

State of Vermont
State Fiscal Recovery Fund
Process and Policy Guidance

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(updates from v3 are highlighted in yellow)

COVID-19 Financial Office



Contents

I.	Introduction	4
II.	Important Terms Used in this Guidance	4
III.	Vermont Policy Regarding Prioritization of Funding.....	5
IV.	Initial SFR Appropriation Approval and Release Process	6
A.	SFR Questionnaire—New Programs Approval.....	6
1.	The SFR Questionnaire	7
2.	Federal Award Classification Checklist and Uniform Guidance	7
3.	SFR Questionnaire Submission	8
4.	SFR Questionnaire Approval Process.....	8
B.	Initial FFP Team Approval to Establish Spending Authority.....	9
C.	Initial Appropriation Spending Authority and FFP-Approved Amount.....	9
1.	For low-risk appropriations that require FFP review	9
2.	For low-risk appropriations that do not require FFP review	10
3.	For moderate- and high-risk appropriations that require FFP review.....	10
4.	For moderate- and high-risk appropriations that do not require FFP review	10
V.	Spending Authority for Additional Projects Under a Released Appropriation	10
VI.	Launching Grant Projects, Beneficiary Projects, and Contracts.....	11
A.	Launching Grant Projects	11
1.	Award Letter	11
2.	Exhaustion of Funds	11
3.	Grant Tracker	11
4.	Assurances	11
B.	Launching Beneficiary Projects	12
1.	Award Letter	12
2.	Assurances	12
C.	Launching Contracts.....	12
VII.	Reporting Requirements.....	12
A.	Equity Impact Assessment	12
B.	Expenditure Category	12
C.	Required Treasury Reports	13
1.	Quarterly Expenditure Reports.....	13
2.	The Recovery Plan Performance Report (annual).....	14

State Fiscal Recovery Fund Process and Policy Guidance

VIII. Records Maintenance 16

IX. Appendices and Links..... 17

 Appendix 1 - FFP Review by Appropriation 18

 1. Appropriations That Require FFP Review 18

 2. Appropriations That Do Not Require FFP Review 22

 Appendix 2 - Expenditure Categories 25

 Appendix 3 - Required Data for the Project and Expenditure Report 28

 Appendix 4 – Requirements for SFR Infrastructure Projects (over \$10 million) 32

I. Introduction

The Agency of Administration has established the COVID-19 Financial Office (CFO) to oversee the distribution of money for the State Fiscal Recovery (SFR) Fund. The CFO is charged with warranting Vermont's compliance with federal and state eligibility guidelines, documentation, and auditing conditions of COVID-19 federal funding.

This document is intended for Agencies and Departments that received SFR appropriations. It details the process and policies associated with obtaining and managing SFR funds. All SFR appropriation recipients that intend to use SFR funds for grant programs, beneficiary programs, and Agency or Department administrative expenses (including contracts and direct payments) are required to follow the outlined process, reporting, and record-retention requirements described in this document.

II. Important Terms Used in this Guidance

Appropriation: Funding outlined for a specific purpose in Vermont legislation or through the Excess Receipts process.

Program: Vermont SFR appropriations constitute SFR programs. SFR eligibility determinations, performed through the questionnaire process, are done at the program level by the CFO. In some cases, agencies and departments may receive multiple appropriations for the same program (if, for example, an additional tranche funding is appropriated for an existing program in subsequent legislation).¹

Project: A project is a set of closely related activities directed toward a common purpose, often (especially in the case of infrastructure projects), in a specific geographic region. The Federally Funded Projects Team review occurs at the *project* level. Programs may contain one or many projects, depending on the purpose of the appropriation. For example:

- An appropriation to the Agency of Commerce and Community Development for the purpose of establishing a statewide Economic Recovery Bridge Program to small businesses would be a *program* with one *project*
- An appropriation of \$50 million to the Department of Mental Health is one *program* to improve mental health services in the State, and it may include funding for a statewide mental health call center *project* and two different *projects* for facilities improvements at two different mental health providers in the State.

¹ In most cases, an appropriation will fund a single program. In rare instances, an appropriation may provide funding for several programs, that have different program design details, warranting the submission of multiple questionnaires for a single appropriation. If this case applies to your appropriation, please contact the CFO for further assistance.

III. Vermont Policy Regarding Prioritization of Funding

It is State policy, and the best practice for fellow Vermonters needing COVID-19 assistance, that SFR may only be used to cover expenses that are not eligible for FEMA-Public Assistance. If costs are FEMA-eligible and meet the minimum threshold required (\$3,300), Vermont entities should apply for FEMA funding before using any other federal funding sources. Consistent with this policy, SFR funds shall not be used to cover expenses that are FEMA eligible, unless explicitly authorized by the CFO. This policy is in place to ensure that SFR and other less restrictive funding sources are available for those COVID-19 needs that are not eligible for other, more restrictive sources of funding. For additional details, see the [FEMA Prioritization Memo](#).

While Vermont entities shall prioritize FEMA funding for eligible expenses, local education agencies with FEMA-eligible expenses under \$10,000 may wish to use their education-specific funding streams to cover these expenses without being required to apply to FEMA first for these expenses. If your Agency or Department has not reached out to Vermont Emergency Management to assess your FEMA-eligible costs, please do so now before leveraging SFR.

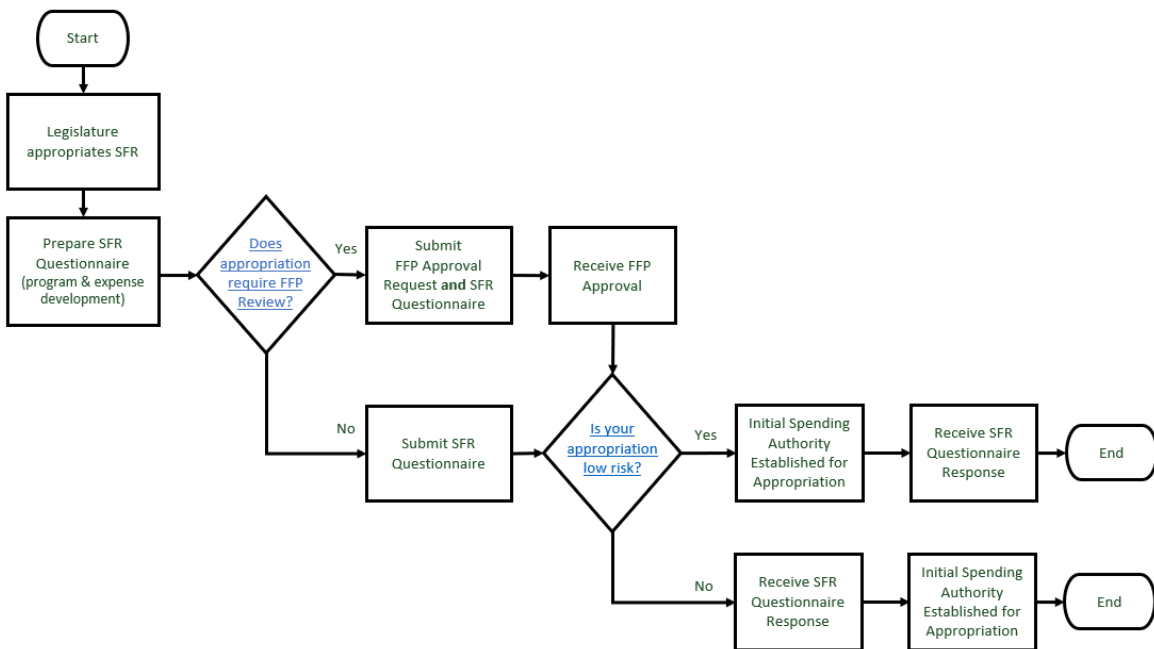
IV. Initial SFR Appropriation Approval and Release Process

The funding release and risk remediation for an SFR appropriation requires that agencies and departments follow the below process. As shown in the process map below, the steps include:

- Obtaining Federally Funded Projects (FFP) Team approval (if necessary),
- Submitting the SFR Questionnaire, and
- Receiving spending authority through the SFR Questionnaire process.

