

CUMBERLAND COUNTY BOARD OF COMMISSIONERS  
AMERICAN RESCUE PLAN COMMITTEE  
COURTHOUSE, 117 DICK STREET, 5TH FLOOR, ROOM 564  
OCTOBER 13, 2022 – 11:00 AM  
SPECIAL MEETING MINUTES

PRESENT: Commissioner Jimmy Keefe, ARP Committee Chairman  
Commissioner Glenn Adams  
Commissioner Toni Stewart  
Amy Cannon, County Manager  
Tracy Jackson, Assistant County Manager  
Sally Shutt, Assistant County Manager  
Brian Haney, Assistant County Manager  
Heather Skeens, Assistant County Manager  
Rick Moorefield, County Attorney  
Vicki Evans, Finance Director  
Ivonne Mendez, Deputy Finance Director  
Tye Vaught, Chief of Staff  
Kevin McGuckin, Assistant County Attorney  
Candice H. White, Clerk to the Board  
Press

1. CALL TO ORDER

Commissioner Keefe called the special meeting to order.

2. APPROVAL OF AGENDA

MOTION: Commissioner Stewart moved to approve the agenda.

SECOND: Commissioner Adams

VOTE: PASSED (2-1) (Commissioners Stewart and Adams voted in favor; Commissioner Keefe voted in opposition)

3. ITEMS OF BUSINESS

A. Request for ARP Funding to Continue Emergency Rental and Utility Assistance

BACKGROUND

In January 2021, Cumberland County entered into an agreement with NCPRO to receive funding to administer a program to assist Cumberland County residents with rent and utility assistance for those who experienced hardships due to the Covid-19 pandemic. During that time, the County contracted with organization, Innovative Emergency Management (IEM), to operate this program.

In May 2022, Cumberland County DSS (CCDSS) became the administrator of the County's Emergency Rental and Utility Assistance Program (ERAP). CCDSS received around 6,000

applications from IEM to process. CCDSS also received approximately \$4.3 million in State ERA-1 to process the backlogged applications.

The use of this funding expired on September 30, 2022. The agency has approximately 645 applications that are currently pending. Approved applications as of October 1, 2022 will not be eligible to pay under State ERA-1 due to expiry of the funding.

We are anticipating our allocation of State ERA-2 funding from NCPRO within a few weeks and have requested reallocation of Treasury ERA-2 (ERA-2) monies. ERA-2 funds will be used to address new rent and utility applications when the application portal is opened on November 1st. We are requesting to access ARP funding set aside for rental assistance to use as bridge funding to continue processing backlogged applications until a new agreement is executed and new funding is received from NCPRO for the ERA-2 allocation.

Thank you for consideration of this matter that will provide vital rental and utility assistance to residents of Cumberland County.

#### RECOMMENDATION / PROPOSED ACTION

Staff requests the ARP Committee's approval to use ARPA funding allocated for Household Assistance: Rental Assistance in the amount of \$1.5 million to fund pending applications unfunded after the September 30, 2022, ERA-1 expiration date.

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Heather Skeens, Assistant County Manager, presented the background information recorded above. Ms. Skeens stated the county received around 6,000 applications from IEM to process and has approximately 645 applications that are currently pending. Ms. Skeens explained the county inherited the situation, did not have the software programming available to process applicants rapidly and so the county's ITS developed a program because purchasing the program was not affordable. Ms. Cannon also explained some of the challenges and delays the county encountered when the county became the administrator of the Emergency Rental and Utility Assistance Program (ERAP).

Commissioner Keefe expressed concern that the county left 75% or \$12M of the State ERA-1 funds on the table because it did not process and spend the funds by the September 30, 2022 expiration date. Commissioner Keefe also stated he could only support the request for \$1.5 million if it was a loan and if it was the actual amount needed for the 645 applicants. Commissioner Adams stated the ARP Committee allocated \$1.5M for rental assistance and it can be allocated now or later. Commissioner Adams stated the applicants need the money now to pay for rent and utilities and he does not believe it is right to say the county has the money but is not going to give it to the applicants. Discussion followed. Ms. Skeens stated she would have to ask NCPRO whether the money could be considered a loan and paid out prior to the county's ERA-2 allocation. Commissioner Keefe stated he did not want to give up \$1.5M if it could be supplemented by another revenue source. Commissioner Stewart stated the ARP Committee allocated \$1.5M and she does not think it matters when the county uses it so why not use it when the 645 applicants need it now. Questions followed about ERAP and ARAP timelines and guidelines/rules.

