



# Pandemic Recovery Office

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## AMERICAN RESCUE PLAN ACT (ARPA) CORONAVIRUS CAPITAL PROJECTS FUND (CPF) COMMUNITY LEARNING CENTER MUNICIPAL GRANT

**CPF Community Learning Center Municipal Grant Guidance**

**FEBRUARY 2025**

The CPF Community Learning Center (CLC) municipal grant is being implemented by the State's Pandemic Recovery Office (PRO) that sits within the Department of Administration and serves as the central office for policy coordination and compliance for ARPA. PRO initiated an application process in August 2023 through which 21 grants have been awarded to 18 municipalities for community learning center capital projects. Currently the subawards support fifteen renovation projects including four libraries, one acquisition, and five new construction projects. PRO has established a meeting cadence and task deadlines to help all subrecipients comply with the grant requirements effectively and efficiently. CPF projects are reviewed quarterly for progress, compliance, and documentation. All CPF subrecipients are expected to provide monthly financial reports and quarterly project reports based on a pre-established schedule provided by PRO at the time the subaward agreement was initiated.

During Stage 2 of the application process, PRO conducted 1-on-1 meetings with all applicant municipalities PRO then distributed a guidance document that recorded the grant compliance and programmatic advice provided during these meeting. It also provided an explanation of the State's evaluation criteria, timeline for next steps, and clarification on several questions raised during the Stage 2 municipal outreach.

This post-award guidance document provides additional information on compliance and grant management requirements. It also includes an ever-expanding list of FAQs that will be posted on the PRO website and updated there as new questions are received and answered by PRO. PRO recommends that subrecipients share this guidance document with all their project team members.

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## PROGRAM COMPLIANCE

### U.S. Treasury Program Compliance Requirement

To be considered eligible for funding under the Capital Project Fund (CPF) program, U.S. Department of Treasury (Treasury) requires projects to construct or improve buildings that are designed to jointly and directly enable work, education, and health monitoring. By “jointly” Treasury requires that all three programs should be operational concurrently at the facility. While not all services may be offered at all hours, there should be the possibility for someone to “walk in” and access some level of support that directly assists them in each of the three programmatic areas. The provision of computers with broadband access allows for this requirement to be met with ease and flexibility for all three uses.

### Three Dedicated Spaces

To maintain compliance with the grant, The CLC must have **a minimum of three (3) dedicated spaces to be created or repurposed**, with CPF funding, for the purposes of jointly and directly enabling work, education, and health monitoring.

Requirements for these spaces include:

- Spaces must be clearly shown on design schematics.
- The spaces must be available to tour and photograph during site visits.
- Each space must ensure privacy. Examples of privacy include:
  - Walls should run from floor to ceiling with sufficient sound proofing to ensure that conversations are not overheard.
  - Clear glass walls should not be used without an option to provide adequate privacy when the space is being used. For e.g.: frosted glass to ensure security while maintaining privacy, Shades / curtains on interior windows or glass doors.
- At least one of the spaces must be Americans with Disabilities Act (ADA) compliant: Projects are required to be ADA accessible to ensure that community members of all physical abilities can use the CPF funded community learning centers.
- The spaces must be permanently defined and available throughout the hours of operations.
- The spaces must be outfitted with reliable and free broadband internet access.
- The spaces must be outfitted with the appropriate equipment and technology (chair, desk, computer, etc.) to enable remote access to work, education, and health-monitoring related activities.
- The dedicated spaces may be interchangeable. None of the required activities needs to be limited to one specific space. For example, if a person walks in to conduct a remote job interview, that person should be able to use any one of the available dedicated spaces to complete their task.
- The spaces can be decentralized. There is no requirement that all three spaces must be contiguous, in the same space, or grouped together within the capital asset.
- The dedicated spaces do not have a minimum size requirement; however, each space must be large and comfortable enough for the user to complete their task. Again, at least one of the spaces must be ADA compliant.

