

Treasury Releases Pre-Award Requirements for State/Local Aid; Recommended Action for Districts

The U.S. Department of the Treasury released on April 15 preliminary requirements for governments seeking the American Rescue Plan (ARP) Act's Coronavirus State and Local Fiscal Recovery Funds.

According to the [Treasury update](#), all state and local governments as outlined in ARP must register with the System for Awards Management (SAM) and acquire a Data Universal Numbering System (DUNS) number, which is used to track federal financial assistance. Although the guidance more specifically outlines this requirement for governments receiving direct payments from the Coronavirus State and Local Recovery Funds, those receiving pass through monies, such as non-entitlement units of local government, must also register for DUNS and SAM. As states, counties and cities have authority within ARP to transfer these funds to special districts, thus providing pass-through dollars, districts are strongly recommended to complete these processes for ARP relief monies. Secondly, registering for SAM and DUNS now may be beneficial for future federal programs.

DUNS processing may take several business days and SAM processing could take as long as three weeks. Both programs are free of charge.

[Click here](#) to register for a DUNS number or check whether a district's DUNS number is valid. Districts may also call (866) 705-5711 to get started.

[Click here](#) to register for SAM. All entities receiving federal financial assistance must maintain an active SAM registration. Renewal is required on an annual basis. The U.S. Government Services Administration (GSA) has an overview of the SAM program [at this link](#).

Districts anticipating relief payments should gather payment information to file as well, including:

- Federal Entity Identification Number (EIN), name, and contact information
- Name and title of an authorized representative of the entity
- Financial institution information such as routing and account number, financial institution name and, and contact information.

While preparing for the potential access to funds, districts should also be preparing to demonstrate need for ARP state/local relief. ARP outlines the following use of funds as eligible:

- Emergency funding to respond to the COVID-19 public health emergency
- Programs responding to the negative economic impacts of the pandemic including assistance to households, small businesses, and nonprofits, or aid to impacted industries, such as tourism, travel, and hospitality.
- Revenue loss for the most recent completed fiscal year.
- Providing premium pay for government workers providing "essential work."
- "Necessary investments" in water, sewer, and broadband infrastructure.

Guidance on the use of ARP fiscal recovery funds is still pending and is expected to be released in the coming weeks, which will specify what "essential work" and "necessary investments" means in eligible use of funds.

Contact **X**, for additional information or questions.