MOTION: Commissioner Adams moved to use up to \$1.5M to fund the pending applications that were not funded after the September 30, 2022 ERA-1 expiration date.

SECOND: Commissioner Stewart

DISCUSSION: Commissioner Keefe stated he hoped to get more data on whether the \$1.5M would be a bridge loan and whether the \$1.5M would take care of the 645 pending applications, particularly when each of the 645 applications should have a dollar amount attached to them. Commissioner Adams stated the data can still be provided because the item will be forwarded to the full board for action.

VOTE: PASSED (2-1) (Commissioners Stewart and Adams voted in favor; Commissioner Keefe voted in opposition)

#### 4. UPDATES

##### A. Small Business Economic Assistance Program

###### BACKGROUND

ARP Staff has been meeting with business owners to obtain signatures for funding contracts. Staff is working diligently to move these executed contracts through the County's workflow and purchase order processes. The ARP Staff Committee is performing final reviews on applications not recommended for funding by the Small Business Review Panel and sending out determination letters to those applicants.

Staff is also conducting final programmatic reviews on applications in Steps 3 and beyond to bring final program recommendations to the ARP Committee at a future meeting.

###### RECOMMENDATION / PROPOSED ACTION

No action is required for informational purposes only.

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Tye Vaught, Chief of Staff, provided the following information as an update on the Small Business Economic Assistance Program and responded to questions that followed.

Applications approved for funding: 39

Fully executed contracts: 10

Signed and in workflow: 21

Waiting on documents: 6

Withdrew from process: 2

Pending ARP Staff Committee recommendation: 64

In Programmatic Review: 15

Application Determination: 49

Discontinued applications: 56

B. Aid to Non-Profit Organizations

BACKGROUND

At the September 6, 2022, American Rescue Plan Committee meeting, the Committee directed staff to do a deeper analysis of program budgets submitted by responsive proposals received through the Aid to Nonprofit formal RFP process.

In this analysis, staff has determined that significant portions of submitted budgets are for administrative costs. Sub-awards are capped at administrative expenses of 10% for either direct or indirect costs.

Staff is seeking the guidance of the ARP Committee on how to address this matter. If the ARP Committee wishes to move forward with the current proposals, County Purchasing can submit a final Request for Clarification requesting the remaining responsive nonprofits submit revised budgets and amend their scopes of works based on their fixed capacity based on the amended budgets.

The Committee may reject all proposals and direct staff to administer aid to nonprofits through an alternative method.

Staff is seeking feedback from the ARP Committee.

RECOMMENDATION / PROPOSED ACTION

No action is required for discussion and informational purposes only

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Mr. Vaught reviewed a handout of non-profit projects by ARP expenditure categories included herein at Attachment A. Mr. Vaught stated concerns had been expressed about administrative costs, so staff took a deeper dive and looked at the project budgets; 17 were over the 10% cap for either direct or indirect administrative costs leaving 4 that were not over the 10% cap for administrative costs. Mr. Vaught stated being over the 10% cap for administrative costs calls into question the responsiveness of the proposals.

Commissioner Adams asked staff to take out the percentage or dollar amount of administrative costs in each proposal to see what each nonprofit would be eligible for and the determine whether the programs could be carried out for that amount of money. Ms. Cannon stated the next question would then be whether the number served would be reduced. Mr. Vaught stated the path forward would be for the Purchasing Division to reach out to the nonprofits and let them know they are over administrative costs and need to adjust their budgets which will likely impact their scope of work and units of service. Mr. Vaught stated this may change the amount and the way they were scored, so the committee that conducted the scoring may need to reconvene to re-evaluate.

Commissioner Keefe posed questions about the duplication of benefits under the category of Household Assistance: Rent, Mortgage and Utility Aid. Ms. Cannon stated there is no way to verify duplication of benefits under this category which is a concern relative to this category. Discussion followed about administration costs, services to be provided and the nonprofit proposals. Mr. Moorefield stated if the committee knows it has a certain area on which it wants to focus, then it can reject all the bids and amend and send them out again. Ms. Cannon suggested the committee could consider rejecting all proposals and do subawards for those the committee deems meets its ARP priorities. Ms. Cannon stated Finance concurs with this suggestion. Discussion continued.