### Eligible Uses

CPF funds may be used to build or renovate multipurpose community facilities that provide open and free access to all members of the community to receive programming and services that directly and jointly enable work, education, and health monitoring. U.S. Treasury has provided specific guidance on certain programs that are presumed eligible and others that are considered ineligible for the use of CPF funds.

- **Eligible Uses:** Libraries and community centers meet the facility requirements.
- **Ineligible uses:** Hospitals and traditional schools do not meet the facility requirements.

Recreational activities do not meet the programming requirements for work, education, and health monitoring.

CPF funding should not be used for recreation spaces. Spaces including, but not limited to, the following are generally not permissible; training/exercise rooms, gyms, locker rooms, showers or any other recreation supporting spaces. Consult PRO before the development of any type of recreation space to ensure compliance.

An eligible Capital Project is designed to jointly and directly enable work, education, and health monitoring. The programming carried out in the CLC should address those aspects of work, education, and health monitoring that were negatively impacted by the COVID-19 pandemic.

- Work: Activities to help community members engage in employment, search for employment, and/or develop the requisite skills and knowledge to become employed (e.g., participate in career counseling programs, workforce training programs, as well as gain access to internet websites to search for and apply to jobs).

A Project is not considered to directly enable work simply because individuals are employed at the location of the completed Capital Project; rather, the asset itself must enable new and further employment opportunities beyond employment at the location of the completed Project. In addition, job creation related to project construction and operations (e.g., employment of construction workers) would not satisfy this requirement.

- Education: Activities to acquire knowledge and/or skills, undertaken as part of a person's participation in school, an academic program, extracurricular program, social-emotional development program for students or youths, internship, or professional development program, or in another educational environment.
- Health Monitoring: Services to monitor an individual's health, including with respect to either physical or behavioral health. Health monitoring activities are often conducted as part of telemedicine appointments with a healthcare provider, but these activities can be conducted in a variety of other ways, such as during in-person appointments with health care providers or as part of community health screening programs.

The activities noted above need not be the exclusive function or purpose of the Capital Project, however, the use of CPF monies cannot be disproportionate to the final use of the Capital Project.

### Capital Asset Ownership

While it is preferred that the capital asset is owned by the municipality, private ownership is allowable if the municipality has a long-term lease to use the asset as its multipurpose community facility.

Proof of ownership and any supporting documents to establish compliance will be required and will be collected as an eCivis monitoring task.

### Hours of Operations

Community learning centers must have expansive and flexible operating hours to enable community members to use the facility in accordance with their schedule and convenience.

### Period of Performance

**By October 31, 2026, all projects should have achieved substantial completion and possess a Certificate of Occupancy and Beneficial Use.**

**Program operations must be initiated by December 31, 2026.** Treasury requires subrecipients to attest that the CLC projects will provide services or activities that jointly and directly enable work, education, and health monitoring for at least five years from the completion of the project and the start of operations.

**All funds must be expended by December 31, 2026,** which is the end of the period of performance. No payments may be made after this date, even if the expense was incurred and/ or funding was received by the subrecipient prior to this deadline.

For e.g.: Consider a scenario where subrecipient X receives \$1,000,000.00 in CPF funds from the State prior to December 31, 2026. By the end of the performance period, 'X' has only spent \$600,000 to pay invoices on its CLC project. As of January 1, 2027, 'X' is required to return \$400,000 back to the State even if there are additional unpaid invoices pending from any point in the period of performance. No payment may be made with CPF funds after December 31, 2026.

### Community Engagement

Development of the capital asset and programs offered should be consistent with the community's wants and needs. This should be determined through ongoing community engagement efforts. Subrecipients are required to conduct on-going community engagement through the end of the period of performance (December 31, 2026).

Community engagement must be multi-pronged, meaning that a compliant engagement strategy utilizes multiple channels to invite participation from a diverse group of community members.

