

**City of Pensacola**  
**Subrecipient Requirements and Guidelines**  
**American Rescue Plan Act (ARPA)**  
**(Non-Infrastructure)**

1. Must be able to demonstrate that organization is a current, active 501c(3).
  - a. Must be listed on Sunbiz
  - b. Must be listed as a valid 501c(3) on irs.gov or provide the most recently completed Form 990 submitted and accepted by the Internal Revenue Service (IRS).
2. Must have a DUNS number
3. All expenditures must be for a public purpose.
4. Funds may not be used as match for other federal grants or programs.
5. Organizations who receive awards from these funds will be considered subrecipients as defined in the attached interim final rule.
6. All expenditures under this program must be incurred by 12/31/2024 and spent by 12/31/2026. In all cases “incurred” has the same definition as “financial obligation” contained in 2 CFR 200.1.
  - a. Financial obligations, when referencing a recipient’s or subrecipient’s use of funds under a Federal award, means orders placed for property and services, contracts and subawards made and similar transactions that require payment
7. All subrecipients will be required to submit quarterly and annual reports in the form and timeline required by the City.
8. There are 4 categories of eligible uses for this funding. All subrecipients receiving funding under this program will expend monies under the terms of the first category which is “to respond to the public health emergency or its negative economic impacts...” More specifically these funds must be expended to reduce, prevent or mitigate homelessness in the City of Pensacola. A list of allowable uses include but are not limited to the following:
  - a. Counseling and legal aid services to prevent eviction or homelessness
  - b. Supportive housing for those currently or in danger of experiencing homelessness
  - c. Providing access to stable affordable housing to unhoused individuals
  - d. Housing vouchers to those currently or in danger of experiencing homelessness
  - e. Residential counseling or housing navigation assistance to those currently or in danger of experiencing homelessness
  - f. Medications and behavioral health services including mental health and substance abuse treatment for those currently or in danger of experiencing homelessness
  - g. Case management costs directly related to services for those currently or in danger of experiencing homelessness
  - h. Acquisition of personal identification including but not limited to Florida ID cards and licenses, birth certificates and Social Security cards for those currently or in danger of experiencing homelessness
9. All expenditures must comply with all other relevant aspects of the attached interim final rule and the attached Compliance and Reporting Guidance.
10. All expenditures and programs must be directly related to the harmful economic disruptions resulting from or exacerbated by the COVID-19 public health emergency.
11. All expenditures must be spent on:
  - a. A program or service physically located in a Qualified Census Tract (QCT)

- b. Programs or services where the primary intended beneficiaries live within a QCT
  - c. Programs or services for which the eligibility criteria are such that the primary intended beneficiaries earn less than 60% of the median income
  - d. Programs or services for which the eligibility criteria are such that over 25% of the intended beneficiaries are below the federal poverty line.
12. All funds awarded to subrecipients will be granted on a reimbursement basis only. This means that the organization must be fully capable of expending funds first then seeking reimbursement afterward.
13. Every subrecipient must ensure no benefits or services are denied to individuals otherwise, discriminated against on the basis of race, color, national origin (including limited English proficiency), disability, age, or sex (including sexual orientation and gender identity in accordance with all federal, state and local laws and regulations).