



Agenda Action Form Overview

The Board is requested to approve the adoption of two ARPA/CSLFRF compliance policies the Conflict of Interest Policy and the Non-Discrimination Policy for use in joining with Durham County's administration of its American Rescue Plan Act (ARPA) Coronavirus State and Local Fiscal Recovery Funds (CSLFRF) award. Both policies are already in effect as part of the County's standing personnel and procurement policies; this action formally ratifies and adopts them by Board resolution specifically as ARPA/CSLFRF compliance documents, as required to satisfy federal subrecipient and direct-recipient monitoring standards under 2 CFR Part 200 (Uniform Guidance) and the U.S. Treasury Final Rule for the Coronavirus State and Local Fiscal Recovery Funds program.

Background/Justification

On June 27, 2022, the Board approved the related Grant Ordinance appropriating the full \$62,445,275 ARPA/CSLFRF allocation across the County's strategic plan goal areas, consistent with the approved Framework and with the spending parameters established by the U.S. Treasury Interim Final Rule. Durham County Government has long maintained a Conflict of Interest Policy and a Non-Discrimination Policy as part of its regular personnel and procurement policy framework, applicable to County employees, officials, vendors, and subrecipients across all County operations, including federally funded programs. County staff were notified that these existing policies must be formally adopted and approved by the Board of County Commissioners as standalone ARPA/CSLFRF compliance documents, notwithstanding that the substantive policies already govern County conduct. This requirement reflects federal expectations that recipients of ARPA/CSLFRF funds maintain documented, governing-body-approved conflict of interest and non-discrimination standards specific to the federal award, separate from and in addition to general County policy adoption.

Policy Impact

Adoption of these policies does not create new substantive obligations for County employees, This action does not change anything employees, officials, or vendors are required to do. The County already has a Conflict of Interest Policy and a Non-Discrimination Policy in place, and both already apply to County operations.

Recommendation

The County Manager recommends the Board approve the attached Conflict of Interest Policy and Non-Discrimination Policy as the County's official ARPA compliance documents.