This section will detail the necessary actions in each step, including the differences in processes depending on the appropriation risk. A more concise step-by-step explanation can be found in the [SFR Process Map Outline](#).

Figure 1: Process Flow for Establishing Initial SFR Appropriation Spending Authority



A. SFR Questionnaire—New Programs Approval

In order to obtain spending authority for an appropriation from AOA, agencies and departments which have received an appropriation of SFR funds will complete the [SFR Questionnaire](#). For each SFR appropriation involving a new program (in contrast to an appropriation providing additional SFR funding to an existing program), please identify whether the appropriation will be used to launch a **grant/beneficiary program** and/or to cover **Agency or Department expenses** (including contracts and direct payments).²

² For more guidance on funding administrative expenses, please refer to the [Statewide Promotional Services Vendor Selection Process](#)

Definitions

Grant/beneficiary program: A program that provides funding to non-State entities/individuals for their own demonstrated COVID-19 needs (beneficiary) or to help the State administer part of the SFR program by providing funding to other eligible entities/individuals to address a COVID-19 need (subrecipient).

Agency or department expenses: An agency or department's own operating COVID-19 costs and contracts.

1. The SFR Questionnaire

The [SFR Questionnaire](#) is intended to capture agencies' and departments' planned use of SFR, with sufficient program design and expenditure plan details to inform a CFO review of funding risk and remediation based on Treasury guidelines.

Please follow the instructions outlined in the SFR Questionnaire template for more detailed guidance on the information required for each section of the SFR Questionnaire. For grant/beneficiary programs, please include one program per questionnaire and identify the appropriation(s) for this program in Section 1, Question 4. For Agency or Department expenses, expenses that fall within multiple appropriations can be combined into one questionnaire, with the appropriation Act/Section numbers and/or Excess Receipts Numbers identified in Section 1, Question 5 of the SFR Questionnaire.

The SFR Questionnaire is intended to capture the Agency or Department's use of funds across the identified appropriations. As such, the Use of Funds section of the SFR Questionnaire should be filled out to capture the intended use of funds for any identified programs and expenses included in the SFR Questionnaire.

Please submit your SFR Questionnaire only after you work through the details of your program design and expenditure plans, to ensure that your questionnaire accurately captures your use of funds. This is critical to help ensure that the CFO review and risk remediation is tailored to your use of funds and program design.

2. Federal Award Classification Checklist and Uniform Guidance

As part of the SFR Questionnaire process, AOA is also including a [Federal Award Classification Checklist](#), which helps determine whether a program involves a contract, grant, or beneficiary relationship. This checklist is optional and is recommended for programs in which the relationship between the State and the entity/individuals receiving funds could be classified as a beneficiary relationship. **Without a Classification Checklist submission and approval of the CFO, AOA policy defaults award classifications to "grant" programs and "subrecipient" relationships, rather than "beneficiary" relationships.**

State Fiscal Recovery Fund Process and Policy Guidance

Please complete the [Federal Award Classification Checklist](#) and send it to ADM.COVID@vermont.gov with your SFR Questionnaire. Programs which fill an important short-term need should request expedited review through AOA.

Recipient Designations

Based on the information provided, local governments, businesses, non-profits, educational institutions, or individuals could fall under any of the three categories: subrecipient, beneficiary, or contractor. The designation of an entity/individual as a subrecipient, contractor, or beneficiary determines if Treasury will subject the entity to the administrative and monitoring requirements of the Single Audit Act.

When filling out the checklist to determine awardee designations, oversight agencies should determine if:

- a) SFR payments will be used to provide economic relief for the entity in question
(beneficiary relationship)
- b) The entity will be hired to provide goods or services according to terms and conditions set by the State **(contractor relationship)**
- c) The entity administers part of the federal program, with authority to make decisions regarding service delivery, operations, or type of assistance provided within the terms of agreement with the State, consistent with guidelines of the federal award **(subrecipient relationship)**

The State will need to adhere to the Single Audit Act and 2 CFR 200, Uniform Guidance, for its subrecipient relationships. In addition to these requirements, the State also needs to track subrecipient awards and entities in the VISION Grant Tracker. For more information on reporting requirements, see Section VIII, *Reporting Requirements*.

3. SFR Questionnaire Submission

After completing the questionnaire (and checklist, if applicable), please send them to ADM.COVID@vermont.gov a minimum of two weeks prior to using SFR appropriations or excess receipts. Programs which fill an important short-term need should request expedited review through AOA.

4. SFR Questionnaire Approval Process

After reviewing an Agency or Department's questionnaire and checklist (if necessary), AOA will provide a SFR Questionnaire Response Memo to all entities regarding grant programs, beneficiary programs, contracts, and/or other administrative expenses detailed in the SFR Questionnaire. Response Memos will outline alignment of the proposed use of SFR funds with Treasury SFR guidance and suggest, where necessary, risk mitigation processes for entities to follow. For appropriations requiring Federally Funded Projects (FFP) Team review, Response Memos will only be issued after FFP approval.

State Fiscal Recovery Fund Process and Policy Guidance

Upon receiving the Response Memo from AOA, Departments or Agencies must sign and acknowledge that they will conduct the program as described (including any risk mitigations required) and complete a set of attestations.

B. Initial FFP Team Approval to Establish Spending Authority

(Applies to a subset of appropriations – see *Appendix 1 - FFP Review by Appropriation* to determine if your appropriation requires FFP approval).

To facilitate coordination between Projects, especially infrastructure Projects, and ensure agencies and departments maximize the unique opportunity presented by the SFR, some appropriations require that their component projects receive a recommendation for funding from the FFP Team³ to the Governor. *Appendix 1* includes the full list of appropriations requiring FFP and Gubernatorial approval. This step aims to align SFR programs and projects with both the strategic goals of making Vermont more affordable, growing the economy, protecting the vulnerable, modernizing state government, and ensuring we are maximizing the value of every federal dollar for lasting transformative change. Having interagency collaboration and coordination, especially on the critical, wide-reaching infrastructure, climate, and economic development SFR programs is critical to receiving FFP and Gubernatorial approval.

