



**POLICY:** ARPA Funds Policy

**EFFECTIVE DATE:** 07/22/2024  
**REVISION DATE:** 05/26/2025

**POLICY NUMBER:** PROG\_012023\_800

**RESPONSIBLE PARTIES:** All WSM employees, contractors, and subrecipients engaged in SLFRF-funded activities

### **PURPOSE:**

The purpose of this communication is to establish policy and provide guidance to WSM Business Solutions and Finance team members on the implementation, and management of Funds under the American Rescue Plan Act (ARPA)

### **1. Purpose**

This policy provides guidance for the administration and oversight of SLFRF funds at WorkSource Montgomery (WSM). SLFRF funding, received through the American Rescue Plan Act (ARPA), supports the public health and economic recovery efforts in Montgomery County. WSM implements activities under the Relief Act, ARPA Tranche I and II, and Jobs That Build to serve disproportionately impacted populations and local businesses.

### **2. Allowable Activities**

WSM uses SLFRF funds to support eligible activities under the following categories:

- Relief Act: Occupational training, program development, and enhancements to service delivery.
- ARPA Tranche I & II: Job training, workforce services, wraparound supports, apprenticeships, wage subsidies, youth programming, and employer engagement.
- Jobs That Build: Employer-driven solutions for workforce participation and retention, especially in infrastructure sectors.

All activities must:

- Respond directly to COVID-19 public health or economic impacts.
- Be proportional and supported by documentation of impact.



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Examples of eligible services include:

- Occupational and pre-apprenticeship training
- Rental, food, or utility assistance
- Mental health or trauma recovery services
- Youth summer employment programs
- Wage subsidies to small and minority-owned businesses

### 3. Eligible Populations

WSM prioritizes services to:

- Unemployed and underemployed individuals
- Low- and moderate-income households
- Veterans, youth (16-24), and individuals with disabilities
- English language learners
- Returning citizens
- Residents of Qualified Census Tracts and high-poverty areas

Eligibility must be documented through:

- Self-attestation
- Program enrollment documentation
- Verification of participation in federal or state assistance programs

### 4. Reporting Requirements

All SLFRF-funded projects require quarterly program and fiscal reporting. Reports are submitted to MD Labor using the naming convention provided in state guidance.

Due Dates:

- Quarterly program and fiscal reports: Submitted by the 1st of the month following the end of each fiscal quarter.
- Final closeout report: Due upon project completion.

WSM collects and reports the following metrics:

- Number of individuals served
- Credentials earned
- Apprenticeship enrollment
- Employer and business participation

Local metrics include:

- Job placement and retention rates



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- Completion of training programs
- Engagement with targeted populations
- Equity and opportunity mapping benchmarks

## 5. Monitoring and Compliance

WSM's Performance and Compliance Department monitors all SLFRF-funded activities. Monitoring includes:

- Monthly fiscal and performance reviews
- Random file audits
- Subrecipient site visits
- Risk assessments and remediation follow-up

Subrecipients must maintain compliance with:

- Federal Uniform Guidance (2 CFR Part 200)
- State and local procurement, reporting, and financial controls
- Non-discrimination and language access requirements

## 6. Record Retention and Security

All records must be retained for five years following grant closeout or until all audits and legal matters are resolved.

Personally Identifiable Information (PII) must be:

- Encrypted or password-protected when transmitted electronically
- Stored in locked file cabinets or restricted-access digital systems
- Handled in compliance with TEGL 39-11 and WSM data security policies

All subrecipients must have a Unique Entity Identifier (UEI) and be registered in SAM.gov.

## 7. Equity and Community Engagement

WSM uses Opportunity Mapping to target resources to areas of greatest need and directs at least 60% of services to high-poverty tracts. We engage stakeholders via roundtables, community forums, and direct partnerships with local organizations.

Equity is ensured through:

- Data disaggregation by race, ethnicity, and geography
- Targeted outreach to underserved groups
- Adjustments to program design based on community feedback



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## 8. Contact

For questions about this policy or SLFRF program implementation, contact:

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