MOTION: Commissioner Stewart moved to reject all nonprofit proposals and begin the process to consider subawards.  
SECOND: Commissioner Keefe  
VOTE: UNANIMOUS (3-0)

Consensus followed to move Item 4.C. Status of Subawards with CFVH, FSU, and FTCC after Item 4.E. Provision for Restoring Pre-pandemic Employment Levels as requested by Commissioner Adams.

#### D. Health Insurance Fund Reimbursement Eligibility

##### BACKGROUND

Blue Cross Blue Shield has been periodically providing staff with a claims report that shows total costs of paid COVID-19 claims broken down by testing, vaccinations, and treatment. There is an opportunity to reimburse the County's Health Insurance Fund from the ARPA fund based on the report of actual claims paid to date of approximately \$1.2 million. This reimbursement could partially offset the impact COVID has had on overall claims increases (directly and indirectly) over the past two years. Preliminary reports show a decrease to fund balance of the Health Insurance fund of \$3.1 million for the fiscal year ended June 30, 2022.

Each of the three service types (testing, vaccination, treatment) are assigned to an ARPA allowable expenditure category and are cited as an eligible use and is allowed per the Final Rule and state statute. This information has been verified by the County Attorney's Office.

##### RECOMMENDATION / PROPOSED ACTION

No action is required. For discussion and informational purposes only.

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Vicki Evans, Finance Director, presented the background information recorded above. Commissioner Keefe stated he is not going to vote in favor of this item because it is one more case of spending but not investing in capital because once the \$1.2 million is gone, it is gone.

MOTION: Commissioner Adams moved to use ARPA funds to reimburse the County's Health Insurance Fund in the amount of \$1.2 million for what can be substantiated.

SECOND: Commissioner Stewart  
VOTE: PASSED (2-1) (Commissioners Adams and Stewart voted in favor; Commissioner Keefe voted in opposition)

E. Provision for Restoring Pre-pandemic Employment Levels

BACKGROUND

The United States Department of the Treasury's ARPA final rule provides two options to restore pre-pandemic employment, depending on the recipient's needs. Under the first and more straightforward option, recipients may use SLFRF funds to rehire staff for pre-pandemic positions that were unfilled or eliminated due to the pandemic without further analysis. Under the second option, the final rule allows recipients to hire above the prepandemic baseline by adjusting the pre-pandemic baseline for historical growth in public sector employment over time and flexibility in hiring roles. Recipients may choose between these options but cannot use both.

Staff recommends that the ARP Committee consider Option 2. There are four steps needed to utilize this option.

- Step One: Identify the recipients' budgeted FTE level on January 27, 2020. This includes all budgeted positions, filled and unfilled. This is called the pre-pandemic baseline.
- Step Two: Multiply the prepandemic baseline by 1.075 (1 + adjustment factor). This is called the adjusted pre-pandemic baseline.
- Step Three: Identify the recipient's budgeted FTE level on March 3, 2021, which is the beginning of the performance period for SLFRF funds. This is called the actual number of FTEs.
- Step Four: Subtract the actual number of FTEs from the adjusted prepandemic baseline to calculate the number of FTEs hired and covered by SLFRF funds.

Recipients may use SLFRF funds to cover payroll and covered benefit costs obligated by December 31, 2024, and expended by December 31, 2026, up to the number of FTEs calculated in Step Four, consistent with the Uniform Guidance's Cost Principles at 2 CFR part 200 Subpart E. Recipients may only use SLFRF funds for additional FTEs hired over the March 3, 2021, level of budgeted FTEs.

Staff recommends using the pre-pandemic employment funding category to draw down ARPA funds for ARPA projects without the added reporting requirements and limitations imposed the federal guidance. Staff believes that the amount of funds that can be supplanted opens up a very significant opportunity that can potentially free up dollars into the \$30+ million range to use for County ARPA priorities without the stringent federal limitations.

Staff has worked with North Carolina Association of County Commissioners and the UNC School of Government partners to gain feedback on this potential initiative.

