

Manuel Abarca IV

From: SLFRF@treasury.gov
Sent: Thursday, August 1, 2024 3:01 PM
To: Manuel Abarca IV; ssmith@jacksongov.org; Venessa Huskey; Donna Peyton; DaRon McGee; Jalen Anderson
Subject: EXTERNAL RE: Jackson Co, MO ARPA Dollars
Attachments: United States Treasury Department Letter.pdf

WARNING: This email originated outside of Jackson County.
DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Thank you for your email and recent related letter, attached. Please see responses to your questions, below.

Please confirm what could/would happen and the timelines for which funds would be impacted if we don't appropriate them timely?

Section 17 of the State and Local Fiscal Recovery Funds (SLFRF) FAQs provides guidance about recipients' responsibility to obligate SLFRF funds by December 31, 2024. As SLFRF FAQ 17.1 explains:
The [SLFRF authorizing] statute requires that SLFRF funds may only be used to cover costs incurred by December 31, 2024. Treasury implemented this requirement by providing that a cost is considered incurred by December 31, 2024, if a recipient has incurred an obligation with respect to the cost by December 31, 2024. Under the rule adopted in 2021, an "obligation" means an order placed for property and services and entering into contracts, subawards, and similar transactions that require payment. Under the amendment to the rule adopted in 2023, an obligation also includes a requirement under federal law or regulation or provision of the SLFRF award terms and conditions to which a recipient becomes subject as a result of receiving or expending SLFRF funds.

As explained in SLFRF FAQ 17.2, recipients are required to return to Treasury any SLFRF funds that have not been obligated by the obligation deadline of December 31, 2024. Treasury will provide a deadline by which recipients must return funds not obligated by December 31, 2024.

The SLFRF FAQs discuss different ways that recipients may satisfy the obligation deadline. Treasury also has provided a number of resources to help recipients understand how to meet the obligation deadline in addition to section 17 of the [SLFRF FAQs](#). This includes holding [webinars](#) in May 2024 walking through the new obligation FAQs. This [webinar](#) was recorded and is available on [SLFRF's website](#), along with the [slide deck](#) that was presented in the webinar.

Please provide information to help us understand any compliance requirements or deadlines for our County to the Treasury?

Under the SLFRF program, states, territories, and metropolitan cities and counties with a population that exceeds 250,000 residents—which Jackson County, Missouri, is—must submit quarterly Project and Expenditure reports to Treasury. In addition, the County must publish and submit to Treasury a Recovery Plan performance report on an annual basis. This was due to Treasury on July 31, 2024, along with the Project and Expenditure report with data through June 30, 2024.

More information about Jackson County's compliance requirements and deadlines can be found on the [SLFRF Reporting and Compliance website](#), where you can find the [Compliance and Reporting Guidance](#), the [July 2024 P&E Reporting Guidance](#), and other resources.

Furthermore, could you please share with us any amount of previous funding returned to the Treasury Department from the two rounds of CARES Act funding from Jackson County, MO?

Jackson County, Missouri, returned \$502,856.25 in Coronavirus Relief Funds.

Finally, for previously expensed (CARES or ARPA) funds, used for the purchase of a building, that unfortunately now may be sold to not expend further dollars, what is to be done with the proceeds of such a sale?

For questions regarding the use of payments from the Coronavirus Relief Fund (CRF), please see the program's [guidance](#). CRF FAQ B.5. explains that, if an asset purchased with CRF funds was disposed of prior to December 31, 2021, the proceeds were subject to restrictions on the eligible use of payments from the CRF provided by section 601(d) of the Social Security Act. For dispositions that occur after that date, the CRF program does not impose any restrictions.



COUNTY LEGISLATURE
JACKSON COUNTY, MISSOURI

MANUEL ABARCA IV
LEGISLATOR, 1ST DISTRICT

JACKSON COUNTY COURTHOUSE
415 E. 12th, 2nd Floor
Kansas City, Missouri 64106

July 22, 2024

United States Department of Treasury
1500 Pennsylvania Ave. NW
Washington, D.C. 20220

To Whom it May Concern,

We are sending this letter out of great concern. Jackson County Missouri is the gracious recipient of dollars through the American Rescue Plan Act (ARPA).

Having received such funding, we realize we have specific obligations. These obligations include, but are not limited to, how the ARPA funds are allocated and the deadline for distributing these funds. We also are concerned about required reporting updates and adherence to all guidelines

Ultimately our goal is to best serve the people of Jackson County. Therefore, it is important we do our due diligence to avoid any mishaps on our county's part. We of course do not want to risk not handling ARPA funds in the best interest of pandemic recovery plans for our county.

- Please confirm what could/would happen and the timelines for which funds would be impacted if we don't appropriate them timely?
- Please you provide information to help us understand any compliance requirements or deadlines for our County to the Treasury?
- Furthermore, could you please share with us any amount of previous funding returned to the Treasury Department from the two rounds of CARES Act funding from Jackson County, MO?
- Finally, for previously expensed (CARES or ARPA) funds, used for the purchase of a building, that unfortunately now may be sold to not expend further dollars, what is to be done with the proceeds of such a sale?

We appreciate this opportunity to seek your advice and clarification. You will certainly help us better understand any challenges we could face as we attempt to get these dollars distributed into our community.

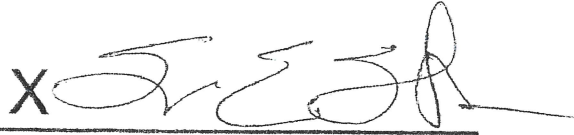
Thank you for your help and support and we look forward to your response.

Sincerely,

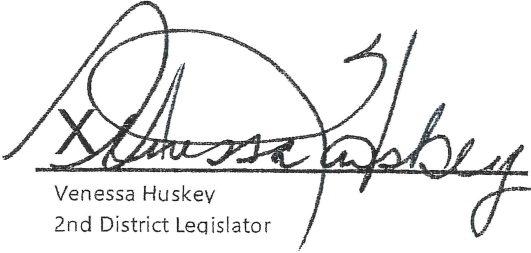
(the undersigned)

X 

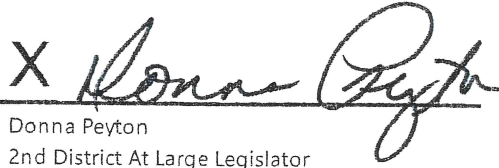
Manuel R. Abarca IV
1st District Legislator

X 

Sean Smith
6th District Legislator

X 

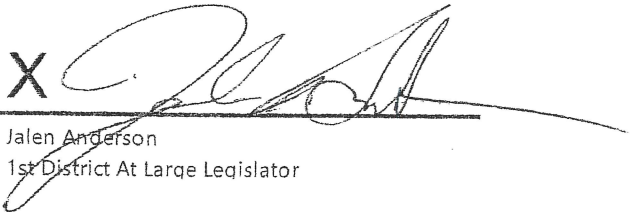
Venessa Huskey
2nd District Legislator

X 

Donna Peyton
2nd District At Large Legislator

X 

DaRon McGee
4th District Legislator

X 

Jalen Anderson
1st District At Large Legislator

Cc/Mary Jo Spino, Jackson County Clerk; Frank White, County Executive