

The American Rescue Plan Act of 2021 (ARP) will provide more than US\$130 billion to local governments to support the public health response to the COVID-19 pandemic through the Coronavirus State and Local Fiscal Recovery Funds Program.

US Treasury guidance issued on April 15 outlines pre-award requirements for certain local governmental entities to receive payments under the program. Under this recent [Treasury guidance](#), governmental entities that are eligible to receive direct payment from the federal government, including states, counties and metropolitan cities with populations over 50,000, must:

- (1) Have a Data Universal Numbering System (DUNS) number** – DUNS numbers, which are utilized by the federal government to track how funding is allocated, can be obtained at <https://fedgov.dnb.com/webform/> or by calling +1 866 705 5711; and
- (2) Be registered in the System for Award Management (SAM) database** – All federal assistance recipients must be actively registered on <https://SAM.gov> (note: annual renewal of SAM registration is required to remain active). While obtaining a DUNS number is generally an expedient process, SAM registration may take several weeks. Thus, a delay in registering could affect timely receipt of ARP funds.
- (3) Collect the necessary payment information** – This includes EIN, name and title of an authorized representative of the governmental entity and financial institution information (including routing and account number, financial institution name and contact information).

“Non-entitlement units of local government,” meaning other cities and local government units that are not metropolitan cities, will not be eligible to receive APR funds directly from the federal government, but will receive their allocated portion of APR funds from their respective states in proportion to their population. Non-entitlement units will also need to have a DUNS number to meet reporting requirements under the program.

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APR funds may be used by local governments to:

- (1) Respond to the COVID-19 pandemic or its negative economic impacts, including assistance to households, small businesses and nonprofits, or aid to impacted industries, such as tourism, travel and hospitality;
- (2) Provide premium pay to eligible workers performing essential work (as determined by each recipient government) during the pandemic, providing up to US\$13 per hour above regular wages (with a maximum benefit of US\$25,000 per eligible worker);
- (3) Provide government services to the extent of the reduction in revenue due to the pandemic (relative to revenues collected in the most recent full fiscal year prior to the emergency); and
- (4) Make necessary investments in water, sewer or broadband infrastructure.

Additional guidance from the Treasury regarding the Coronavirus State and Local Fiscal Recovery Funds Program and use of APR funds will be forthcoming.

Stay Tuned!

Squire Public Finance will make available any helpful information as soon as we receive it. In the meantime, please feel free to reach out to your Squire Public Finance contact or any of the contacts listed.