, 2023

December 31, 2026

Expenditure
Deadline