Examples of compliant outreach would include a mix of the following types of activities; email blast, websites, paper flyers, tabling at community events, surveys (digital and hard copy), focus groups, town-hall meetings, listening sessions, partnership with community programming organizations.

As long as community engagement efforts are continually made to gather feedback from members of the community, there isn't a specific amount of participation required to satisfy the grant's requirements.

**Evidence of community engagement efforts will be collected through an eCivis monitoring task.** Proof would include digital copies of all handouts, links to websites and social media posts, meeting notes, etc.

## **Procurement**

Subrecipients must comply with the standards set forth in 2 CFR 200.317-327 for use in establishing procedures for the procurement of supplies and other expendable property, equipment, real property, and other services with subaward funds. These standards are furnished to ensure that such materials and services are obtained in an effective manner and in compliance with the provisions of applicable federal and State statutes and executive orders.

Per 2 CFR 200.319, all procurement transactions for the acquisition of property or services required under a Federal award must be conducted in a manner providing full and open competition consistent with the standards of this section and 2 CFR 200.320. All work performed and paid with CPF funding must be competitively procured unless a local ordinance allows otherwise.

Subrecipients must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following:

- Rationale for the method of procurement
- Selection of contract type
- Contractor selection or rejection
- Basis for the contract price

**Proof of competitive procurement will be collected as an eCivis monitoring task.**

Some actions will not satisfy the requirement of competitive procurement as they are restrictive of competition. Those actions include, but are not limited to, the following:

- Placing unreasonable requirements on firms for them to qualify to do business.
- Requiring unnecessary experience and excessive bonding.
- Noncompetitive pricing practices between firms or between affiliated companies.
- Noncompetitive contracts to consultants that are on retainer contracts.
- Organizational conflicts of interest.
- Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement.
- Any arbitrary action in the procurement process.

Treasury encourages Recipients to prioritize in their procurement decisions employers who can demonstrate:

- Their workforce meets high safety and training standards, including professional certification, licensure and/or robust in-house training.
- Prioritization in hiring of local workers and/or workers from historically disadvantaged communities.
- Direct employment of their workforce, or policies and practices in place to ensure contractors and subcontractors meet high labor standards.
- No recent violations of federal and state labor and employment laws.

PRO requires all payees of subrecipients to provide a valid unique entity identification (UEI) number. One reason is to identify entities that have been disbarred from receiving federal awards. Failure to collect and provide UEI numbers may impact a municipalities ability to drawdown future funds. UEI numbers of subrecipient payees will be collected in the monthly transaction log delivered to PRO.

### Labor Practices/Standards

Projects funded by the Capital Projects Fund must comply with all applicable federal laws and regulations, and with all requirements for state, local, and Tribal laws, and ordinances to the extent that such requirements do not conflict with federal laws. Rhode Island's prevailing wage law applies to all CPF projects.

Treasury encourages Recipients to ensure that Capital Projects incorporate strong labor standards, including project labor agreements and community benefits agreements that offer wages at or above the prevailing rate and include local hire provisions, not only to promote effective and efficient delivery of high-quality infrastructure projects but also to support the economic recovery through strong employment opportunities for workers.

### Davis Bacon Prevailing Wage

Neither the Davis-Bacon Act nor Davis-Bacon Act related provisions requirements apply to projects funded solely with award funds from the Capital Projects Fund in RI. Recipients may be subject to the requirements of the Davis-Bacon Act, when CPF funds are used in conjunction with funds from another federal program that requires enforcement of the Davis-Bacon Act.

*Does Davis-Bacon apply to my project?*

CPF Allocation	Other Funding	Does the other funding require Davis-Bacon	Davis Bacon Required
< \$5M	No	-	No
< \$5M	Yes	No	No
<b>&lt; \$5M</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
>= \$5M	No	-	No
>= \$5M	Yes	No	No
<b>&gt;= \$5M</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

**Proof of complying with labor standards will be collected as an eCivis monitoring task.**

### NEPA: National Environmental Policy Act (NEPA)

Projects funded by the Capital Projects Fund must comply with all applicable federal environmental laws. Generally, NEPA does not apply to projects funded solely by the Capital Projects Fund. Prior to funding a Capital Project, Recipients may complete an environmental checklist, to be made available on the Capital Projects Fund website, to determine whether certain environmental laws apply. Generally, Capital Projects that do not involve construction activities will not be subject to federal environmental review requirements.

