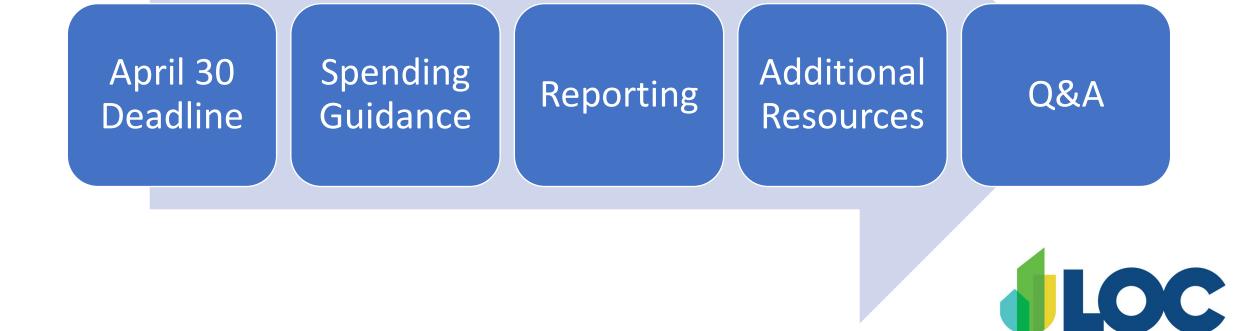
American Rescue Plan Act April 30 Project and Expenditure Report



Mark Gharst LOC Lobbyist for Tax, Finance & Economic Development Webinar for NEUs - April 15, 2022

Agenda



League of Oregon Cities

What part of ARPA will we cover?

Focus today is **April 30** reporting for smaller cities

- Coronavirus State and Local Fiscal Recovery Funds (SLFRF) program
- Specifically, the \$242.9 million ARPA allocation to non-entitlement cities (NEUs)
- April 30 deadline for Project and Expenditure Reports

We will **not** be discussing the following in any detail

- \$437.7 million ARPA allocation to metropolitan cities
- \$240 million in legislator requests administered through DAS
- \$276 million in water and sewer projects through Business Oregon
- \$124 million in transportation projects through ODOT



Annual reporting for NEUs starts April 30

Tier	Recipient	Interim Report	Project and Expenditure Report	Recovery Plan Performance Report
1	States, U.S. territories, metropolitan cities and counties with a population that exceeds 250,000 residents	By August 31, 2021 or 60 days after receiving funding if funding was received by October 15, with expenditures by	By January 31, 2022, and then 30 days after the end of each quarter thereafter <i>Note: NEUs were</i>	By August 31, 2021 or 60 days after receiving funding, and annually thereafter by July 31
2	Metropolitan cities and counties with a population below 250,000 residents that are allocated more than \$10 million in SLFRF funding, and NEUs that are allocated more than \$10 million in SLFRF funding.		not required to submit a Project and Expenditure Report on January 31, 2022. The first reporting date for NEUs will be	
3	Tribal Governments that are allocated more than \$30 million in SLFRF funding			
4	Tribal Governments that are allocated less than \$30 million in SLFRF funding		By April 30, 2022, and then annually thereafter	
5	Metropolitan cities and counties with a population below 250,000 residents that are allocated less than 510 million in SLENE funding, and NEUs that are allocated less than			
	\$10 million in SLFRF Funding			

