

January 21, 2026



ARPA and PREP Technical Assistance Training



Before we start...

- Ensure your microphone has been muted.
- Sign in using the chat feature to receive credit.
- Engage and ask questions.
- The presentation will be emailed to attendees after the training.



Contact and Support

For all ARPA and PREP projects, please contact the appropriate staff member listed below for clarification on rules and policy requirements.

- Emmitt Grayson | emmit.grayson@okcommerce.gov | 405-397-1875
- Taressa Jones | taressa.jones@okcommerce.gov | 405-397-0292
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Agenda

- Oklahoma Grant Exchange (OGX)
- ARPA and PREP Program Overview
- Environmental Review
- Procurement
- Financial Management
- Contract Development
- Labor Standards Applicability
- Monitoring
- Monitoring Red Flags
- Closeout
- Reporting Requirements
- Common Issues

Oklahoma Grant Exchange (OGX)



Grants Management System Changes

OKGrants has transitioned to the Oklahoma Grant Exchange (OGX)



OGX Grantee User Manual



OKLAHOMA GRANT EXCHANGE - OGX

Dashboard

Use the below panels to work with your Grants and Funding Opportunities.

My Tasks

[Initiate Related Document](#)

▸ Filter

My Opportunities

▸ Filters

Training Materials

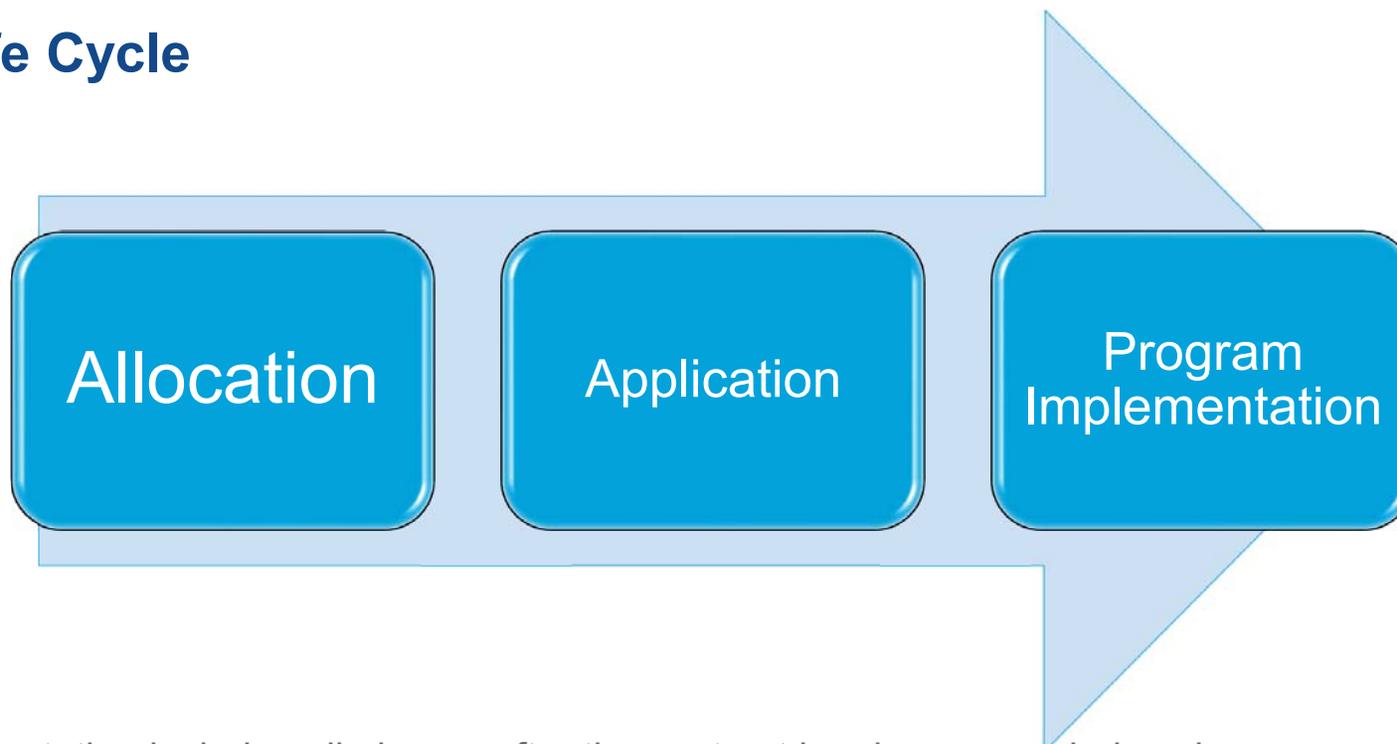
- OGX Grantee User Manual ←
- ODAC Admin Webinar