**Link to Checklist:** <https://home.treasury.gov/system/files/136/CPF-Environmental-Questionnaire.pdf>

**Projects supported with payments from the Capital Projects Fund may still be subject to NEPA review if they are also funded by or otherwise involve actions from other federal programs or agencies that are subject to NEPA review.**

### **Historical Review: Historic Preservation and Heritage Commission (HPHC) / National Historic Preservation Act (NHPA)**

An NHPA Historical review is not required for projects fully funded by CPF. However, projects supported by CPF funds may still be subject to NHPA review if they are also funded by other federal financial assistance programs or have certain federal licensing or registration requirements. While an NHPA review is not required for a CLC project fully funded by CPF projects, all State building laws and requirements still apply. If a facility is on the State or National Historic Register, then an HPHC review is required. In that case, subrecipients are strongly advised to engage HPHC as soon as they have procured their Architectural and Engineering (A&E) services.

### **Permits, Building Codes & Commission Certificate**

Projects funded by the Capital Projects Fund must comply with all applicable federal laws and regulations, and with all requirements for state, local, and Tribal laws, and ordinances to the extent that such requirements do not conflict with federal laws.



## GRANT FINANCE MANAGEMENT

### Financial Management

Subrecipient Financial Management systems must include the following:

Identification of Federal Award: Identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received. Federal program and Federal award identification must include the Assistance Listing title and number, Federal award identification number and year, name of the Federal agency and name of the pass-through entity.

Financial Reporting: Each state must expend and account for the Federal award in accordance with state laws and procedures for expending and accounting for the state's own funds. In addition, the state's and the other non-Federal entity's financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the Federal award, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditure adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award

Source of Funds: Records must identify the source and application of funds for federally funded activities including matching funds and program income. These records must contain information pertaining to Federal Awards and subaward, authorizations, obligations, unobligated balances, assets, expenditures, income, and interest and be supported by source documentation.

Internal Control: Subrecipient Entity must ensure effective control over, and accountability for, all funds, property, and other assets. Subrecipient Entity must safeguard these assets and ensure they are used only for authorized purposes. 2 CFR 200.303 (Internal Controls).

Expenditures: Comparison of expenditures with budget amounts for each federal award and subaward.

Payment Procedures: Written payment procedures. See 2 CFR 200.305

Allowability of Costs: Written procedures for determining allowability of costs in accordance with 2 CFR 200 Subpart E (Cost Principles), and conditions of the Federal Awards and/or subawards.

**Proof of a sufficient financial management system will be collected as an eCivis monitoring task.**

### Allowable Project Costs

As outlined in the Uniform Guidance at 2 CFR Part 200, Subpart E regarding Cost Principles, allowable costs must meet the following criteria:

1. Be allowable, necessary, reasonable, and allocable for the performance of the Federal award,
2. Be categorized accurately and consistently by the type of cost (fees, construction, design, equipment, etc.), and
3. Be adequately documented.

Subrecipients are responsible for the effective administration of Federal awards, application of sound management practices, and administration of Federal funds in a manner consistent with the program objectives and terms and conditions of the award.