From Treasury's "P&E Report User Guide" document



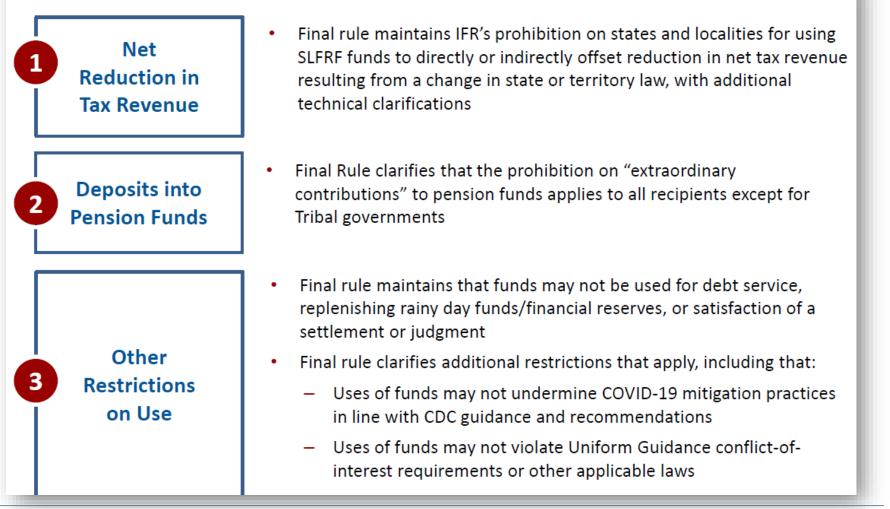
Now operating under the Final Rule

- Released January 6, 2022
- Replaces Interim Final Rule
- Took effect April 1, 2022
- Spending prior to April 1 can qualify under either Interim or Final Rule
- Introduction to the Final Rule – webinar with good description of changes from the interim rule



Final Rule clarifies existing restrictions

The final rule maintains the IFR's restrictions on use with additional clarifications.



Slide from Treasury's "NEU Reporting Overview" webinar



Final Rule maintains allowed uses...

Four Key Eligible Use Categories

ARPA provides four major categories of eligible uses to tackle the broad range of public health and economic challenges caused or exacerbated by the COVID-19 emergency.

loss due to the pandemic

Public Health & Economic Response

Public Sector

Revenues

1

3

4

Responding to COVID-19's public health impact, along with its economic harms

• Providing government services up to the amount of revenue

Premium Pay for Essential Workers • Offering additional support to workers who bear the greatest health risks because of their service in critical sectors

Water, Sewer & Broadband Infrastructure Providing funding to critical water and sewer projects, along with high-speed broadband infrastructure Slide from Treasury's "NEU Reporting Overview" webinar



...but with some enhanced flexibility

KEY NEW FEATURES IN THE FINAL RULE Slide from Major simplification for thousands of recipients through the **Public Sector** \$10 million revenue loss standard allowance 1 **Treasury's** Revenues "NEU Providing a broader set of eligible uses for impacted and <u>Reporting</u> **Public Health &** disproportionately impacted populations Clarifying that reasonably proportional capital expenditures may be **Economic Response** Overview" allowable (e.g., affordable housing, hospitals) webinar **Premium Pay for** Streamlining options to provide premium pay by broadening the share of essential workers who can receive premium pay Essential 3 without a written justification Workers Expanding water and sewer projects that are eligible Water, Sewer & Broadening eligible broadband investments to allow recipients to **Broadband** 4 address access, affordability & reliability challenges Infrastructure LOC

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New \$10 million allowance for revenue loss

Replace Public Sector Revenue Loss

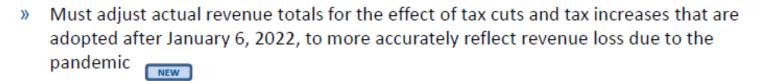
Public Sector
 Revenues

Recipients may use these funds to provide government services, up to the amount of revenue loss experienced due to the COVID-19 public health emergency.



Determine revenue loss, using one of two available options:

- Elect "standard allowance" of up to \$10 million to spend on government services through the life of the program, which greatly simplifies the program for small localities
- Calculate actual revenue loss according to Treasury formula
- » Calculate revenue loss either on a calendar or fiscal year basis