If you need instructions on navigating the new system, please review the **OGX Grantee User Manual** located in the upper right-hand corner

You can also review the recorded training on OGX, which will be provided using the same link.

ARPA and PREP Program Overview

Project Life Cycle



Program Implementation includes all phases after the contract has been awarded such as:

- ✓ Release of Funds / Environmental Review (ARPA Specific)
- ✓ Advance Request / Reimbursement Claims
- ✓ Monthly Expenditure Reports in OGX
- ✓ Monthly Project Status Report
- ✓ Desk Monitoring
- ✓ Closeout

Authority

- The Allocated **ARPA Infrastructure Program** is designed to provide necessary infrastructure development to Oklahoma communities. The Legislature of the State of Oklahoma has allocated money received by the State of Oklahoma from the American Rescue Plan Act of 2021 (ARPA) to specific infrastructure sites across the state. The Legislature awarded these funds to the Oklahoma Department of Commerce to disperse through grants to enhance industrial parks, airparks, and ports to cover costs related to water, wastewater, sewer, and broadband projects eligible under the provisions of the American Rescue Plan Act of 2021 that support sites or surrounding communities identified by the Department as having such needs. This program is authorized under the American Rescue Plan Act of 2021, Public Law 117-2, Sections 602 and 603, and implemented pursuant to 31 CFR Part 35 (Coronavirus State and Local Fiscal Recovery Funds), and all applicable federal requirements incorporated therein.
- The **PREP Infrastructure Projects Program** 150:175-1-1 is designed to provide rules and program information for the Progressing Rural Economic Prosperity Fund created in Enrolled House Bill No. 4456 of the 2nd Session of the 58th Oklahoma Legislature to fund facility upgrades, including electric, water, natural gas, sewer, fiber, site access and land remediation at industrial parks, airparks, and ports in counties not receiving funding from the Pandemic Relief Primary Source Revolving Fund or Pandemic Relief Secondary Source Revolving Fund, provided that the Oklahoma Department of Commerce distributes such funds evenly amongst the congressional districts of the state to provide statewide economic impact.

Fund Allocation and Usage

Awards received through this program are intended to install industrial infrastructure into sites designated by the Legislature.

Projects using **ARPA** funds may be water, sewer, or broadband infrastructure projects and must comply with the guidelines of *31 CFR Part 35 RIN 1505-AC77* and the Treasury's Final Rule, according to the Grant Agreement between ODOC/CD and the Oklahoma Office of Management & Enterprise Services (OMES), and all federal rules and regulations.

Ineligible ARPA projects are those that do not comply with *31 CFR Part 35 RIN 1505-AC77*.

Projects using **PREP** funds must create economic development infrastructure design, development, and construction that support sites or surrounding communities.

Ineligible PREP projects are submittals that the ODOC/CD deems do not create a feasible marketable site in compliance with the legislative funding's intent.

FUNDS IMPERMISSIBLY USED SHALL BE REPAYED BY THE COMMUNITY TO THE STATE WITHIN THIRTY (30) DAYS OF A WRITTEN REQUEST FOR REPAYMENT TRANSMITTED TO THE COMMUNITY BY THE STATE.

Project Grant Management Partnership

- Project objectives, scope, deliverables, and timelines.
- Approved budget and funding allocation.
- Roles and responsibilities for all involved parties (e.g., ODOC/CD Community Development Team, EDA, Engineering Project Management, and Construction Team).
- Key milestones and performance targets.