## RECOMMENDATION / PROPOSED ACTION

No action is required for discussion and informational purposes only

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Ms. Cannon stated the intent is not for the money to stay with the county as the item might suggest, but due to the onerous process trying to comply with Treasury and state law, this particular mechanism could free up ARPA dollars. Ms. Cannon stated the ARPA dollars could be moved to the General Fund, segregated and only used for ARP priorities. Ms. Cannon stated the funds would not be subject to Treasury guidelines or deadlines.

Tye Vaught, Chief of Staff, took the committee through the following and stated 96.01 FTEs is the amount the county can claim going back to March 3, 2021, for salaries and fringe benefits paid by the county. Mr. Vaught stated the county is eligible to claim 167.02 FTEs under the program and has the additional 71.01 FTEs it can use through 2024 for positions that are added through the budget process. Mr. Vaught responded to questions that followed.

### Pre-Pandemic Employment

- Step One: Identify the recipients' budgeted FTE level on January 27, 2020. This includes all budgeted positions, filled and unfilled. This is called the pre-pandemic baseline.

**2,373.70**

- Step Two: Multiply the pre-pandemic baseline by 1.075 (1 + adjustment factor). This is called the adjusted pre-pandemic baseline

$2373.70 \times 1.075$

**2,551.72**

- Step Three: Identify the recipient's budgeted FTE level on March 3, 2021, which is the beginning of the performance period for SLFRF funds. This is called the actual number of FTEs.

**2,384.70**

- Step Four: Subtract the actual number of FTEs from the adjusted pre-pandemic baseline to calculate the number of FTEs hired and covered by SLFRF funds.

$2,551.72 - 2,384.70$

**167.02**

- Current budgeted positions as of October 13, 2022

**2480.71**

- Number of Current budgeted positions over the Actual FTE positions as of March 3, 2021

$2,480.71 - 2,384.70$

**96.01**

- Remaining eligible FTEs

$167.02 - 96.01$

**71.01**

MOTION: Commissioner Adams moved to restore pre-pandemic employment levels.

SECOND: Commissioner Stewart

VOTE: UNANIMOUS (3-0)

C. Status of Subawards with CFVH, FSU, and FTCC

BACKGROUND

As previously discussed, federal and state requirements for contracting or sub-awarding ARPA funds is cumbersome and time consuming both for the vendor/subrecipient and for county staff. Specific to the sub-award process, Finance staff have been working with staff of Cape Fear Valley Health (Narcan distribution project and Community Paramedics project), Fayetteville State University (Small Business Enterprise project), and Fayetteville Technical Community College (HOPE: Hope, Opportunity, Prosperity through Education project) on documentation requirements of sub-awards.

Each of the three entities is at a different stage of the documentation submission and review process which is required before a subrecipient risk assessment can be conducted. Finance staff are currently awaiting feedback from CFVH on needed policy changes and other documentation items for both projects. FSU described a project that does not meet ARPA eligibility criteria which will require the county to provide a different funding source for the county contribution amount. FTCC has submitted all required documentation including board approved policies which has moved them forward to finance staff conducting the risk assessment process.

To provide perspective, a sample letter to potential subrecipients showing required documentation and questionnaire is included herein as Attachment B. Templates provided by the UNC School of Government were utilized to create the documentation requirements.

RECOMMENDATION / PROPOSED ACTION

No action is required. For discussion and informational purposes only.

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Ms. Evans presented the background information recorded above. Ms. Evans stated FTCC completed the risk assessment October 12, 2022, and were rated low risk. Ms. Evans stated risk assessment ratings are low, moderate, or high. Ms. Evans stated FTCC's information has been forwarded to the County Attorney's Office and the next step is the contract. Ms. Evans spoke to the status of the documentation submission and review process for CFVH and FSU. Ms. Evans stated Alliance Health also has a Community Paramedics project and Finance staff are still working on that piece. Ms. Evans responded to questions that followed.

Ms. Evans stated FSU's project description does not meet federal requirements. Commissioner Adams stated following approval of Item 4.E., subawards for CFVHS and FSU can now be paid out of those funds because it will be cleaner, easier and they will not have to undergo the risk assessment. Ms. Evans stated on the back end of the federal requirements, FTCC will have to undergo the monitoring process and comply with the audit requirements.