<u>Treasury's</u> <u>"NEU</u> <u>Reporting</u> <u>Overview"</u> <u>webinar</u>

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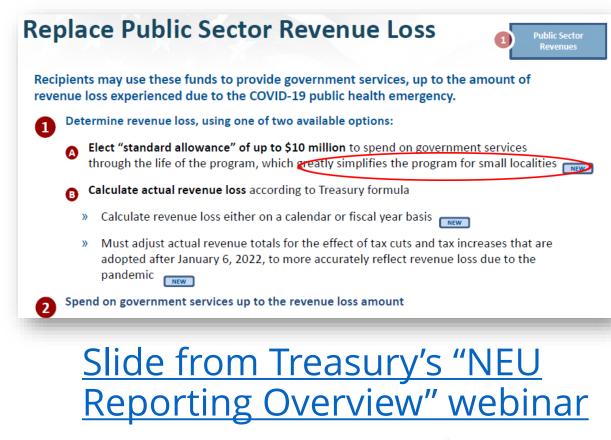
Slide from

2

Spend on government services up to the revenue loss amount

The "standard allowance" election

- April 30 report will require a one-time election on whether to take the allowance, up to the amount of your full award
- This decision cannot be changed in future reporting
- Treasury expects most NEUs will opt for the standard allowance
- Can still report individual projects that could fit in another spending category, but with reduced reporting requirements
- This is your "easy button"





Additional detail on "government services"



U.S. DEPARTMENT OF THE TREASURY

SPENDING ON GOVERNMENT SERVICES

Recipients can use SLFRF funds on government services up to the revenue loss amount, whether that be the standard allowance amount or the amount calculated using the above approach. **Government services generally include** *any service* **traditionally provided by a government**, unless Treasury has stated otherwise. Here are some common examples, although this list is not exhaustive:

- Construction of schools and hospitals
- Road building and maintenance, and other infrastructure
- ✓ Health services
- General government administration, staff, and administrative facilities

- Environmental remediation
- Provision of police, fire, and other public safety services (including purchase of fire trucks and police vehicles)

Government services is the most flexible eligible use category under the SLFRF program, and funds are subject to streamlined reporting and compliance requirements. Recipients should be mindful that certain restrictions, which are detailed further in the Restrictions on Use section and apply to all uses of funds, apply to government services as well.

From Treasury's "Overview of the Final Rule" document (Page 11)



Two Paths to Submitting a P&E Report

As an NEU, there are two ways to available to complete your Project and Expenditure Report.

FAST AND SIMPLE

OPTION 1

Submitting ONLY Project(s) under Expenditure Category 6: Revenue Replacement

Requirements (For April 2022):

- Limited Project level reporting
- No Subrecipient level reporting (for April)
- No Subaward/Expenditure reporting (for April)
- Must still complete Recipient Specific module

STANDARD

OPTION 2

Submitting a Project(s) under other Expenditure Categories

Requirements:

- Detailed Project level reporting
- Subrecipient level reporting may be required
- Subaward/Expenditure reporting may be required
- Must complete Recipient Specific module

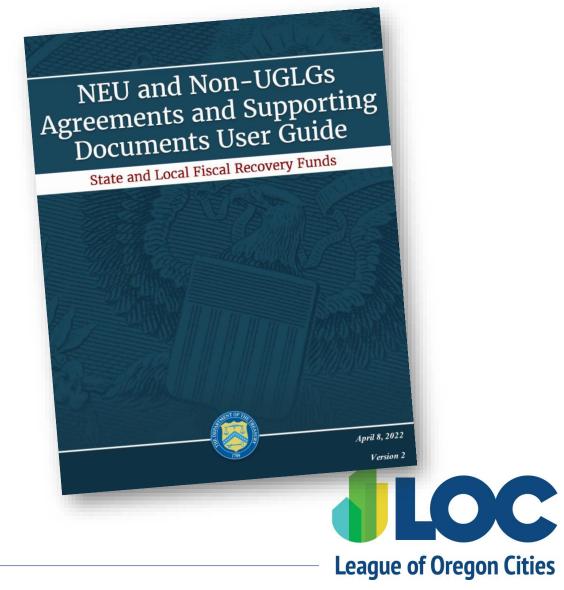
Slide from Treasury's "NEU Reporting Overview" webinar



Have you taken care of the first step?