Some examples of **eligible** project costs would include, but is not limited to, the following:

- Costs of repair, rehabilitation, construction, improvement, and acquisition of real property, equipment (e.g., devices and office equipment), and facilities (e.g., telecommunications equipment, including infrastructure for backhaul, middle, and last mile networks).
- Personnel costs including salaries and fringe benefits for CPF-dedicated staff and consultants required for carrying out a Capital Project (such as project managers, subject matter experts, equity consultants, financial consultants, and attorneys).
- Ancillary costs necessary to operationalize and put the capital assets to full use, including costs to increase broadband adoption and improve digital literacy.
- Costs associated with monitoring of and reporting on Projects in compliance with Treasury requirements, including award closeout costs.
- Costs associated with collecting and measuring performance data and conducting activities needed to establish and maintain a performance management and evaluation regime related to Projects funded by the Capital Projects Fund program.

Some examples of **ineligible** project costs (unless otherwise permitted by the U.S. Treasury) would include, but is not limited to, the following:

- Acquisition of spectrum licenses.
- Operating expenses.
- Short-term operating leases.
- Payment of interest or principal on outstanding debt instruments, or other debt service costs incurred prior to March 15, 2021.
- Fees or issuance costs associated with the issuance of new debt.
- Satisfaction of any obligation arising under or pursuant to a settlement agreement, judgment, consent decree, or judicially confirmed debt restructuring plan in a judicial, administrative, or regulatory proceeding.
- To support or oppose collective bargaining. This does not affect the ability to use funds to comply with 41 CFR Part 60-14.

### **Project Budget Documents**

Each year, subrecipients are expected to revisit their budget workbooks, adjust for actuals and future expectations, and resubmit the template to PRO. Once a submission is approved, the subrecipient should make the necessary adjustments to their budget in eCivis.

The budget allocations in eCivis needs to be updated every time there is a change to a subrecipient's budget. Funds are drawdown based on the expense categories. Budgets will be compared to transaction logs to ensure spending is occurring as planned.

Subrecipients should not expense categories that have no planned budget or no remaining budget. This will trigger a review with PRO to ensure accurate spending.

In March and September 2026, PRO will initiate a budget reconciliation exercise to ensure that all expenses are accurately reported in eCivis.

## Payment Procedures

Funding requests should only be made as needed but can be initiated at any time either on a reimbursement basis to cover outlays already incurred or as advances on anticipated outlays. The amount of payment will be determined by the quarterly breakdown of your CPF budget as submitted. Payment will be made upon PRO approval.

Appendix VIII determines the expected pace of spend, however, if the project is moving faster/slower than expected and expenses are being incurred sooner/later than expected, your payment request may be modified. Modification will require a written explanation of the change request as well as PRO approval prior to the payment request being made. These emails should be added to into the eCivis payment request as attachments.

After the first payment, all subsequent payments will be approved upon demonstration that 80% or more of all previously received CPF funds has been expended. Payment requests should include the following types of attachments; invoices, checks, other documentation to verify that CPF funds are only being used for allowable capital costs.

Monthly transaction logs tracking allowable expenses and pace of expenditure are required. Projects not complying with this deliverable will not be approved for any future payment request.

Subrecipients are required to minimize the time elapsing between drawdowns of award funds and outlays of award funds. All funds should be spent within 90 days of receiving them from the State.

For additional guidance on submitting a payment request, please review the RI Grants Management Office's tutorial: <https://www.youtube.com/watch?v=fIE-PEdCCtl>.

## Program Income

Any program income generated from CPF funds must be used for the purposes and under the conditions of CPF. Treasury requires that program income be utilized and applied to benefit the same project from which it was generated.

Program income is defined as the gross income earned that is directly generated by a supported activity or earned due to CPF award funds during the period of performance. Program income includes but is not limited to income from fees for services performed or fees from the use or rental of real or personal property acquired under federal awards.

Per 2 CFR 200.307 – Addition. Program income is added to the total allowable costs, increasing the overall total amount of the federal award. Regardless of program income, subrecipients will be entitled to the total amount of CPF funding awarded. All program income must be reported to UST as part of the quarterly Project & Expenditure report. Instructions on how to report program income will be provided by PRO to those subrecipients whose projects have generated program income.