MOTION: Commissioner Adams moved to approve funds for FSU and CFVHS once ARPA funds have been moved to the General Fund.

SECOND: Commissioner Stewart

VOTE: UNANIMOUS (3-0)

Ms. Evans clarified staff can initially draw the amount that was incurred between March of 2021 to the present and that is the funding that can be worked with right now. Ms. Evans stated then each year, there will be another amount to add.

## 5. OTHER ITEMS

Mr. Vaught provided an update on the following current ARP projects:

### Mortgage Assistance/ First-Time Homebuyers

Mr. Vaught stated these programs are similar and also similar to rental assistance. Mr. Vaught stated the AMI threshold for these programs is very high in order to qualify and he is not certain that individuals who could take part in the programs would necessarily benefit from it. Mr. Vaught stated individuals receiving these funds would also be accountable for the tax liability of taking on the funds.

### Affordable Housing (Shaw Heights Neighborhood)

Ms. Cannon stated the environmental has been completed and soils are suitable for a multi-housing project. Ms. Cannon stated the staff committee needs to meet and discuss how to move forward.

### Sanitary Sewer (Shaw Heights Neighborhood)

Ms. Cannon stated the same obstacles remain and have yet to be overcome. Ms. Cannon stated the monthly bills are going to be extremely expensive and in previous discussions with the City, they are going to require annexation which creates another financial burden for the homeowners in that area. Ms. Cannon stated the system cannot be built for prospective owners, only current owners.

### Water System (Gray's Creek Water and Sewer District)

Ms. Cannon stated work continues to identify a water source with information to be provided in the next 45 to 60 days.

### Broadband

Mr. Vaught stated the original allocation was for \$1M and now it is down to \$300,000; the units of service are at 758 but additional units may be picked up along the way as the fiber is run to the 758 units. Mr. Vaught stated discussion is underway to see how to move forward with a partnership agreement with a potential provider.

### Historic Courthouse (BOC Meeting Room)

Ms. Cannon stated the County Attorney defined that ARP money could be used for the ventilation system and major repairs. Ms. Cannon stated the Historic Courthouse is part of the consideration for a General Government Services building. Ms. Cannon stated the Board has not come to a decision about the future use of the Historic Courthouse, but everyone agrees it does need to be upgraded. Ms. Cannon stated by survey, the Board did make a decision not to have the Board of Commissioners located at the Historic Courthouse.

## 6. ADJOURN

Commissioner Keefe stated the opioid crisis continues to worsen in our community and the county does not seem to be embracing the crisis as well as it should. Commissioner Keefe stated CFORT was stood up almost four years ago yet the numbers continue to climb. Commissioner Keefe stated his concern is that many times when first responders go to rural areas, they do not have the equipment to save lives. Commissioner Keefe stated he believes this is the county's responsibility, yet he was told that opioid funding can only be used for post-overdose and recovery, and that Narcan is used during overdose. Commissioner Keefe stated that is unacceptable because if an individual does not survive an overdose, there will never be a post-overdose or recovery. Commissioner Adams suggested having someone from the volunteer fire departments serve on the opioid committee to talk about these issues, regardless of whether ARPA or other funds are used.

MOTION: Commissioner Adams moved to adjourn.  
SECOND: Commissioner Stewart  
VOTE: UNANIMOUS (3-0)

There being no further business, the meeting adjourned at 1:05 p.m.

Approved with/without revision:

Respectfully submitted,

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Candice H. White  
Clerk to the Board

## NON-PROFIT PROJECT BY ARP EXPENDITURE CATEGORY

**\*\*Projects over 10% administrative costs are ineligible\*\***

### 1.11 Community Violence Interventions

- 20. Rape Crisis Volunteers of Cumberland County
  - Score: 50
  - Project: Victim Services
  - Funds Requested: \$111,171
  - Over Admin?: **Yes**

### 1.2 COVID-19 Testing

- 10. Community Health Interventions Inc.
  - Score: 59
  - Project: CHI COVID-19 Mitigation Initiative
  - Funds Requested: \$175,596.40
  - Over Admin?: **Yes**

### 1.6 Medical Expenses (including Alternative Care Facilities)

- 9. Better Health of Cumberland County
  - Score: 59
  - Project: Medical Emergency Direct Aid Program
  - Funds Requested: \$258,210
  - Over Admin?: **Yes**