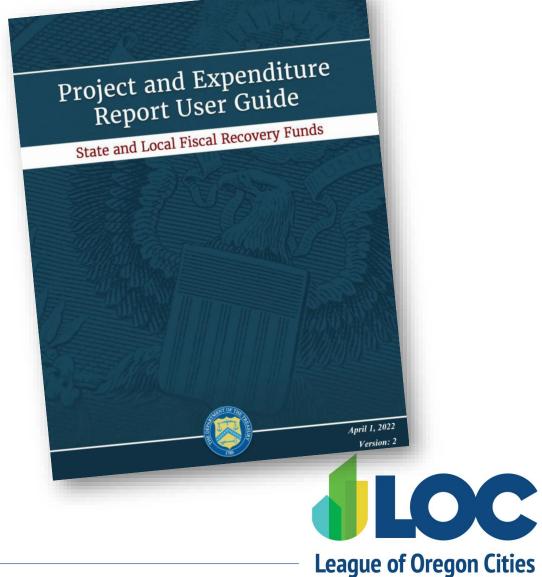
- Logging into the portal, setting up your authorized users, and uploading a few documents is the first step
- <u>Treasury's NEU Supporting</u> <u>Documents User Guide</u> provides instructions on setting accounts, assigning reporting roles, and providing required documentation to Treasury

• <u>Treasury's NEU Intro to</u> <u>Reporting</u> webinar gives step by step instructions on getting you account set up so you can be ready to report



Now you are ready to report

- <u>April 2022 Project and Expenditure</u> <u>Report User Guide</u> provides stepby-step instructions on completing the P&E Report
- <u>Treasury's P&E Report Revenue</u> <u>Replacement Reporting</u> <u>Webinar</u> gives overview of revenue replacement reporting webinar gives step by step instructions (but can be a little confusing)
- Another webinar for reporting under other categories is coming, watch <u>Treasury's YouTube channel</u>



Navigate to the reporting home page

🗮 🛛 👩 Treasury COVID-19 Relief Hub

State, Local and Tribal Support

Compliance

Compliance Reports

Compliance Process

Introduction

You now have a login and 24/7 access to this portal. You have two options while working on your compliance report(s) – save your progress or submit the submission. If you save, you can return and edit information as needed. To resume working on a draft submission, click on "Compliance Reports" using the navigation to the left of the page. This will bring you to your list of compliance reports, click "Provide Information" to continue the process.

Welcome to the Treasury Programs supporting State, Territory, Tribal, and Local Government as part

Depending on if you are a state, territory, local, or Tribal government, you will be eligible for different programs. Information regarding the various funds follows.

State and Local Fiscal Recovery Funds (SLFRF)

\$350 billion available for state, territory, Tribal, and local governments to support the public health response and lay the foundation for a strong and equitable economic recovery.

Emergency Rental Assistance (ERA)

of the 2021 American Rescue Plan.

\$21.6 billion available for state, territory, and local governments to assist households that are unable to pay rent and utilities.

Homeowner Assistance Fund (HAF)

Nearly \$10 billion available for state, territory, and Tribal governments to provide relief for our country's most vulnerable homeowners.

Ready to get started? Click "Go to your reports" below.

Go To Your Reports

<u>From</u> <u>Treasury's</u> <u>P&E Report</u> <u>Revenue</u> <u>Replacement</u> <u>Reporting</u> <u>Webinar</u>



Select the P&E Report option

≡	🔁 Treasury COVID-19 Re	ief Hub						
	My Compliance	Reports						
State, Local and Tribal Support Compliance	SLFRF Complian	nce Reports				Reco	rds per page: 25 • Page: 1 of 1	
	Report Name	Report Type	CFDA No	Report Period	Deadline	Status	Provide Informa Download	
				Quarter 1 2022				

From Treasury's P&E Report Revenue Replacement Reporting Webinar



You will have four tabs to complete for revenue replacement

Select a tab to access the appropriate 'Bulk Data' templates

<u>From</u> <u>Treasury's</u> <u>P&E Report</u> <u>Revenue</u> <u>Replacement</u> <u>Reporting</u> <u>Webinar</u>

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Review and report any errors on Recipient Profile tab

