

ARPA 2022 – REQUIREMENTS FOR APPROVAL OF ARPA FUNDS by PULASKI COUNTY

- **The Final Rule will be the standard used for all applicants for ARPA Monies.**
- **Reference Notations are from the Federal Register / Vol. 87, No.18 / Thursday, January 27, 2022 / Rules and Regulations.**
<https://www.ecfr.gov/current/title-31/subtitle-A/part-35>
- The Final Rule effective date is April 1, 2022. Until then, the Interim Final Rule remained in effect.
- Pulaski County will consider applications for Premium Pay for the Covid-19 public health emergency for the time period of January 27, 2020 through January 27, 2022.

1. **Time Period for Payment of Benefits** will be as stated above, January 27, 2020 through January 27, 2022.
(Reference <https://www.ecfr.gov/current/title-31/subtitle-A/part-35>)
2. Applicants will be responsible for adhering to the Final Rule as issued by the Department of the Treasury.
3. **All equipment requests will be paid on a cost share** between the County and Applicant. The County cost share to be a maximum of 80%, with the Applicants minimum cost share of 20%. Equipment payments by the County will be issued after supporting documentation has been submitted by the applicant, for the applicant's payment of the cost share amount.
4. **Applicants applying for Premium Pay** based on an hourly wage must have documentation for how Premium Pay was calculated and the requested amount, for each individual whether a Full or Part-time employee.
5. **3 Parts Premium Pay.** (Ref. page 4397, paragraph 3)
 - Eligible Worker
 - Essential Work
 - Response to Eligible Workers performing Essential Work “during the Covid -19 public health emergency.”

- “The ARPA defines ‘**eligible workers**’ as ‘those workers needed to maintain continuity of operations of essential critical infrastructure sectors and additional sectors as each ... (government) may designate as critical to protect the health and wellbeing of its residents.’”
(Ref. page 4397, Eligible Workers)
- “The interim final rule defined ‘**essential work**’ as work that (1) is not performed while teleworking from a residence and (2) involves either (i) regular, in-person interactions with patients, the public, or coworkers of the individual that is performing the work or (ii) regular physical handling of items that were handled by, or are to be handled by patients, the public, or coworkers of the individual that is performing the work.”
(Ref. page 4398, Essential Work)
- **Premium Pay** is defined as, “The statute defines premium pay as ‘an amount of up to \$13.00 per hour... in addition to wages or remuneration the eligible worker otherwise receives, for all work performed by the eligible worker during the COVID-19 public health emergency. Such amount may not exceed \$ 25,000.00 with respect to any single eligible worker.’” (Ref. page 4399, Definition of Premium Pay)

6. **Premium Pay** “is designed to compensate workers that, by virtue of their employment were forced to take on additional burdens and make great personal sacrifices as a result of the COVID-19 public health emergency. Premium pay can be thought of as hazard pay by another name.”

- Deceased Employees are not eligible for Premium Pay
- Remote work hours are not eligible.
- Compensatory pay for Volunteers may be considered by the applicant, with adherence to the Final Rule.
- **Premium Pay** payments to eligible workers may not exceed 150% of the State Average Wage, of \$24.71, as determined by the US Bureau of Labor and Statistics.

(Ref. https://www.bls.gov/oes/current/oes_mo.htm)

**State of Missouri Average Annual Wage
U.S. Bureau of Labor Statistics**

https://www.bls.gov/oes/current/oes_mo.htm

Occupation code	Occupation title (click on the occupation title to view its profile)	Level	Employment	Employment RSE	Employment per 1,000 jobs	Location quotient	Median hourly wage	Mean hourly wage	Annual mean wage	Mean wage RSE
00-0000	All Occupations	total	2,728,100	0.0%	1000.000	1.00	\$18.33	\$24.71	\$51,390	0.4%

$$\frac{\$24.71 \times 150}{100} = \$37.07/\text{hr.}$$

- **This means no payment calculated can exceed \$ 37.07 per hour.**

7. Pulaski County has adopted or established the additional criteria for all County “eligible workers”. It is recommended that applicants do the same.

- Remote work hours are not eligible.
- Compensatory pay for Volunteers is allowable, and is submitted under **ARPA-ELIGIBLE ACTIVITIES**, 1. Support public health expenditures. Compensatory pay for Volunteers may be considered by the applicant, with adherence to the Final Rule.
- Volunteers should have been actively volunteering for a period of at least 180 days during the Covid-19 public health emergency time period of January 27, 2020 through January 27, 2022.
- Eligible workers must have worked a minimum of 180 days during the Covid-19 public health emergency time period of January 27, 2020 through January 27, 2022.
- If a worker has left the County Employment, in order to be considered, they would have had to have left as an employee in good standing. This

means, have worked a minimum of 180 days during the Covid-19 public health emergency time period of January 27, 2020 through January 27, 2022, served a 7 day or more notice, and would be considered for rehire with the County.

- If the Applicant wishes to include separated employees for consideration of Premium Pay, the responsibility for locating separated employees that may meet the above criteria is with the Applicant. The County bears no responsibility or accountability for who is or is not included in an applicant request for premium pay.
- Consideration of Eligibility of any County separated employee will be reviewed on an individual basis.
- The County Commission and/or Committee may request any additional information or documentation it deems necessary for the application review.

4 Tier Payment Schedule

1. **High Risk – High Exposure** - Must be a Full-time employee with full-time or 100% exposure, due to job duties performed, and 40 hours per week or more.
Example; EMT, Firefighters, Police Officers/County Sheriff Deputies
2. **Elevated Risk** – Must be a Full-time employee, with high exposure of 75%, due to job duties performed.
Example; Jailers.
3. **Moderate Risk** – Full and part-time employees, with 50% exposure, due to job duties performed behind protective glass, and minimal public contact.
Example; Dispatch, Reserves with an average of 18 hours worked per month, County Courthouse Staff.

4. **Low Risk - Minimal Exposure** - Full and part-time employees, with 25% or less exposure, due to job duties performed. Split Shift workers, or workers performing job duties totally behind protective glass with very little public contact, or workers performing job duties totally behind protective glass with no public contact or access permitted.

Example; 911 Dispatch, Road and Bridge workers.