### 1.7 Other COVID-19 Public Health Expenses (including Communications, Enforcement, Isolation/Quarantine)

- 5. Cumberland HealthNet
  - Score: 73
  - Project: Safe Haven
  - Funds Requested: \$500,000
  - Over Admin?: **Yes**

### 1.9 COVID-19 Assistance to Non-Profits

- 19. Cumberland Residential and Employment Services and Training
  - Score: 50
  - Project: Adult Day Vocational Program
  - Funds Requested: \$123,130
  - Over Admin?: **Yes**

### 2.1 Household Assistance: Food Programs

- 3. Carolina Collaborative Community Care, Inc.
  - Score: 75
  - Project: Murchison Choice Food: Healthy Food, Healthier Living
  - Funds Requested: \$508,195.24

- Over Admin?: **Yes**
- 6. Cumberland County Council on Older Adults
  - Score: 72
  - Project: Meals on Wheels
  - Funds Requested: \$476,615
  - Over Admin?: **Yes**
- 14. Noonday Kitchen
  - Score: 53
  - Project: Sunshine Market
  - Funds Requested: \$348,744
  - Over Admin?: **No**

#### **2.10 Assistance to Unemployed or Underemployed Workers (e.g. job training, subsidized employment, employment supports or incentives)**

- 7. Employment Source Inc. dba ServiceSource
  - Score: 63
  - Project: Building Independence
  - Funds Requested: \$159,826.34
  - Over Admin?: **Yes**

#### **2.14 Healthy Childhood Environments: Early Learning**

- 17. Carolina Collaborative Community Care, Inc.
  - Score: 52
  - Project: Child Development Enhancing Futures (CDEF)
  - Funds Requested: \$291,912.29
  - Over Admin?: **Yes**

#### **2.18 Housing Support: Other Housing Assistance**

- 8. Connections of Cumberland County, Inc.
  - Score: 63
  - Project: Day Resource Center
  - Funds Requested: \$438,510
  - Over Admin?: **Yes**
- 15. The Joel Fund
  - Score: 53
  - Project: Operation Furnish, Operation Wellness, and Resource Connection
  - Funds Requested: \$182,696
  - Over Admin?: **Yes**

#### **2.2 Household Assistance: Rent, Mortgage, and Utility Aid**

- 1. Fayetteville Urban Ministry, Inc.
  - Score: 90
  - Project: Fayetteville Urban Ministry's Coronavirus Recovery Project
  - Funds Requested: \$750,000
  - Over Admin?: **Yes**
- 18. FTCC Foundation Inc.

- Score: 50
- Project: Barriers to Education for At Risk Students
- Funds Requested: \$369,500
- Over Admin?: **No**

## **2.22 Strong Healthy Communities: Neighborhood Features that Promote Health and Safety**

- 4. Healing Hands of Love Kingdom Connections International
  - Score: 74
  - Project: The Healing Hands of Love Kingdom Connections International's Youth Empowerment Center
  - Funds Requested: \$80,750
  - Over Admin?: **No**

## **2.24 Addressing Educational Disparities: Aid to High Poverty Districts**

- 2. Arts Council of Fayetteville/Cumberland County
  - Score: 75
  - Project: Artists in Schools – Arts for All Allocation (Title 1 Schools)
  - Funds Requested: \$150,000
  - Over Admin?: **Yes**

## **2.25 Addressing Educational Disparities: Academic, Social and Emotional Services**

- 11. Communities in Schools of Cumberland County
  - Score: 57
  - Project: Reengaging and Supporting Middle and High School Students Affected by COVID-19
  - Funds Requested: \$507,185
  - Over Admin?: **Yes**
- 12. Cape Fear Botanical Garden
  - Score: 57
  - Project: Cape Fear Botanical Garden COVID-19 Recovery and Revitalization Initiative
  - Funds Requested: \$243,344
  - Over Admin?: **No**
- 13. Kingdom Community Development Corporation
  - Score: 55
  - Project: Windows to the World
  - Funds Requested: \$1,278,756.74
  - Over Admin?: **Yes**
- 16. The School of Hope, Inc
  - Score: 53
  - Project: Keep Hope Alive
  - Funds Requested: \$313,308.04
  - Over Admin?: **Yes**
- 21. Communities United for Youth Development (CUYD)
  - Score: 45
  - Project: Building a Better Community: "Grays Creek Strong"
  - Funds Requested: \$400,000

