

Capacity Building ARPA Funds- FAQs

What is a Subrecipient of SLFRF/ARPA funds?

A non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program.

****In simpler terms, it's an entity that carries out the program for the entity that received the award dollars.*

Who is a Beneficiary of ARPA funds?

For this award it is strictly for Non-Profits/CBOs in any sector that have faced or are facing negative economic impacts of the COVID-19 pandemic.

What is the Final Rule?

The Final Rule was released on January 6, 2022 and took effect on April 1, 2022. State and local funding allocated in the American Rescue Plan is subject to the specifications outlined in the Final Rule. The Final Rule provides a comprehensive list of eligible expenditures, encouraged expenditures, and prohibited expenditures. The Final Rule Overview provides a non-exhaustive list of provisions in the Final Rule and serves as a guide for some of the actions municipalities may take in utilizing their recovery funds.

What are SLFRF Subrecipient requirements?

- *Subrecipient must have a Unique Entity Identifier (UEI) number*
- *Subrecipient must have an active SAM registration, which must also be renewed annually*
- *Subrecipient must only spend funds for eligible uses, including selection of beneficiaries*
- *Subrecipient must submit on time their Quarterly financial and programmatic reporting*
- *Subrecipient will be responsible for knowing and understanding the SLFRF Treasury Final Rule as applicable to this program*
- *Subrecipient must also be familiar with 2 CFR 200 (the Uniform Guidance)*
- *Subrecipient must follow and understand any other U.S. Treasury pass-through requirements*

The County is required to perform a risk assessment for all Federal Subrecipients. Elements of that risk assessment will include:

Pass through entities are required by 200 C.F.R. § 200.332(b) to:

“Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in paragraphs (d) and (e) of this section, which may include consideration of such factors as:

1) The subrecipient's prior experience with the same or similar subawards;

2) *The results of previous audits including whether the subrecipient receives a Single Audit in accordance with Subpart F of this part, and the extent to which the same or similar subaward has been audited as a major program;*

3) *Whether the subrecipient has new personnel or new or substantially changed systems; and*

4) *The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency)."*

Can a Subrecipient use the recovery dollars for their own capacity building?

No. The dollars in the budget should be separated for costs that the Subrecipient would incur to deliver the recovery and technical/capacity building assistance.

Which Non-Profits will be eligible to be beneficiaries?

The dollars should be available for all 501(c)(3)s that face or have faced negative economic impacts of the COVID-19 pandemic.

Why can't the county just give funds directly to beneficiaries?

The county wants to ensure a consistent and stable process for providing the dollars to the high volume of approved beneficiaries.

Can Subrecipients use ARPA funds for their own capacity building needs?

No. The Subrecipient must have the capacity to deliver their proposed program.

How will beneficiaries get connected to Subrecipients?

The Subrecipient will be required to run an outreach program and execute a selection process for beneficiaries. Also, the Subrecipient will be supported by receiving a list of Clackamas County CBO contacts who have indicated a need for relief under this program.

What if a beneficiary does not have a 501(c)(3) determination yet from the Internal Revenue Service?

Beneficiaries must have been established prior to January 1, 2022 (IRS letters must have been received prior to this time for new nonprofits). There must be proof that the public benefit corporation has been negatively impacted by the COVID19 pandemic.

Do subrecipients have to be located in Clackamas County?

No, Subrecipients can be located anywhere but must be familiar with the nonprofit community in Clackamas County.

Do Nonprofit/CBO beneficiaries have to be located in Clackamas County?

The beneficiaries must operate within or have a location within Clackamas County.

How will Clackamas County ensure ARPA dollars are going to Nonprofits/CBOs that operate within Clackamas County?

Subrecipients will be required to verify the operations location of all nonprofit beneficiaries. Any determination by the County that the subrecipient has made a beneficiary payment to a non-eligible nonprofit will result in a disallowed cost. Nonprofits/CBOs must be named for the reporting metrics of ARPA. It will be the responsibility of the Subrecipients to track their beneficiary awards.