If an appropriation is on the list as requiring FFP review, Agencies and Departments must identify one or more projects that will be funded by that appropriation. These initial projects may be administrative or foundational in nature (i.e. hiring staff). Agencies must then complete an [FFP Approval Request](#), which collects data on the specific proposed project(s), and submit it to your Governor's Office liaison and cc Douglas.Farnham@vermont.gov and Kendal.smith@vermont.gov. For some projects, presentations to the FFP on the project's demographics, economic and environmental impact, or other project considerations may be required.

C. Initial Appropriation Spending Authority and FFP-Approved Amount

Funding release and spending authority timelines vary depending on the risk level of the appropriation and whether it requires FFP review. Agencies and Departments can confirm which appropriations require FFP review and the associated initial risk designation from *Appendix 1*.

1. For low-risk appropriations that require FFP review

AOA will release funding to the Agency or Department when at least one of the appropriation's projects receives FFP approval and the SFR Questionnaire is **submitted**. However, the Agency or Department is only authorized to spend the funding amount approved by the FFP Team for the associated projects reviewed and approved by the FFP Team.

³ Federally Funded Projects Team: This group is comprised of leadership from agencies/departments that received the lion share of physical infrastructure funds – ACCD, ANR, AHS-DCF, PSD, AOT, DPS-VEM, AOA, and VAAF. AOE also participates if there is intersecting school infrastructure projects. ADS via VCGI is supporting the work with mapping projects & grant applications as a way to share information. The Governor's core principles for infrastructure projects are things that are tangible, transformative, timely and transparent. Funds/projects shall be prioritized to communities with the greatest population, workforce, and student declines over the past 20 years.

2. For low-risk appropriations that do not require FFP review
AOA will release funding to the Agency or Department once a complete SFR Questionnaire is submitted for the appropriation. The Agency or Department is authorized to spend the entire amount of the appropriation.

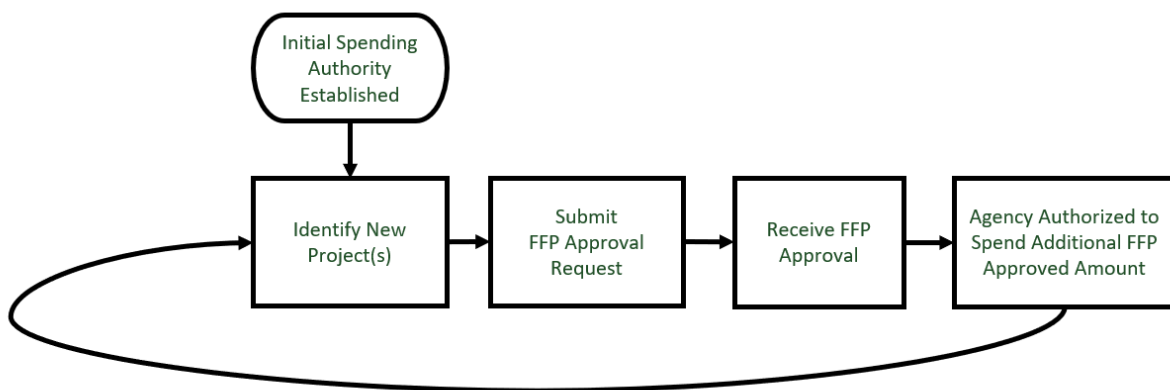
3. For moderate- and high-risk appropriations that require FFP review
AOA requires that a SFR Questionnaire is submitted and a SFR Questionnaire Response Memo is issued by the CFO and accepted by the Agency or Department. Spending authority can only be established for the appropriation once the Agency or Department (1) receives FFP approval and (2) accepts the SFR Questionnaire Response Memo issued by the CFO. While spending authority is established at the appropriation level, the Agency or Department is only authorized to spend the funding amount approved by the FFP Team for the associated projects reviewed and approved by the FFP Team.

4. For moderate- and high-risk appropriations that do not require FFP review
AOA requires that a SFR Questionnaire is submitted and a SFR Questionnaire Response Memo is issued by the CFO and accepted by the Agency or Department. Spending authority can only be established for the appropriation once the Agency or Department accepts the SFR Questionnaire Response issued by the CFO. Spending is authorized for the entire appropriation amount.

V. Spending Authority for Additional Projects Under a Released Appropriation

Agencies and Departments with multiple projects under one appropriation will need to propose each new project (or set of projects) to the FFP Team to receive FFP approval to spend additional funding associated with the FFP-approved projects under the established appropriation.

Figure 2: Process Flow for Spending Authorization for Additional Projects Under an Appropriation/Program with Released Spending Authority



VI. Launching Grant Projects, Beneficiary Projects, and Contracts

After an Agency or Department receives and accepts AOA's SFR Questionnaire Response Memo and FFP project approval, where applicable, it should include the following additional information and requirements when launching a grant program, beneficiary program, or contracting process. Please note that the guidance depends on the type of program or expense as outlined below. This section does not apply to Agency or Department administrative expenses without grant projects, beneficiary projects, or contracts.

A. Launching Grant Projects

Agencies and departments launching grant projects must comply with [Bulletin 5](#) and the [October 1, 2021 addendum](#) on solicitation requirements.⁴

1. Award Letter

The granting entity must provide an Award Letter or Award Notification to the grant recipient. This letter/notification must include appropriate information on the subrecipient, the award amount or in-kind award, and the responsibilities of the subrecipient, as shown in the State of Vermont Grant Agreement Template ([Part I](#), [Part 2](#)). In addition, granting entities must review the [1099-G Reporting Requirements](#) prior to initiating any grant payment in VISION to determine whether the grant payment must be reported on a 1099-G as a taxable grant and the required process.

2. Exhaustion of Funds

For grants designed on a first come/first served basis, when available funds are exhausted, the granting entity must notify the Commissioner of Finance and Management and the Deputy Secretary of Administration immediately, identifying any remaining unmet need.

3. Grant Tracker

Unless the CFO has approved an entity as a SFR "beneficiary" according to the Classification Checklist, all Departments, Agencies, and SFR funding recipients must use the VISION Grant Tracker for their grant program. Entry into the Grant Tracker module is critical to the State's compliance with the Federal requirement to track and review Single Audits for all subrecipients triggering the Single Audit threshold in a given fiscal year.

4. Assurances

Agencies and Departments are required to include a signed copy of the State of Vermont SFR Assurances in their SFR grant program applications and/or awards. Unless otherwise specified, all SFR assurances included in the [SFR Fund Program Assurances](#) document apply to grant applications and/or awards. Agencies and Departments can add to these assurances, but please do not alter or remove any of the listed assurances without prior approval from the COVID-19 Financial Office (ADM.COVID@vermont.gov).

⁴ More information on Bulletin 5 can be found on AOA's [Grant Guidelines and Procedures](#)

B. Launching Beneficiary Projects

1. Award Letter

Agencies or Departments must provide an Award Letter or Award Notification to each beneficiary in the program. This letter/notification must include appropriate information on the beneficiary, the award amount or in-kind award, and the responsibilities of the beneficiary, as shown in the [Beneficiary Notice of Payment template](#).