= Treasury COVID-19 Relief Hub

•

Recipient Profile State, Local and Tribal Support **SLFRF** Compliance **Recipient Information** Introduction/Bulk UELO Templates DUNSO **Recipient Profile** TINO Project Overview Legal Entity Name Subrecipients/ Reneficiaries/ Typeo Contractors FAIN Subawards/Direct Payments CFDA No. Expenditures **Recipient Specific** Certification *Who approves the budget in your jurisdiction? N PROPERTY

Please verify that you are an authorized user of the prime recipient and confirm the accuracy of your organization's program profile. Addresso 123 Main Road 098123654 Address 20 Address 30 Test Record Cityo Test NEU State/Territory AK 55555 Zip5o 12345 55555 Zip+40 5555 Reporting Tiero Tier 1. States, U.S. territories, metropolitan cities and counties with a population that exceeds 250,000 residents Please report discrepancies (if any) on the Recipient Information

From Treasury's P&E Report Revenue **Replacement** <u>Reporting</u> Webinar

Report Name

2022 (Test)

Report Type

Report

Report Period

March)

1/1/2022

3/31/2022

Submission Deadline

Allocated Amount \$10,000,000.00

Draft

SLT-9999 P&E Report - Q1

Project and Expenditure

Quarter 1 2022 (January-

Reporting Period Start Date

Reporting Period End Date

4/30/2022 11:45 PM

Report Information



Click "Add New Project" on Project Overview tab

Expenditures	C THE PAR	×		
Recipient Specific	You may need to refresh your browser screen to see your new entries.			Биана
Certification	To submit a report if no projects identified, please answer the conditional question	ons below and proceed to certification.		<u>From</u>
	No Projects Verification *Does your jurisdiction have projects to report as of this reporting period?			<u>Treasury's</u> <u>P&E Report</u>
	My jurisdiction has projects to report	•		Revenue
	Save			Replacement
	My Projects	Complete	= Warning • V = Not Complete •	Reporting
	Total Number of Projects : 0		_	<u>Webinar</u>
	Total Obligations: \$0.00	Total Expenditures: \$0.00		
	o Add New Project			
	You have no projects. Create a project by clicking 'Add new Project'			
	Back		Next	

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Complete the "Add Project" pop up box

Expenditures You may need to refresh your browser screen to see your new entries			
Ad	From		
General Project Information			From Troosury's
* Project Expenditure Category Group			<u>Treasury's</u>
6-Revenue Replacement			P&E Report
* Project Expenditure Category			
6.1-Provision of Government Services	*		<u>Revenue</u>
Please note: at this time, obligations and expenditures reported under Expenditure Category: o separately reported.	.1 Provision of Government Services do not need to ha	ave subrecipients, subawards, or expenditures	Replacement
*Project Name *Recipient Project ID®	Adopted Budget		<u>Reporting</u>
Test Project - 6.1 Revenue Replacement ABC1001			
*Total Cumulative Obligations *Total Cumulative Expenditures	*Current Period Obligations®	*Current Period Expenditures	Webinar
I I			
Program Income Earned Program Income Expended			
*Project Description			
		Add Project	

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Obligations and Expenditures defined

Each recipient is required to report **obligations** and **expenditures** by project according to the corresponding Expenditure Category (EC). As noted in the Reporting Guidance, there are a wide range of eligible uses of the SLFRF funds, and Treasury must be able to track how funds are used by recipients for oversight and transparency purposes. In addition, States, U.S. territories, and metropolitan cities and counties with a population over 250,000 also need to provide the **adopted budget** for each project.

- An obligation is an order placed for property and services, contracts and subawards made, and similar transactions that require payment.
- An expenditure is the amount that has been incurred as a liability of the entity (the service has been rendered or the good has been delivered to the entity).
- The adopted budget is the budget adopted for each project by a recipient associated with SLFRF funds. Recipients will enter the Adopted Budget based on information that exists currently in the recipient's financial systems and the recipient's established budget process. Treasury understands that recipients may use different budget processes. For example, a recipient may consider a project budgeted once a legislature has appropriated funds; whereas another recipient may consider a project budgeted at the moment the funds have been obligated.