- Over Admin?: **Yes**

#### **Nonprofit By Expenditure Category Recommendation Order:**

1. Fayetteville Urban Ministry, Inc (EC #2.2)
2. Arts Council of Fayetteville/Cumberland County (EC #2.24)
3. Carolina Collaborative Community Care, Inc. (Murchison Choice Food: Healthy Food, Healthier Living; EC #2.1)
4. Healing Hands of Love Kingdom Connections International (EC #2.22)
5. Cumberland HealthNet (EC #1.7)
6. Cumberland County Council on Older Adults (EC #2.1)
7. Employment Source Inc. dba ServiceSource (EC #2.10)
8. Connections of Cumberland County, Inc. (EC #2.18)
9. Better Health of Cumberland County (EC #1.6)
10. Community Health Interventions Inc. (EC #1.2)
11. Communities in Schools of Cumberland County (EC #2.25)
12. Cape Fear Botanical Garden (EC #2.25)
13. Kingdom Community Development Corporation (EC #2.25)
14. Noonday Kitchen (EC #2.1)
15. The Joel Fund (EC #2.18)
16. The School of Hope, Inc (EC #2.25)
17. Carolina Collaborative Community Care, Inc. (Child Development Enhancing Futures [CDEF]; EC #2.14)
18. FTCC Foundation Inc. (EC #2.2)
19. Cumberland Residential and Employment Services and Training (EC #1.9)
20. Rape Crisis Volunteers of Cumberland County (RCVCC) (EC #1.11)
21. Communities United for Youth Development (EC #2.25)

**Vicki Evans**  
Finance Director  
General Manager of Financial Services



**Ivonne Mendez**  
Deputy Finance Director

**Robert Tucker**  
Accounting Supervisor

DATE

NAME  
ENTITY  
EMAIL ADDRESS

Dear \_\_\_\_\_,

Documentation requirements and multiple questions to address Cumberland County's legal requirements, project eligibility determination, and the subrecipient risk assessment are provided within the listing that follows. Please electronically submit this information to Cumberland County's ARPA Finance Accountant. After receipt of all documentation and responses, finance staff will review for completeness and communicate back to your entity if further information is needed. Once documentation requirements are met and questions are satisfactorily addressed, finance staff will begin the risk assessment process.

If you have questions or need technical assistance in providing this information, please email me at [\\_\\_\\_\\_@cumberlandcountync.gov](mailto:____@cumberlandcountync.gov).

Respectfully,

ARPA Finance Accountant

Attachments:      Eligibility Determination Form  
                         MS Excel Proposed Project Budget delineated by Cost Item for Allowable Cost Review  
                         Cumberland County Subaward Policy Appendix 3

Important Note: Any expenditures prior to an execution of a subaward will not qualify for ARPA funds or reimbursement.

**Legal Purposes:**

1. Names and addresses of all members of board of directors
2. Names and addresses of all officers
3. Copies of declarations page of any liability insurance
4. Most recently filed Form 990

**Project Eligibility Determination:**

5. Complete the attached Eligibility Determination Form
  - a. Section I, Basic Information and Description (Required)
  - b. Section II, 1 – 2 as applicable (Required)
  - c. Section II, 3 – 6 is not applicable to subrecipients (do not complete)
  - d. Section III, Proposed Project Budget, delineated by Cost Item for Allowable Cost Review – Format must conform to the attached MS Excel Workbook. If applicable, include personnel/pay policies that allow payment of stipends and use of interns if administered. If these funds will be used to pay employers, please provide a policy outlining that process.
6. Project Description must include
  - a. Defined Scope of Work with measurable goals/outcomes identified.
  - b. Service Population, i.e., low moderate-income and qualified census track
  - c. Any plans to subcontract work and description. Be aware that if ARP funds are used to subcontract, this same information being requested of the subrecipient must also be provided by the subcontractor. Yes/no (if yes, must have implemented a Policy for Subaward and Monitoring following the UNC-SOG policy template)
  - d. Any program income earned? Yes/no (if yes, must be documented in proposed project budget)
  - e. Any in kind or cash contribution to support the subaward? Yes/no (if yes, must be documented in proposed project budget)