2. Assurances

Agencies and Departments are required to include a signed copy of the State of Vermont SFR Assurances in their SFR program applications and/or awards. Unless otherwise specified, all SFR assurances included in the [SFR Fund Program Assurances](#) document apply to all applications and/or awards. Agencies and Departments can add to these assurances, but please do not alter or remove any of the listed assurances without prior approval from the COVID-19 Financial Office (ADM.COVID@vermont.gov).

C. Launching Contracts

Agencies and Departments launching contracts to perform State-commissioned work with SFR funds must be in compliance with all requirements of [Bulletin 3.5](#), including the [October 1, 2021 addendum](#) on solicitation requirements, and Uniform Guidance. [The US Treasury does not apply Davis-Bacon Act rules to the State's SFR funds, but does apply an alternative set of requirements, outlined in Appendix 4, for infrastructure projects over \\$10 million.](#)

VII. Reporting Requirements

A. Equity Impact Assessment

All SFR-funded appropriations/programs are new programs and require an Equity Impact Assessment. This must be submitted to the CFO by the end of the fiscal year in which the program is established.

B. Expenditure Category

When your appropriation was approved by the CFO, the AOA Response Memo included an Expenditure Category (EC) that applies to your appropriation/program.⁵ This EC is essential for understanding your SFR reporting requirements. ECs are associated with specific Output Measures, key performance indicators and other required information associated with the type of expenditure. As you detail your appropriation into individual projects, you may coordinate with the CFO to assign EC at the project level. See below for more details.

⁵ See *Appendix 2* for a list of Expenditure Categories.

C. Required Treasury Reports

Below is an overview of reporting requirements for the SFR funds. Additional reporting guidance, including templates, will be provided separately.

Treasury has outlined the State's reporting requirements in the [Coronavirus State and Local Fiscal Recovery Funds Guidance on Recipient Compliance and Reporting Responsibilities](#) document. In addition, Treasury has provided a [User Guide for the Annual Recovery Plan Performance Report](#) and a designated Reporting Portal.

The required reporting for SFR funding includes: **the Recovery Plan Performance Report (annually on July 31), the Interim Report (one time, September 20, 2021), and the Project and Expenditure Report (quarterly through the end of the SFR fund administration).** These reports will be prepared and submitted by the Agency of Administration, but Agencies and Departments need to track and submit the necessary program and/or project level information according to Treasury guidelines.

1. Quarterly Expenditure Reports

The Project and Expenditure Report (quarterly). The first Project and Expenditure Report will cover spending from the date the recipient receives funds to September 30, 2021 and is due October 31, 2021. Subsequent Reports are due 30 days after the end of each quarter.⁶ The CFO will provide a template to assist Agencies and Departments with their reporting requirements.

Contract, Grant, Loan, Transfer and Direct Payment Information

Per Treasury Guidance, in the Project and Expenditure Reports, Agencies and Departments will be asked to provide the following information, broken out by Project. For each obligation and expenditure greater than or equal to \$50,000:

- Subrecipient/beneficiary identifying and demographic information (e.g., DUNS number and location)
- Award number (e.g., Award number, Contract number, Loan number)
- Award date, type, amount, and description
- Award payment method (reimbursable or lump sum payment(s))
- For loans, expiration date (date when loan expected to be paid in full)
- Primary place of performance
- Related Project name(s)
- Related Project identification number(s)
- Period of performance start date
- Period of performance end date
- Quarterly obligation amount
- Cumulative obligation amount
- Quarterly expenditure amount
- Cumulative expenditure amount
- Project Status (Not Started, Completed < 50%, Completed >50%, Complete)
- Associated Program
- Additional programmatic performance indicators for select Expenditure Categories (see below)

⁶ Ibid.

State Fiscal Recovery Fund Process and Policy Guidance

Aggregate reporting is required for contracts, grants, transfers made to other government entities, loans, direct payments, and payments to individuals that are below \$50,000.

Required Project Level Quarterly Data

Per Treasury guidance, Projects in certain ECs require quarterly data. The information provided in *Appendix 3* must be reported in each quarterly report for all Projects in the following ECs:

1. Payroll for Public Health and Safety Employees (EC 1.9)
2. Household Assistance (EC 2.1-2.5)
3. Small Business Economic Assistance (EC 2.9)
4. Aid to Travel, Tourism, and Hospitality or Other Impacted Industries (EC 2.11-2.12)
5. Rehiring Public Sector Staff (EC 2.14)
6. Education Assistance (EC 3.1-3.5)
7. Premium Pay (both Public Sector EC 4.1 and Private Sector EC 4.2)
8. All infrastructure projects (EC 5) required data
 - i. Water and sewer projects data (EC 5.1-5.15)
 - ii. Broadband projects data (EC 5.16-5.17)

2. [The Recovery Plan Performance Report \(annual\)](#)

The Recovery Plan Performance Report is due to the Treasury annually by July 31st.⁷ This Report includes key performance indicators (KPIs) for Program and Project success measurements. For each Program they administer, Agencies must track the Treasury-required KPIs. In addition to Treasury-required KPIs, Agencies and Departments must track and report on metrics required by the Legislature or FFP team. Agencies and Departments should also identify appropriate performance measurements to determine Program success and track progress.

Key Performance Indicators

For projects designated under the specified Expenditure Categories, Agencies and Departments will report the following Key Performance Indicators:

- i. [Household Assistance \(EC 2.2 & 2.5\) and Housing Support \(EC 3.10-3.12\)](#):
 - Number of people or households receiving eviction prevention services (including legal representation)
 - Number of affordable housing units preserved or developed
- ii. [Negative Economic Impacts \(EC 2\)](#):
 - Number of workers enrolled in sectoral job training programs
 - Number of workers completing sectoral job training programs
 - Number of people participating in summer youth employment programs
- iii. [Education Assistance \(EC 3.1-3.5\)](#):
 - Number of students participating in evidence-based tutoring programs

⁷ [Coronavirus State and Local Fiscal Recovery Funds Guidance on Recipient Compliance and Reporting Responsibilities](#)

iv. Healthy Childhood Environments (EC 3.6-3.9):

- Number of children served by childcare and early learning (pre-school/pre-K/ages 3- 5)
- Number of families served by home visiting

Project Demographic Distribution

Projects designated under the following Expenditure Categories must specifically identify whether the Project is serving an economically disadvantaged community.

- Public Health: EC 1.1 & EC 1.2
- Negative Economic Impacts: EC 2.1-2.5, EC 2.7, EC 2.9, EC 2.13
- Services to Disproportionately Impacted Communities: All EC 3 categories

A Project is considered serving an economic disadvantaged community if:

- The Project is provided at a physical location in a Qualified Census Tract (for multi-site projects, if a majority of sites are within Qualified Census Tracts);
- The Project's primary intended beneficiaries live within a Qualified Census Tract;
- The Project's eligibility criteria are such that the primary intended beneficiaries earn less than 60 percent of the median income for the relevant jurisdiction (e.g., State, county, metropolitan area, or other jurisdiction); or
- The Project's eligibility criteria are such that over 25 percent of intended beneficiaries are below the federal poverty line.