<u>From</u> <u>Treasury's</u> <u>"P&E</u> <u>Report</u> <u>User</u> <u>Guide"</u> <u>document</u> (Page 11)



Save the project and check status, add additional projects if applicable

ipients/	Note: Bulk Upload templates will appear once you Saving Project Your changes have	
ciaries/ ctors		narrequired neitids effective for the April 2022 reporting cycle, the project status indicator on y submitted projects until the project expenditure category is confirmed and the additional
ards/Direct		ect's EC by clicking the project status indicator in the My Projects list and selecting the new the bottom right. Recipients are encouraged to review the Expenditure Categories for
itures	previously entered projects to ascertain the Expenditure Category	y properly reflects the use of funds.
ent Specific	You may need to refresh your browser screen to see your new entries	es.
ation		
	My Projects	Complete I = Complete I = Warning I = Not Complete I
	Total Number of Projects : 1	
	Total Number of Projects : 1	
	Total Obligations: \$10,000,000.00	Total Expenditures: \$5,000,000,00
	31000,0000	\$3,000,000,00
	• Add New Project	
	Q. Search	Records per page: 10 Page: 1 of 1
	Project Name v Recipient Project Id v Total Obligati	tions v Total Expenditures v Expenditure Categ v Project Status Subaward Status Expenditure Status
	: Test Project - 6.1 Reve ABC1001 \$10,0	0,000,000.00 \$5,000,000.00 6-Revenue Replacement
		▲ Download as C:
	Back	Next

<u>From</u> <u>Treasury's</u> <u>P&E Report</u> <u>Revenue</u> <u>Replacement</u> <u>Reporting</u> <u>Webinar</u>



"Projects" defined

Key Concept: Projects

Projects:

- Closely related activities toward a common purpose/goal
- New or existing services or investments
- Funded in whole or in part by SLFRF funding
- Align to one Expenditure Category only.
- Recipients have flexibility to define their projects but must provide a sufficient level of detail to be able to report on specific activities for each project, including any required program reporting.
- Additional programmatic data may be required by project, depending on the Expenditure Category selected

Slide from Treasury's "NEU Reporting Overview" webinar



Navigate to Recipient Specific tab and make your onetime election for standard allowance

	Treasury COVID-19 Relief Hub	
State, Local and Tribal Support SLFRF Compliance	Revenue Replacement Recipients will have the option below to update or provide information associated with revenue replacement. Depending on your answer to the question, "Is your jurisdiction electing to use the standard allowance of up to \$10 million for identifying the	Draft Report Information Report Name SLT-9999 - P&E Report - Q1
Introduction/Bulk Templates Recipient Profile	revenue loss?" you will be asked conditional questions. Information that was previously provided as part of the Quarterly Report (if applicable) will display in this screen by selecting "Import Previous Report Data".	2022 Report Type Project and Expenditure Report
Project Overview Subrecipients/ Beneficiaries/ Contractors	Please note: during the period of performance covered by this report, the Interim Final Rule still applies. However, if your jurisdiction is calculating your "Revenue loss due to COVID-19 Public Health Emergency" using your fiscal year, you may do so by completing the "Fiscal Year End Date" field and entering your revenue loss in the same "Revenue loss due to COVID-19 Public Health Emergency" field.	Report Period Quarter 1 2022 (January-March Reporting Period Start Date 1/1/2022
Subawards/Direct Payments Expenditures Recipient Specific	Revenue Replacement Key Inputs & Import Previous Report Data	Reporting Period End Date 3/31/2022 Submission Deadline
Certification	*Is your jurisdiction electing to use the standard allowance of up to \$10 million, not to exceed your total award allocation, for identifying revenue loss? Yes If a recipient's total is \$10 million or greater, the recipient may enter in the amount or revenue loss the recipient is electing up to \$10 million.	4/30/2022 12:00 PM Allocated Amount \$10,000,000.00
	If a recipient's total allocation is less than \$10 million, the recipient may enter in the amount of revenue loss the recipient is electing up to your total allocation.	

