

# OIG Recommendations For ARP-FRF

On May 19, 2021, the U.S. Department of the Treasury (Treasury) Office of the Inspector General (OIG) released a memorandum titled [American Rescue Plan – Application of Lessons Learned from the Coronavirus Relief Fund](#). Within this document, OIG details lessons learned and recommendations from their CRF monitoring and oversight process, and their potential application to the oncoming disbursement of the American Rescue Plan Act (ARP) – Fiscal Recovery Funds (FRF).

OIG has provided the following context and recommendations to assist in the implementation of ARP programs.

OIG Recommendation	Treasury Response
<b>Need for Clear and Timely Guidance</b>	
<ul style="list-style-type: none"><li>» Finalize guidance concurrent with funds distribution to facilitate efficient administration of programs and minimize recipient confusion and misuse of funds.</li></ul>	<ul style="list-style-type: none"><li>» Agrees with the OIG recommendation.</li><li>» Developed the Interim Final Rule (IFR) to provide further guidance on eligible uses and key terms to avoid misuse of funds and establish requirements.</li></ul>
<b>Need for Agreements with Terms and Conditions</b>	
<ul style="list-style-type: none"><li>» Apply the requirements of 2 CFR to Federal financial assistance funded through the ARP to the maximum extent authorized by law.</li><li>» Require signed agreements documenting standard terms and conditions before disbursing ARP funds.</li></ul>	<ul style="list-style-type: none"><li>» Generally, agrees with the OIG recommendation.</li><li>» FRF recipients will be required to certify their agreement with payment terms and conditions, including acceptance of the provisions of the IFR and applicable requirements of 2 CFR.</li></ul>
<b>Balancing Data Reporting &amp; Transparency and Recipient Burden</b>	
<ul style="list-style-type: none"><li>» Perform IT investment analysis before making a decision to implement the GrantSolutions, Salesforce, or another solution for the execution of ARP programs.</li></ul>	<ul style="list-style-type: none"><li>» Agrees with the OIG recommendation.</li><li>» Treasury is considering various options for the FRF reporting system and is undertaking a systems analysis with OMB guidance and IT management best practices.</li></ul>
<b>Outreach</b>	
<ul style="list-style-type: none"><li>» Continued outreach and technical assistance sessions with recipients and stakeholders.</li></ul>	<ul style="list-style-type: none"><li>» Agrees with the OIG recommendation.</li></ul>
<b>Need for Performance Measures</b>	
<ul style="list-style-type: none"><li>» Develop performance metrics to measure the effectiveness of ARP program funding in assisting with pandemic relief goals.</li><li>» Include recipient reporting requirements in written agreements to facilitate this process and ensure that needed information is collected quarterly.</li></ul>	<ul style="list-style-type: none"><li>» Generally, agrees with the OIG recommendation.</li><li>» Treasury will require large FRF recipients to provide the public and Treasury with an annual performance report of the projects they are undertaking with award funds and how they are planning to ensure program outcomes are achieved in an effective, efficient, and equitable manner.</li></ul>