Evidence-Based Project Evaluation

The report requires the identification of Projects that are being used for evidence-based interventions and Projects that are being evaluated through rigorous program evaluations designed to build evidence. For Projects designed based on rigorously tested projects (including those in other states), or where Departments and Agencies intend to rigorously test the outcomes of the Project to build evidence, Agencies/Departments must briefly describe the goals of the project, and the evidence base for the interventions funded by the project.

Projects designated under the following Expenditure Categories must specifically identify the dollar amount of the total Project spending that is allocated towards evidence-based interventions:

- Public Health: EC 1.4, 1.10 & 1.11
- Negative Economic Impacts: EC 2.1-2.7,2.9, 2.10 & 2.13
- Services to Disproportionately Impacted Communities: EC 3.1, 3.3-3.14, 3.16

Additional information on Evidence Based Project Evaluation will be provided following further Treasury guidance.

VIII. Records Maintenance

These record retention requirements are applicable to all prime recipients and their grantees and subgrant recipients, contractors, and other levels of government or non-profit entities that received transfers of SFR payments from prime recipients. These recipients of SFR Funds must maintain the following materials for 5 (five) years after all funds have been expended or returned to Treasury, whichever is later:

1. General ledger and subsidiary ledgers used to account for (a) the receipt of SFR payments and (b) the disbursements from such payments to meet eligible expenses related to the public health emergency due to COVID-19.
2. Budget records;
3. Payroll, time records, human resource records to support costs incurred for payroll expenses related to addressing the public health emergency due to COVID-19;
4. Receipts of purchases made related to addressing the public health emergency due to COVID-19;
5. Contracts and subcontracts entered into using SFR payments and all documents related to such contracts;
6. Grant agreements and grant subaward agreements entered into using SFR payments and all documents related to such award;
7. All documentation of reports, audits, and other monitoring of contractors, including subcontractors, and grant recipient and subrecipients;
8. All documentation supporting the performance outcomes of contracts, subcontracts, grant awards, and grant recipient subawards;
9. All internal and external email/electronic communications related to use of SFR payments;
10. All investigative files and inquiry reports involving State Fiscal Recovery Fund payments.

IX. Appendices and Links

Appendices

1. FFP Review by Appropriation List
 - a. Appropriations That Require FFP Review
 - b. Appropriations That Do Not Require FFP Review
2. Expenditure Categories
3. Required Programmatic Data for the Project and Expenditure Report
4. Requirements for SFR Infrastructure Projects over \$10 million

Links

1. [FEMA Prioritization Memo](#)
2. [SFR Process Map Outline](#)
3. [SFR Questionnaire](#)
4. [Statewide Promotional Services Vendor Selection Process](#)
5. [Federal Award Classification Checklist](#)
6. [FFP Approval Request Template](#)
7. [Bulletin 5](#)
8. [October 1, 2021 Addendum to Bulletin 5 and Bulletin 3.5 on Solicitation Requirements](#)
9. Grant Agreement Template ([Part 1](#), [Part 2](#))
10. [1099-G Reporting Requirements](#)
11. [SFR Fund Program Assurances](#)
12. AOA's [Grant Guidelines and Procedures](#)
13. [Beneficiary Notice of Payment](#)
14. [Bulletin 3.5](#)
15. [Coronavirus State and Local Fiscal Recovery Funds Guidance on Recipient Compliance and Reporting Responsibilities](#)
16. Reporting [User Guide](#)
17. [Applicability of Federal Requirements to Vermont State Fiscal Recovery Fund Projects](#)
18. Additional guidance and templates related to the SFR will be routinely added [here](#)

Appendix 1 - FFP Review by Appropriation

1. Appropriations That Require FFP Review

#	Agency/Entity	Appropriation Purpose	Act Number	Section Number	Amount	Initial Risk
1	Agency of Human Services - Department for Children & Families, Office of Economic Opportunity	DCF-OEO - Grants to Community Action agencies as part of EMBRACE - Micro Business Recovery	Act 74	G.300(a)(14)	\$2,000,000	Low
2	Agency of Commerce & Community Development	ACCD - Economic Recovery grants	Act 74	G.300(a)(13)	\$20,000,000	Low
3	Agency of Commerce and Community Development	ACCD - To provide Economic Recovery Bridge Program grants to eligible businesses	Act 9	3(b)(1)	\$10,000,000	Low
4	Agency of Human Services - Department for Children & Families, Office of Economic Opportunity	DCF-OEO - VT Microbusiness Development Funding	Act 9	3a	\$500,000	Low
5	Agency of Human Services - Department of Mental Health	DMH - Expand capacity and make mental health services housing/facilities more accessible, safe & compliant with ADA	Act 9	7	\$4,000,000	Low
6	Agency of Natural Resources - Department of Environmental Conservation	DEC - Funding for 3-acre stormwater permitting design and for flow restoration and construction support for entities	Act 74	G.700(a)(1)(A)	\$5,500,000	Low

State Fiscal Recovery Fund Process and Policy Guidance

7	Agency of Natural Resources - Department of Environmental Conservation	DEC - Funding for wastewater projects in underserved centers	Act 74	G.700(a)(2)(A)	\$8,000,000	Low
8	Agency of Natural Resources - Department of Environmental Conservation	DEC - Funding for financial assistance for pretreatment of toxic waste	Act 74	G.700(a)(2)(B)	\$2,000,000	Low
9	Agency of Natural Resources - Department of Environmental Conservation	DEC - Funding for municipal reduction or elimination of wet weather sewer overflows	Act 74	G.700(a)(3)	\$10,000,000	Low
10	Agency of Natural Resources - Department of Environmental Conservation	DEC - Funding as per Clean Water Board funding appropriation	Act 74	G.700(a)(6)(A)	\$20,000,000	Low
11	Agency of Natural Resources - Department of Forests, Parks & Recreation	FPR - Funding to support compliance with 3-acre stormwater rule	Act 74	G.700(a)(1)(B)	\$1,000,000	Low
12	Agency of Transportation	AOT - Funding for implementing 3-acre and flow restoration	Act 74	G.700(a)(1)(C)	\$3,500,000	Low
13	Department of Public Service	PSD - Funding for broadband projects	Act 74	G.500(a)	\$150,000,000	Low
14	Vermont Housing & Conservation Board	VHCB - Funding to increase shelter capacity and create housing for the housing-insecure	Act 74	G.400(a)(1)	\$64,000,000	Low
15	Agency of Administration	AOA - Grant for the VT Housing Finance Agency for housing weatherization support statewide	Act 74	G.600(a)(2)	\$9,000,000	Moderate