<u>From</u> <u>Treasury's</u> <u>P&E Report</u> <u>Revenue</u> <u>Replacement</u> <u>Reporting</u> Webinar

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LOC

Enter full amount of your award (both tranches) * and provide narrative detail on the use of funds

Templates	Information that was previously provided as part of the Quarterly Report (if applicable) will display in this screen by selecting "Import Previous	Project an
Recipient Profile	Report Data".	Project al
Project Overview	Please note: during the period of performance covered by this report, the Interim Final Rule still applies. However, if your jurisdiction is	Report Period
Subrecipients/ Beneficiaries/ Contractors	calculating your "Revenue loss due to COVID-19 Public Health Emergency" using your fiscal year, you may do so by completing the "Fiscal Year End Date" field and entering your revenue loss in the same "Revenue loss due to COVID-19 Public Health Emergency" field.	Quarter 1 Reporting Per
Subawards/Direct	If that situation applies to you, please make clear in the "Provide an explanation" text box that you are using fiscal year for your calculation.	1/1/2022
Payments		Reporting Per 3/31/202
Expenditures	Revenue Replacement Key Inputs & Import Previous Report Data	0/01/202
Recipient Specific	* Is your jurisdiction electing to use the standard allowance of up to \$10 million, not to exceed your total award allocation, for identifying	Submission De 4/30/202
Certification	revenue loss?	Allocated Amo \$10,000,0
	If a recipient's total is \$10 million or greater, the recipient may enter in the amount of revenue loss the recipient is electing up to \$10 million.	
	If a recipient's total allocation is less than \$10 million, the recipient may enter in the amount of revenue loss the recipient is electing up to your total allocation.	
	*Revenue Loss Due to Covid-19 Public Health Emergency	
	*Were Fiscal Recovery Funds used to make a deposit into a pension fund?None	
\subset	*Please provide an explanation of how revenue replacement funds were allocated to government services Explanation	
	Salesforce Sans v 12 v B t u S = 15 4 4 B B B T.	

Expenditure Report

2022 (January-March)

d Start Date

d End Date

dline 12:00 PM

int 00.00

From Treasury's P&E Report Revenue **Replacement** Reporting Webinar

LOC League of Oregon Cities

* Estimated full allocations (both tranches) are available on the LOC website

Navigate to Certification tab and review

	Treasury COVID-19	Relief Hub				۲
	Certification					Draft Report Information
State, Local and Tribal Support SLFRF Compliance	Review Total Obligations: \$10,000,000.00		Total Expen \$5,000,000.0			Report Name SLT-9999 - P&E Report - Q1 2022 Report Type
Recipient Profile Project Overview	Total Number of Projects: 1 Total Number of Subawards: Total Number of Expenditure	Project and Expenditure Report Report Period Quarter 1 2022 (January-March)				
Subrecipients/ Beneficiaries/ Contractors	Project Overview Status	0 Project Status	Subaward Status	Expenditure Status		Reporting Period Start Date 1/1/2022
Subawards/Direct Payments	Complete	1	1	1		Reporting Period End Date 3/31/2022
Expenditures Recipient Specific			1			Submission Deadline 4/30/2022 12:00 PM
Certification	Statement					Allocated Amount \$10,000,000.00
		ent. The undersigned ackn ent or omission of a mater ility Act of 1996, as amend inistrative remedies for fal	owledges that any materiall ial fact) in this submission m led, 18 USC 1001, and also n	y false, fictitious, fraudulen ay be the subject of crimina nay subject me and the SLF uding under 31 USC 3729 e	t statement, or al prosecution under the RF Recipient to civil et seq.) The undersigned is an	

From Treasury's P&E Report Revenue **Replacement** Reporting Webinar



Only the Authorized Representative for Reporting may certify and submit

available to the SLFRF recipient. The undersigned acknowledges that any materially false, fictitious, fraudulent statement, or representation (or concealment or omission of a material fact) in this submission may be the subject of criminal prosecution under the False Statements Accountability Act of 1996, as amended, 18 USC 1001, and also may subject me and the SLFRF Recipient to civil penalties, damages, and administrative remedies for false claims or otherwise (including under 31 USC 3729 et seq.) The undersigned is an authorized representative of the SLFRF Recipient with authority to make the above certifications and representations on behalf of the SLFRF Recipient.