**For Subrecipient Risk Assessment**

7. Tax ID#, current W-9, NC Secretary of State Proof of Active Business Registration, Unique Entity Identifier (UEI) number (to be used to validate eligibility in SAM – *Subrecipient Name on all documents must match name associated with the UEI in SAM.*)
8. Must adopt and implement all required Uniform Guidance policies and procedures consistent with ARP/CSLFRF requirements. Please provide a copy of each policy described in a – g. *For information regarding the ARP/CSLFRF requirements and sample policies, refer to the UNC School of Government webpage <https://arpa.sog.unc.edu/document-share/> as well as the County ARPA webpage <https://www.cumberlandcountync.gov/departments/commissioners-group/commissioners/american-rescue-plan/reports>*
  - a. Allowable Cost Principles Policies (*NEED POLICY FOLLOWING UNC-SOG TEMPLATE.*)
  - b. Eligibility Determination Policy (*NEED POLICY FOLLOWING UNC-SOG TEMPLATE.*)
  - c. Non-Discrimination Policy (*NEED POLICY FOLLOWING UNC-SOG TEMPLATE.*)
  - d. Conflict of Interest Policy (*NEED POLICY FOLLOWING UNC-SOG TEMPLATE.*)
  - e. Records Retention Policy and Close-Out Provisions (*NEED POLICY FOLLOWING UNC-SOG TEMPLATE.*)
  - f. Policy for Subaward and Monitoring (if applicable see 6. c.) (*NEED POLICY FOLLOWING UNC-SOG TEMPLATE.*)
  - g. Uniform Guidance Policies (see Cumberland County Purchasing Policy No. 3-3, Addendum that starts on page 4.
9. Questionnaire (Evidence may be requested to be provided in a follow up meeting or during a monitoring visit.)
  - a. Is the entity's facility, equipment, supplies, and staffing adequate for the needs of the award? Yes/no
  - b. Is the entity properly licensed or certified by a recognized source? Yes/no If yes, what source? (For example, the IRS non-profit determination letter)
  - c. Does the entity have a Code of Ethics Policy which is provided to all associated employees? Yes /no

- d. Does the entity have a financial management system that provides records that can identify the sources and application of funds for subaward funded activities? Yes/no
- e. Does the entity's financial system provide for the control and accountability of project funds, property, and other assets? Yes /no
- f. What is the current staffing level of the entity (percentage)?
- g. Document key staff changes in the entity during the past two years.
- h. What is the entity's staff's experience in performing stated activities in the proposed subaward?
- i. Does the entity have a formal, written personnel policy that addresses: (Yes/no to each)
  - i. Pay rates & benefits
  - ii. Time and attendance
  - iii. Leave
- j. Does the entity have sufficient internal controls related to the subaward funds? (Segregation of duties) Yes /no
- k. Awarded funds will be paid on a reimbursement basis with sufficient documentation requirements. Does the entity have sufficient cash flow to carry out the subaward terms? Yes/no
- l. Has the entity previously done work for the federal government? How many years of experience does your entity have administering federal awards?
- m. Is the entity experienced in managing federal funds of the scope/dollar amount in this proposed subaward? How many federally funded programs in this amount or above, has your entity administered over the past ten years?
- n. Identify any monitoring interventions the entity is currently subject to related to other federal grant awards.
- o. Does the entity maintain an inventory of federal government property that, at a minimum identifies purchase date, cost, vendor, description, serial number, location, and ultimate disposition data? Yes /no
- p. Does the entity have a designated federal cognizant audit agency? If yes, provide name of audit agency.
- q. When was your entity's most recent single audit? Provide a copy or link to the single audit. Have all audit findings been resolved?
- r. What is the entity's total overall annual budget? \$\_\_\_\_\_ What percentage of the entity's overall annual budget will this subaward comprise? \_\_\_\_\_%

#### Monitoring

10. See attached Subaward Policy – Appendix 3. The monitoring specifics start on page 4. Subrecipient must be able to demonstrate compliance to all applicable sections. Acknowledge ability to demonstrate as: Yes/no