State Fiscal Recovery Fund Process and Policy Guidance

16	Agency of Commerce & Community Development	ACCD - Funding for the Vermont Housing Incentive Program (VHIP)	Act 74	G.400(a)(2)	\$5,000,000	Moderate
17	Agency of Commerce & Community Development - Department of Housing & Community Development	HCD - Funding for financial assistance for water system efficiency improvements for housing rehabilitation projects	Act 74	G.700(a)(4)(A)	\$750,000	Moderate
18	Agency of Human Services - Department for Children & Families, Office of Economic Opportunity	DCF-OEO - Funding for the Home Weatherization Assistance Program with up to \$150,000 for vermiculite remediation and home repair.	Act 74	G.600(a)(1)	\$4,000,000	Moderate
19	Agency of Natural Resources - Department of Environmental Conservation	DEC - Funding for loan forgiveness and financial assistance for residential and mobile home park water systems.	Act 74	G.700(a)(4)(B)	\$4,250,000	Moderate
20	Agency of Natural Resources - Department of Environmental Conservation	DEC - Funding for drinking water, sewer, and stormwater infrastructure projects, including dam safety improvements and CSO abatement	Act 74	G.700(a)(6)(B)	\$30,000,000	Moderate
21	Department of Public Service	PSD - Broadband infrastructure program	Act 9	21(b)	\$1,800,000	Moderate
22	Department of Public Service	PSD - Grants for Efficiency Vermont for weatherization services	Act 74	G.600(a)(3)	\$5,000,000	Moderate

State Fiscal Recovery Fund Process and Policy Guidance

23	Department of Public Service	PSD - Grants for Efficiency Vermont for workforce development initiatives and to support the expansion of NeighborWorks of Western Vermont's Heat Squad program.	Act 74	G.600(a)(4)	\$2,000,000	Moderate
24	Department of Public Service	PSD - Funding for Affordable Community-Scale Renewable Energy Program (\$10,000,000); Funding to be allocated by the Clean Energy Development Board (\$5,000,000); Funding to be approved by General Assembly in 2022 (\$5,000,000).	Act 74	G.600(a)(5)	\$20,000,000	Moderate
25	Agency of Commerce & Community Development - Department of Economic Development	DED - Funding for priority capital projects to attract and retain businesses	Act 74	G.300(a)(12)	\$10,580,000	High
26	Agency of Natural Resources - Department of Environmental Conservation	DEC - Funding for technical assistance for statewide hazard mitigation program	Act 74	G.700(a)(7)(B)	\$120,000	High
27	Department of Public Safety - Division of Emergency Management	DPS - Funding to establish a statewide flood hazard mitigation program with hazard mitigation matching funds and a State-level parcel buyout program	Act 74	G.700(a)(7)(A)	\$4,880,000	High

State Fiscal Recovery Fund Process and Policy Guidance

2. Appropriations That Do Not Require FFP Review

#	Agency/Entity	Appropriation Purpose	Act Number	Section Number	Amount	Initial Risk
1	Agency of Administration	AOA - Funding for administration costs for ARPA funds	Act 74	G.801(a)	\$6,500,000	Low
2	Agency of Education	AOE - School Indoor Air Quality Grant Program	Act 9	15	\$15,000,000	Low
3	Agency of Human Services - Department of Disabilities, Aging & Independent Living	DAIL - Grants for adult day service providers for operating costs and COVID-19 costs	Act 74	G.300(a)(1)	\$5,000,000	Low
4	Agency of Human Services - Department of Mental Health	DMH - Funding for a pilot mobile crisis intervention program in Rutland	Act 74	G.300(a)(2)	\$600,000	Low
5	Agency of Natural Resources - Department of Environmental Conservation	DEC - Funding as per Clean Water Board funding appropriation	Act 74	G.700(a)(5)	\$10,000,000	Low
6	University of Vermont	UVM - Funding to offset the impact from level room and board fees	Act 74	G.300(a)(10)	\$2,200,000	Low
7	University of Vermont	UVM - Matching funds for research grant opportunities for COVID19	Act 74	G.300(a)(7)	\$1,000,000	Low
8	Vermont State Colleges	VSC - Practical Nurse Program: Administrative and start-up costs; incentive payments to students; tuition and fees	Act 9	17(a)	\$1,400,000	Low

State Fiscal Recovery Fund Process and Policy Guidance

9	Vermont State Colleges	VSC - Workforce Upskill jobs training program for Vermonters whose employability or employer has been impacted by the Coronavirus	Act 9	18(a)	\$3,000,000	Low
10	Vermont State Colleges	VSC - Funding for six credits/two courses for whose employment was impacted by COVID-19 since March 13, 2020	Act 74	G.300(a)(8)(A)	\$2,000,000	Low
11	Vermont State Colleges	VSC - Funding for degree completion scholarships for 30 credits for adult learners with a 2+ year gap in attendance and 40 credits earned	Act 74	G.300(a)(8)(B)	\$3,000,000	Low
12	Vermont State Colleges	VSC - Funding for deficits from revenue loss and increased operating expenses	Act 74	G.300(a)(9)	\$21,000,000	Low
13	Agency of Commerce & Community Development	ACCD - Funding for Salesforce grant management system upgrade	Act 74	G.501(a)(6)	\$1,000,000	Moderate
14	Agency of Digital Services	ADS - Funding for cybersecurity core infrastructure and router replacements	Act 74	G.501(a)(5)	\$1,500,000	Moderate
15	Agency of Education	AOE - Funding for license management and other data systems	Act 74	G.501(a)(11)	\$4,010,000	Moderate
16	Department of Labor	DOL - Funding to complete UI modernization and Joblink replacement	Act 74	G.501(a)(10)	\$4,500,000	Moderate

State Fiscal Recovery Fund Process and Policy Guidance

17	Department of State's Attorneys and Sheriffs	SAS - Funding for case management system software upgrade	Act 74	G.501(a)(7)	\$1,700,000	Moderate
18	Natural Resources Board	NRB - Funding for Act 250 scanning project	Act 74	G.501(a)(3)	\$500,000	Moderate
19	Office of the Defender General	DG - Funding to complete case management system upgrade	Act 74	G.501(a)(8)	\$140,000	Moderate
20	Secretary of State	SOS - Funding to complete Vermont Business portal	Act 74	G.501(a)(9)	\$250,000	Moderate
21	Vermont State Colleges	VSC - Funding for free last dollar tuition for 1yr of credit in critical occupation careers	Act 74	G.300(a)(8)(C)	\$5,000,000	Moderate
22	Agency of Natural Resources - Department of Environmental Conservation	DEC - Funding to complete Phase 2 of permit navigator portal	Act 74	G.501(a)(2)	\$1,100,000	High
23	Agency of Transportation - Department of Motor Vehicles	DMV - Funding to complete Phase 1 of DMV IT system replacement	Act 74	G.501(a)(1)	\$14,120,000	High
24	University of Vermont	UVM - Workforce Upskill jobs training program	Act 9	18(b)	\$1,000,000	High
25	Vermont Student Assistance Corporation	VSAC - HS Grad Advancement opportunity (up to two free classes)	Act 9	19	\$2,800,000	High

Appendix 2 - Expenditure Categories

The Expenditure Categories (EC) listed below will be provided to Agencies and Departments in their AOA Response Memo. The term “Expenditure Category” refers to the detailed level (e.g., 1.1 COVID-10 Vaccination). When referred to as a category (e.g., EC 1) it includes all Expenditure Categories within that level.