By signing this report, the Authorized Representative for Reporting a knowledges in accordance with 31 CFR 35.4(c) that recipients shall provide to the Secretary periodic reports providing detailed accounting of the uses of funds, as applicable, all modifications to a State's or Territory's tax revenue sources, and such other information as the Secretary may require for the administration of this program. In addition to regular reporting requirements, the Secretary may request other additional information as may be necessary or appropriate, including as may be necessary to prevent evasions of the requirements of this program. False statements or claims made to the Secretary may result in criminal, civil, or administrative sanctions, including fines, imprisonment, civil damages and penalties, debarment from participating in Federal awards or contracts, and/or any other remedy available by law.

Name of Current Login User

The information for the currently signed in user will populate as the Authorizer of this submittal. Only those in Role of Authorized Representative for Reporting or Authorized Representative on the Submission record will have access to Certify and Submit.

Name:	
Christopher	Su

Title: Reporting Lead Telephone:

Email:



From Treasury's P&E Report Revenue Replacement Reporting Webinar



Back

Green box shows successful submission, survey is optional

😽 Treasury COVID-19 Relief Hub

D-19 Relief Hub Success... Your Report has been Submitted

SLFRF Project and Expenditure Report Survey

Thank you for submitting your SLFRF Project and Expenditure Report. Please participate in the SLFRF Project and Expenditure Report Survey below. Your feedback is greatly appreciated and will help improve the reporting process.

1. How satisfied were you with the login and navigation of the portal?

Highly 🚖 🚖 🌟 🌟 Highly Dissatisfied 🚖

2. How satisfied were you with manually reporting in the Project and Expenditure Report?

Highly Dissatisfied 🗙 🚖 🚖 🛧 🛧 Highly Satisfied

3. How satisfied were you with reporting via bulk upload in the Project and Expenditure Report?

Highly 🗶 🛧 🌟 🛧 🖌 Highly Dissatisfied 🗶

4. How satisfied were you with the overall SLFRF reporting experience?

5 What ways could Treasury improve the SLERE reporting experience?

From Treasury's P&E Report Revenue Replacement Reporting Webinar



Keep good records!

- Reduced reporting requirements do not reduce your responsibilities or liabilities
- Treasury or another entity may come asking about specific expenditures in the future
- There is still a lack of clarity on whether single audit standards will apply
- Need to maintain the public trust and be good stewards of funds, you will be asked how you spent these dollars





There is no shortage of resources!

Documents

See also <u>Treasury's webpage</u>

- <u>Final Rule</u> the actual rule itself detail on reporting requirements
- <u>Overview of the Final Rule</u> a summary of major changes from the interim rule
- <u>April 2022 Project and Expenditure</u> <u>Report User Guide</u> – updated user guide with reporting instructions
- <u>Compliance and Reporting Guidance</u> detail on reporting requirements
- <u>NEU Supporting Documents User Guide</u> – account creation and supporting docs submission

Webinars

See also <u>Treasury's YouTube</u>

- <u>Project and Expenditure Report -</u> <u>Revenue Replacement</u> – overview of revenue replacement reporting
- <u>NEU Reporting Overview presentation</u>
- <u>NEU Reporting Overview webinar</u>
- <u>NEU Intro to Reporting</u> account creation, roles, supporting docs submission
- Introduction to the Final Rule good description of changes from the interim rule



Question Time!

Mark Gharst Lobbyist <u>mgharst@orcities.org</u> 503-991-2192

League of Oregon Cities

U.S. Treasury General Inquiries or Account Issues <u>SLFRP@treasury.gov</u> 844-529-9527

