



ARPA Reporting and Requirements

*(*This is a summary of the ARPA documents and MOUs related to Board grant funds for this cycle)*

- Records Maintenance - 5 years after end of Period of Performance (POP)
- No Pre-award Costs (If you have purchased items and expended funds prior to applying for a grant, you could possibly use those funds as an In-kind match as part of the Board's grant program)
- >\$25,000 you must verify that the person with whom you intend to do business is not excluded or disqualified
- Federal Statutes & Regulations prohibiting discrimination
 - Title VI Civil Rights Act
 - Fair Housing Act
 - Section 504 of Rehabilitation Act - disability
 - Age Discrimination Act of 1975
 - Encourage Seat Belt Use
 - Texting while driving policy
 - Acknowledge federal Executive Order 13166 "Improving Access to Services for persons with Limited English Proficiency"
- Hatch Act - no lobbying if funded by Federal dollars
- False Statements
- Publication Statement acknowledging funding source
- >\$250,000 contract must have Remedies Clause
- >\$10,000 contract must have Termination Clauses
- Contracts must have Equal Opportunity Clause
- Construction Contract >\$2,000 must have provision for the Davis-Bacon Act and Anti-kickback clauses
- Employment of mechanics/laborers \$100,000 must comply with work hours and safety standards Act
- >\$150,000 must comply with Clean Air Act
- Contract must not be awarded to parties listed on the governmentwide exclusions list
- >\$100,000 contractor must file certification required by Byrd Anti-Lobbying Amendment

Contracts

- All consultant and contractual services shall be supported by written contracts stating the services to be performed, rate of compensation and length of time over which the services will be provided. (2 CFR Appendix II to Part 200—Contract Provisions for Non-Federal Entity Contracts Under Federal Awards)



- A copy of the contract agreement must be sent to the Board and DPS for review or be available for review prior to the execution of the contract. (Article 1 Sec 4b)

Procurement rules of the Counties must be documented and retained:

- Single vendor purchase less than \$10k may be purchased with prudence on the open market
- Purchases between \$10k and \$100k to a single vendor must be competitively bid but does not need mail or advertisement.
- Purchases over \$100k to a single vendor shall be advertised for bids in newspapers at least 5 days prior to bids being opened.
- If only one bid is received it's deemed to be sole source
- The Board and DPS have to approve sole source purchases \$10k and over prior to purchasing. (Article 1 Sec6)

Documentation required for reimbursement:

- Vendor Invoice
- Purchase Order
- Proof of payment (copy of cancelled check or credit card statement)
- Proof of delivery/completion (packing slips, receipts, signed statements indicating delivered or services performed)
- Copy of signed contract and corresponding documentation required in the contract (milestone reports, time and effort)(Article 1 Sec 7)

Procurements Must meet Buy American and Buy Missouri Legislation (Article 1 Sec 8 & 9)

Monitoring (Article 1 Sec 13)

- The Missouri 911 Service Board will need to maintain necessary records to evaluate the effectiveness of the projects it approves and will need to be available to DPS upon their request.
- Includes fund accounting, auditing, monitoring and evaluation procedures for projects.

Law Enforcement Agency Requirements (Article 1 Sec 14a-k)

- Must submit MIBRS crime incident reports to DPS as prescribed by DPS and submit any other info as required by DPS.
- If an agency is not in compliance with Section 43.505 RSMo they can only apply for grant funds to assist in becoming compliant. Non-Compliance is defined for grant-eligibility as an LE agency that has not submitted NIBRS reports for 3 or more months since January 1, 2022.
- Vehicle Stops, must be in compliance with Section 590.650 RSMo (Racial Profiling) for the duration of the project period.



- Use of Force reporting – must be in compliance with Section 590.1268 RSMo relating to use of force incident reporting standards and procedures and publication of report data and analysis reports
- Federal Equitable Sharing Funds – must be in compliance with Section 513.653 RSMo relating to participation in the federal forfeiture system and the reporting of proceeds to the MO State Auditor.
- ARPA Data reporting – must agree to submit any data or statistical reports required for the ARPA program.
- Body Armor – if any ARPA dollars are spent on body armor must meet latest NIJ ballistic or stab standards and must be made in the US.
- Body-Worn Camera – if ARPA dollars are spent on body-worn cameras there must be written policies and procedures in places related to usage, data storage and access, privacy considerations, training, etc.
- Rap Back Program – compliance with Section 590.030 RSMo (Basic Training requirements for peace officers) has to enroll in state and federal rap back programs, and requires fingerprints and enrollment for commissioned officers is maintained.
- Custodial Interrogations – must be in compliance with Section 590.700 RSMo and have written policies to record custodial interrogations of suspects related to subsection 2.

SFLF Compliance Reporting document attached

- Grantees must maintain records for 5 years after all funds have been expended or returned to the Board. Records need to be collected, transmitted and stored in open and machine-readable formats.
- Conflict of Interest policy documentation consistent with [2 CFR 200.318\(c\)](#) any conflict of interest must be reported to the Board and DPS.

Improving Access to Services for Persons with Limited English Proficiency

- (DPS MOU pgs. 10 & 11) Applicants and recipients are encouraged to ensure their PSAP has access to 24/7 language interpretive services like Language Line, etc.

**This is a summary of the ARPA documents and MOUs related to Board grant funds for this cycle. For full documentation refer to the SLFRF – Compliance and Reporting Guidance 9-20-22 from the US Dept. of Treasury and the Subaward MOU from MO Dept. of Public Safety to the Missouri 911 Service Board. The information compiled in this summary by the Missouri 911 Service Board is for general informational purposes only. All information in this document is a summary of the ARPA documents and MOUs related to Board grant funds for this cycle of funding. This information is provided in good faith; however, we make no representation or warranty of any kind, express or implied regarding the*



complete accuracy, complete validity, complete reliability, or completeness of any information in this document. If you have further questions or need further detail regarding requirements you must research the SLFRF – Compliance and reporting Guidance 9-20-22 from the US Dept. of Treasury and the Subaward MOU from MO Dept. of Public Safety to the Missouri 911 Service Board and any referenced Codes of Federal Regulations, and/or contact Missouri 911 Service Board staff for additional assistance.