Recipients are required to add program income to their CPF award pursuant to 2 CFR 200.307(e)(2) (see page 14). Note that program income must be utilized and applied to benefit the same project from which it was generated.

Raising funds through naming rights of a building room, wing, etc. would be considered program income. Money earned through these transactions would need to be reported to PRO and subsequently to UST. The money earned would have to be spent on eligible capital expenses for the CLC project.

**Interest earned on advances of federal funds is not program income.** Recipients are not required to deposit CPF funds in a separate bank account; however, they must track and account for CPF funds appropriately. Recipients are also required to track interest earned on CPF funds.

There are no Federal requirements governing the disposition of income earned after the end of the period of performance for the Federal award unless the Federal awarding agency regulations or the terms and conditions of the Federal award provide otherwise. The Federal awarding agency may negotiate agreements with recipients regarding appropriate uses of income earned after the period of performance as part of the grant closeout process.

### **CMIA: Cash Management Improvement Act**

Capital Projects Fund payments made to states and territories are subject to the requirements of the Cash Management Improvement Act (P.L. 101-453) and U.S. Treasury's implementing regulations at 31 CFR part 205. CPF payments made to freely associated states are subject to the cash management requirements described in the Uniform Guidance at 2 CFR 200.305(b).

Subrecipients are required to minimize the time elapsing between drawdowns of award funds and outlays of award funds. All funds should be spent within 90 days of receiving them from the State.

### **Inclusion of Grant Funding Source in Public Content**

If goods and services are being paid with CPF funds, subrecipients shall include the following language in the solicitation and contract documents:

*This project [is being] [was] supported, in whole or in part, by federal award number CPFFN00169 awarded to the State of Rhode Island by the U.S. Department of Treasury.*

This language can also be found on page 5 of Appendix IV – CPF Terms and Conditions of the subaward agreement.

The same language should also be used in any public-facing outreach (i.e. signage at site, publications, etc.)

### **CPF Payment Request Process**

All payment requests from PRO must be submitted through eCivis. Please review the following tutorial for more information on the submission process: <https://www.youtube.com/watch?v=fIE-PEdCCtI>

For the first payment request:

- Municipalities must ensure that the amount being requested is less than or equal to what is indicated in the most current budget workbook as submitted to PRO.
- Municipalities must confirm that the funds can be spent within 90 days of receipt.
- Municipalities do **NOT** need to submit any invoices with this request.

For the second payment request:

- Municipalities must ensure that the amount being requested is less than or equal to what is indicated in the most current budget workbook as submitted to PRO.
- Municipalities must confirm that the funds can be spent within 90 days of receipt.
- Municipalities must attach the most recent transaction log to the payment request in eCivis.

- Municipalities must demonstrate that 80% of previously received funds have been expended by including paid invoices in the payment request.
  - Each invoice must be accompanied by its own back up documentation uploaded as a pdf with a file name that matches Column H (Vendor and Invoice Number) of the transaction log.
  - Each invoice bundle should include the invoice, a canceled check or ACH confirmation, and billing details.

For all additional payment requests:

- Municipalities must ensure that the amount being requested is less than or equal to what is indicated in the most current budget workbook as submitted to PRO.
- Municipalities must confirm that the funds can be spent within 90 days of receipt.
- Municipalities must attach the most recent transaction log to the payment request in eCivis.
- Municipalities must demonstrate that 80% of previously received funds have been expended by including paid invoices in the payment request.
  - Each invoice must be accompanied by its own back up documentation uploaded as a pdf with a file name that matches Column H (Vendor and Invoice Number) of the transaction log.
  - Each invoice bundle should include the invoice, a canceled check or ACH confirmation, and billing details.
  - **Only paid invoices not previously submitted to PRO need to be included in the request.**

If one payment is being used to cover multiple invoices, each invoice bundle should include a copy of the same check/proof of payment.