*Denotes areas where recipients must identify the amount of the total funds that are allocated to evidence-based interventions (see “6. Use of Evidence” under “C. The Recovery Plan Performance Report” section of the Compliance and Reporting Guidance for details)

^Denotes areas where recipients must report on whether projects are primarily serving disadvantaged communities (see “d. Project Demographic Distribution” under “3. Required information” of the “B. Project and Expenditure Report” section of the Compliance and Reporting Guidance for details)

1. Public Health⁸

1.1 COVID-19 Vaccination ^

1.2 COVID-19 Testing ^

1.3 COVID-19 Contact Tracing

1.4 Prevention in Congregate Settings (Nursing Homes, Prisons/Jails, Dense Work Sites, Schools, etc.)*

1.5 Personal Protective Equipment

1.6 Medical Expenses (including Alternative Care Facilities)

1.7 Capital Investments or Physical Plant Changes to Public Facilities that respond to the COVID-19 public health emergency

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

1.9 Payroll Costs for Public Health, Safety, and Other Public Sector Staff Responding to COVID-19

1.10 Mental Health Services*

1.11 Substance Use Services*

1.12 Other Public Health Services

2. Negative Economic Impacts

2.1 Household Assistance: Food Programs* ^

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

2.3 Household Assistance: Cash Transfers* ^

2.4 Household Assistance: Internet Access Programs* ^

2.5 Household Assistance: Eviction Prevention* ^

2.6 Unemployment Benefits or Cash Assistance to Unemployed Workers*

2.7 Job Training Assistance (e.g., Sectoral job-training, Subsidized Employment, Employment Supports or Incentives)* ^

2.8 Contributions to UI Trust Funds

2.9 Small Business Economic Assistance (General)* ^

⁸ Appendix 1 of [Coronavirus State and Local Fiscal Recovery Funds Guidance on Recipient Compliance and Reporting Responsibilities](#)

State Fiscal Recovery Fund Process and Policy Guidance

- 2.10 Aid to Nonprofit Organizations*
- 2.11 Aid to Tourism, Travel, or Hospitality
- 2.12 Aid to Other Impacted Industries
- 2.13 Other Economic Support* ^
- 2.14 Rehiring Public Sector Staff

3. Services to Disproportionately Impacted Communities

- 3.1 Education Assistance: Early Learning* ^
- 3.2 Education Assistance: Aid to High-Poverty Districts ^
- 3.3 Education Assistance: Academic Services* ^
- 3.4 Education Assistance: Social, Emotional, and Mental Health Services* ^
- 3.5 Education Assistance: Other* ^
- 3.6 Healthy Childhood Environments: Child Care* ^
- 3.7 Healthy Childhood Environments: Home Visiting* ^
- 3.8 Healthy Childhood Environments: Services to Foster Youth or Families Involved in Child Welfare System* ^
- 3.9 Healthy Childhood Environments: Other* ^
- 3.10 Housing Support: Affordable Housing* ^
- 3.11 Housing Support: Services for Unhoused Persons* ^
- 3.12 Housing Support: Other Housing Assistance* ^
- 3.13 Social Determinants of Health: Other* ^
- 3.14 Social Determinants of Health: Community Health Workers or Benefits Navigators* ^
- 3.15 Social Determinants of Health: Lead Remediation ^
- 3.16 Social Determinants of Health: Community Violence Interventions* ^

4. Premium Pay

- 4.1 Public Sector Employees
- 4.2 Private Sector: Grants to Other Employers

5. Infrastructure⁹

- 5.1 Clean Water: Centralized Wastewater Treatment
- 5.2 Clean Water: Centralized Wastewater Collection and Conveyance
- 5.3 Clean Water: Decentralized Wastewater
- 5.4 Clean Water: Combined Sewer Overflows
- 5.5 Clean Water: Other Sewer Infrastructure
- 5.6 Clean Water: Stormwater
- 5.7 Clean Water: Energy Conservation
- 5.8 Clean Water: Water Conservation
- 5.9 Clean Water: Nonpoint Source
- 5.10 Drinking water: Treatment
- 5.11 Drinking water: Transmission & Distribution
- 5.12 Drinking water: Transmission & Distribution: Lead Remediation

⁹ Definitions for water and sewer Expenditure Categories can be found in the EPA's handbooks.

For "clean water" expenditure category definitions, please see:

<https://www.epa.gov/sites/production/files/2018-03/documents/cwdefinitions.pdf>

For "drinking water" expenditure category definitions, please see: <https://www.epa.gov/dwsrf/drinking-water-staterevolving-fund-national-information-management-system-reports>

State Fiscal Recovery Fund Process and Policy Guidance

5.13 Drinking water: Source

5.14 Drinking water: Storage

5.15 Drinking water: Other water infrastructure

5.16 Broadband: “Last Mile” projects

5.17 Broadband: Other projects

6. Revenue Replacement

6.1 Provision of Government Services

7. Administrative

7.1 Administrative Expenses

7.2 Evaluation and Data Analysis

7.3 Transfers to Other Units of Government

7.4 Transfers to Non-entitlement Units (States and territories only)

Appendix 3 - Required Data for the Project and Expenditure Report

Required Programmatic Data for Non-Infrastructure Projects

For all projects listed under the following Expenditure Categories, the information listed must be provided in each report.¹⁰

1. Payroll for Public Health and Safety Employees (EC 1.9):
 - Number of government FTEs responding to COVID-19 supported under this authority
2. Household Assistance (EC 2.1-2.5):
 - Brief description of structure and objectives of assistance program(s) (e.g., nutrition assistance for low-income households)
 - Number of individuals served (by program if recipient establishes multiple separate household assistance programs)
 - Brief description of recipient's approach to ensuring that aid to households responds to a negative economic impact of Covid-19, as described in the Interim Final Rule
3. Small Business Economic Assistance (EC 2.9):
 - Brief description of the structure and objectives of assistance program(s) (e.g., grants for additional costs related to Covid-19 mitigation)
 - Number of small businesses served (by program if recipient establishes multiple separate small businesses assistance programs)
 - Brief description of recipient's approach to ensuring that aid to small businesses responds to a negative economic impact of COVID-19, as described in the Interim Final Rule
4. Aid to Travel, Tourism, and Hospitality or Other Impacted Industries (EC 2.11-2.12):
 - If aid is provided to industries other than travel, tourism, and hospitality (EC 2.12), a description of pandemic impact on the industry and rationale for providing aid to the industry
 - Brief narrative description of how the assistance provided responds to negative economic impacts of the COVID-19 pandemic
 - For each subaward:
 - Sector of employer (Note: additional detail, including list of sectors to be provided in a users' guide)
 - Purpose of funds (e.g., payroll support, safety measure implementation)
5. Rehiring Public Sector Staff (EC 2.14):
 - Number of FTEs rehired by governments under this authority
6. Education Assistance (EC 3.1-3.5):
 - The National Center for Education Statistics ("NCES") School ID or NCES District ID. List the School District if all schools within the school district received some funds. If not all

¹⁰ Section "A. Interim Report" of [Coronavirus State and Local Fiscal Recovery Funds Guidance on Recipient Compliance and Reporting Responsibilities](#)

schools within the school district received funds, list the School ID of the schools that received funds. These can allow evaluators to link data from the NCES to look at school-level demographics and, eventually, student performance.¹¹

