

NCACC “Ask an Expert” Overview Records and Retention Management Meeting

February 16, 2023



NCACC’s ARPA Expert Panel met on February 16, 2023, to discuss records retention requirements for the American Rescue Plan Act (ARPA) State and Local Fiscal Recovery Fund (SLFRF) program. Below are key takeaways from the meeting.

Make a Plan

- SLFRF records need to be retained for five years after the money is spent. This is a longer period than the federal government or state law typically requires.
- Adopt an addendum to your existing records retention policy or ARPA specific policy that applies only to SLFRF records.
 - The UNC School of Government offers a [sample records retention policy](#).
 - Don’t let the policy remain on the shelf - follow the procedures outlined in the policy! Your policy is your tool to guide staff and designate who is responsible for each component of compliance.
- Review the [SLFRF compliance supplement](#) to see how auditors will test compliance, and ensure you have a plan to organize and share any relevant documentation with the auditor.
- Name a “records lead” for your ARPA team! This is key to successful implementation.
- Have a plan to ensure U.S. Treasury portal access and discuss records retention during employee onboarding and offboarding to mitigate disruptions caused by staff turnover.

Follow the Plan

- Ensure multiple people know where ARPA records are stored and how they are organized- it is important to build in redundancy for records retention in case key staff leave!
- Clearly document all your decisions. Put in writing your rationale and justification for eligibility and allowability of costs and explain why it is reasonable and consistent. Note the specific sections of U.S. Treasury guidance that back up your decisions.
- Avoid paper! Share files using a well-organized system and repository – consider tools like SharePoint or OneDrive.
- When individuals prepare to depart the organization, be sure to gather all the information they may have about records, including access to the U.S. Treasury portal and file systems.

Review the Plan

- Think 5 years out. Because records must be kept for that length of time, you need to ensure relevant records are not lost in that period, especially if key staff leave.
- Provide future staff members with a road map to find all the appropriate documentation in 5 years’ time. Include this in your onboarding process for new staff.
- Consider who might check on your records retention progress. Your auditor, the state comptroller, U.S. Treasury, U.S. Treasury’s Office of Inspector General, the Government Accountability Office and their authorized representatives may request records in order to conduct audits or other investigations. It is important to be ready for these situations!