If the project is progressing faster than expect and more money needs to be requested than what is indicated in Appendix VII, then before the payment request is completed in eCivis, the municipality should send an email to PRO detailing what the additional money is for. Once PRO approves the need for additional money, please submit the payment request as detailed above and include the email confirmation from PRO as an attachment in the eCivis payment request.

### Recommended Naming Conventions

**Vendor Contract Number:** Subaward Number – Contract ID  
200XX – ContractABC123

**Invoice Number:** Subaward Number – Contract ID – Invoice Number  
200XX – ContractABC123 – #101

## FAQs

**Q1: Can we change our project or project location?**

The CPF Community Learning Center location cannot be changed at this point.

Subrecipients may modify the scope to further clarify the project as described to PRO during the application stages. Significant alterations to the project scope are discouraged. Any modifications to the scope deliverable finalized by December 2024 will require written PRO approval.

**Q2: Are there any chances for another allocation or supplemental funding if the cost of our total project increases?**

CPF allocation is capped at the CPF funds ceiling established by December 2024. This accounts for other funds formally committed to the project and is confirmed at a budget check-in every six months starting in June 2024. Future allocations of CPF funds are unlikely to exceed that amount. Any modifications to the budget finalized by December 2024 will require written PRO approval.

**Q3: Can our programs pivot or evolve over the 5 years or is what is committed from Day 0 what needs to remain in effect until the 5-year mark?**

The exact services or activities may change over time to respond to community need, so long as the Capital Project directly and jointly enables all three activities of work, education, and health monitoring for at least five years from the completion of the Project.

**Q4: Is the offering of childcare services at the CLC considered directly enabling work?**

Childcare is **NOT** considered to be directly enabling work.

**Q5: Can subrecipients use vendors from the State's Master Price Agreement (MPA) without going through the traditional Request For Proposals (RFP) process?**

Municipalities may use the State's MPA for procuring vendors in accordance with local/state laws. Each MPA has a dollar threshold below which vendors can be solicited through a bid process. Municipalities could invite bid proposals for its project from several vendors on the MPA and then select the vendors most appropriate for the project based on criteria the Town defines. If the contract amount exceeds the MPA threshold then the Town will have to do a traditional RFP or, if municipality procurement laws state differently, follow local procurement regulations.

**Q6: Must professional consultants be procured through a competitive bid process?**

All goods and services paid for with CPF funds must be procured in accordance with local/state or federal procurement regulations as noted in the subaward agreement. Any entity who is paid using CPF funds directly by the subrecipient must be competitively procured. If the subrecipient awards the CPF

funds to another entity for the purposes of implementing the project, then any entity who is paid by that subawardee using CPF funds must be competitively procured.

**Q7: Can any CPF awarded funds be used to lobby federal, state, or local officials, or their staff to receive additional funding or influence legislation?**

A: No. See 2 CFR 200.450.

## Additional Resources

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### U.S. Treasury Guidance:

<https://home.treasury.gov/system/files/136/Capital-Projects-Fund-Guidance-States-Territories-and-Freely-Associated-States.pdf>

<https://home.treasury.gov/system/files/136/Revised-CPF-State-Guidance.pdf>

<https://home.treasury.gov/system/files/136/2023-CPF-Compliance-Supplement.pdf>

### Code of Federal Regulations (2 CFR 200)

General Procurement: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR45ddd4419ad436d/section-200.318>

Competitive Procurement: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR45ddd4419ad436d/section-200.319>

Cost Principles: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E>

Program Income: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/section-200.307>

Federal Payment: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/section-200.305>

### Rhode Island Department of Labor and Training Resources

Rhode Island D.L.T Prevailing Wage: <https://dlt.ri.gov/regulation-and-safety/prevailing-wage>

Prevailing Wage Addendum: <https://dlt.ri.gov/forms>

License Search: <https://dltweb.dlt.ri.gov/profregsonline/LicenseSearch>

### Other Links

Davis Bacon Reference Material: <https://www.dol.gov/agencies/whd/government-contracts/construction/guidance>