7. Premium Pay (both Public Sector EC 4.1 and Private Sector EC 4.2):

- List of sectors designated as critical to the health and well-being of residents by the chief executive of the jurisdiction, if beyond those included in the Interim Final Rule (Note: a list of sectors will be provided in the forthcoming users' guide).
- Number of workers to be served
- Employer sector for all subawards to third-party employers (i.e., employers other than the State, local, or Tribal government) (Note: a list of sectors will be provided in the forthcoming users' guide).
- For groups of workers (e.g., an operating unit, a classification of worker, etc.) or, to the extent applicable, individual workers, for whom premium pay would increase total pay above 150 percent of their residing State's average annual wage, or their residing county's¹² average annual wage, whichever is higher, on an annual basis:
 - A brief written narrative justification of how the premium pay or grant is responsive to workers performing essential work during the public health emergency. This could include a description of the essential workers' duties, health or financial risks faced due to COVID-19, and why the recipient government determined that the premium pay was responsive to workers performing essential work during the pandemic. This description should not include personally identifiable information; when addressing individual workers, recipients should be careful not to include this information. Recipients may consider describing the workers' occupations and duties in a general manner as necessary to protect privacy.

Required Programmatic Data for Infrastructure Projects (EC 5):

Each project will be required to report the following expenditure:

1. All infrastructure projects (EC 5):

- Projected/actual construction start date (month/year)
- Projected/actual initiation of operations date (month/year)
- Location (for broadband, geospatial location data)
- For projects over \$10 million:
 - a. A recipient may provide a certification that, for the relevant project, all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing, as determined by the U.S. Secretary of Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State (or the District of Columbia) in which the work is to be performed, or

¹¹ For more information on NCES identification numbers see <https://nces.ed.gov/ccd/districtsearch/> (districts) and <https://nces.ed.gov/ccd/schoolsearch/> (schools).

¹² County means a county, parish, or other equivalent county division (as defined by the Census Bureau). See 31 CFR 35.3.

by the appropriate State entity pursuant to a corollary State prevailing-wage-in-construction law (commonly known as “baby Davis Bacon Acts”). If such certification is not provided, a recipient must provide a project employment and local impact report detailing:

- The number of employees of contractors and sub-contractors working on the project;
 - The number of employees on the project hired directly and hired through a third party;
 - The wages and benefits of workers on the project by classification; and
 - Whether those wages are at rates less than those prevailing.¹³ Recipients must maintain sufficient records to substantiate this information upon request.
- b. A recipient may provide a certification that a project includes a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158(f)). If the recipient does not provide such certification, the recipient must provide a project workforce continuity plan, detailing:
- How the recipient will ensure the project has ready access to a sufficient supply of appropriately skilled and unskilled labor to ensure high-quality construction throughout the life of the project;
 - How the recipient will minimize risks of labor disputes and disruptions that would jeopardize timeliness and cost-effectiveness of the project; and
 - How the recipient will provide a safe and healthy workplace that avoids delays and costs associated with workplace illnesses, injuries, and fatalities;
 - Whether workers on the project will receive wages and benefits that will secure an appropriately skilled workforce in the context of the local or regional labor market; and
 - Whether the project has completed a project labor agreement.
- c. Whether the project prioritizes local hires.
- d. Whether the project has a Community Benefit Agreement, with a description of any such agreement.

For all projects listed under the Water, Sewer, and Broadband Expenditure Categories, more detailed project-level information is required as follows:

2. Water and sewer projects (EC 5.1-5.15):

- National Pollutant Discharge Elimination System (NPDES) Permit Number (if applicable; for projects aligned with the Clean Water State Revolving Fund)
- Public Water System (PWS) ID number (if applicable; for projects aligned with the Drinking Water State Revolving Fund)

¹³ As determined by the U.S. Secretary of Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the “Davis-Bacon Act”), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State (or the District of Columbia) in which the work is to be performed.

3. Broadband projects (EC 5.16-5.17):

- Speeds/pricing tiers to be offered, including the speed/pricing of its affordability offering
- Technology to be deployed
- Miles of fiber
- Cost per mile
- Cost per passing
- Number of households (broken out by households on Tribal lands and those not on Tribal lands) projected to have increased access to broadband meeting the minimum speed standards in areas that previously lacked access to service of at least 25 Mbps download and 3 Mbps upload o Number of households with access to minimum speed standard of reliable 100 Mbps symmetrical upload and download o Number of households with access to minimum speed standard of reliable 100 Mbps download and 20 Mbps upload
- Number of institutions and businesses (broken out by institutions on Tribal lands and those not on Tribal lands) projected to have increased access to broadband meeting the minimum speed standards in areas that previously lacked access to service of at least 25 Mbps download and 3 Mbps upload, in each of the following categories: business, small business, elementary school, secondary school, higher education institution, library, healthcare facility, and public safety organization
 - Specify the number of each type of institution with access to the minimum speed standard of reliable 100 Mbps symmetrical upload and download; and
 - Specify the number of each type of institution with access to the minimum speed standard of reliable 100 Mbps download and 20 Mbps upload

Appendix 4 – Requirements for SFR Infrastructure Projects (over \$10 million)

For all infrastructure projects over \$10 million, agencies and departments should ensure that the outlined labor requirements below are met for any grants, contracts, and subcontracts that are associated with these projects (U.S. Treasury, Compliance and Reporting Guidance, p. 21).

“Recipient” refers to the State of Vermont – in this case, the State agencies and departments that oversee the relevant SFR infrastructure projects.

“For projects over \$10 million:

a. A recipient may provide a certification that, for the relevant project, all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing, as determined by the U.S. Secretary of Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the “Davis-Bacon Act”), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State (or the District of Columbia) in which the work is to be performed, or by the appropriate State entity pursuant to a corollary State prevailing-wage-in-construction law (commonly known as “baby Davis Bacon Acts”). **If such certification is not provided**, a recipient must provide a project employment and local impact report detailing:

- The number of employees of contractors and sub-contractors working on the project;
- The number of employees on the project hired directly and hired through a third party;
- The wages and benefits of workers on the project by classification; **and**
- Whether those wages are at rates less than those prevailing.¹⁹ Recipients must maintain sufficient records to substantiate this information upon request.

b. A recipient may provide a certification that a project includes a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158(f)). **If the recipient does not provide such certification**, the recipient must provide a project workforce continuity plan, detailing:

- How the recipient will ensure the project has ready access to a sufficient supply of appropriately skilled and unskilled labor to ensure high-quality construction throughout the life of the project;
- How the recipient will minimize risks of labor disputes and disruptions that would jeopardize timeliness and cost-effectiveness of the project; **and**
- How the recipient will provide a safe and healthy workplace that avoids delays and costs associated with workplace illnesses, injuries, and fatalities;
- Whether workers on the project will receive wages and benefits that will secure an appropriately skilled workforce in the context of the local or regional labor market; **and**
- Whether the project has completed a project labor agreement.

c. [Report] whether the project prioritizes local hires.

d. [Report] whether the project has a Community Benefit Agreement, with a description of any such agreement.”