Microsoft Teams



Environmental Review / Release of Funds

Request for Release of Funds / Environmental Review (ARPA Specific)

NEPA requirements do not apply to the Treasury's administration of SLFRF funds under the following eligible use categories:

- Revenue Loss
- Public Health
- Negative Economic Impacts
- Water
- Sewer
- Broadband Infrastructure
- Emergency Relief from Natural Disasters

Note: Environmental review requirements are governed by the National Environmental Policy Act (42 U.S.C. §§ 4321 et seq.) and all applicable implementing regulations.

Request for Release of Funds / Environmental Review

ARPA and PREP projects may still be subject to NEPA review if they are also funded by other federal financial assistance programs or have certain federal licensing or registration requirements. **In these instances, ODOC will require the subrecipient to provide approval documentation from the federal entity.**



Note: Environmental review requirements are governed by the National Environmental Policy Act (42 U.S.C. §§ 4321 et seq.) and all applicable implementing regulations.

Procurement



Request for Release of Funds / Procurement

ODOC/CD must ensure adherence to all applicable local, State, and federal procurement laws and regulations. It's important to understand that when federal funds are involved in construction projects in Oklahoma, there's a blend of federal and state regulations that come into play.

Subrecipients are responsible for complying with all requirements of any federal grant award, including purchases with federal grant funds. The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for federal awards can be found at 2 CFR, Part 200. Subrecipients should review these regulations and review any award-specific legislation or publications for additional required contractual provisions.

In addition, subrecipients should include the Federal Funding Terms in their contract language as applicable. This information can be found in Attachment D of the ARPA and PREP Fund Oversight and Monitoring Manual.

Note: All subrecipients must comply with 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards). Procurement must comply with 2 CFR 200.317 through 200.327.

Request for Release of Funds / Procurement Cont.

Oklahoma Public Competitive Bidding Act

This act sets out the rules for competitive bidding on public construction projects within Oklahoma. When state funds are involved, this act will apply. More information on the Oklahoma Public Competitive Bidding Act can be located here

<https://www.sai.ok.gov/Search%20FormsPubs/database/PCBA%20Handout%20Updated%209.7.22%20cw.pdf>

Interaction of Federal and State Regulations:

When federal funds are present (i.e., ARPA), ODOC/CD and each subrecipient must carefully navigate the interplay between federal and state regulations. This often means ensuring that the procurement process meets the most stringent requirements of both sets of rules.

Note: All subrecipients must comply with 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards). Procurement must comply with 2 CFR 200.317 through 200.327

Oklahoma Department of Commerce (ODOC) – ARPA and PREP Request for Release of Funds & Removal of Contract Conditions Checklist

Please complete the Release of Funds Checklist below and upload applicable items with supporting documentation to OKGrants. Instructions can be located here <https://www.okcommerce.gov/community-development/local-governments-erdos/okgrants-guides-logon/>.

Important Note: Funds will not be released until the environmental clearance has been approved by ODOC.

Debarment and Suspension Certification

- Sam.gov Verification (upload PDF showing no exclusion)

Environmental Review Records

- NEPA documents (e.g., Categorical Exclusion)
- ODEQ Water Quality Certification
- Environmental Clearance Forms

Procurement and Contracting

- Bid Advertisement and Tabulations
- Sole Source Justification (if applicable)

Project Planning and Design

- Approved Engineering Plans and Specifications
- Preliminary Engineering Report (PER)

Permitting Applications and Approvals

- ODEQ Construction Permit
- OWRB Water Use Permit (if applicable)
- Utility Crossing or Encroachment Permit (if applicable)

Construction Oversight (Construction Projects Only)

- Bid Bonds, Performance, Bonds, Payment Bonds
- Executed Construction Contract
- Notice of Award Documents
- Notice to Proceed

Preparer Name and Title

Date:

ODOC Reviewer

Date:

Compliance Requirements for Procurement

To ensure compliance with procurement requirements, subrecipients will be required to upload backup documentation in OGX in the Release of Funds section. At a minimum, backup documentation should include:

- Bid advertisement
- Bid tabulation
- Bid proposal
- Notice of Award
- Notice to Proceed
- Executed Contract to include federal provision as applicable
- Debarment and Suspension Certification (Sam.gov)
- Sole Source Justification (if applicable)

Note: All subrecipients must comply with 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards). Procurement must comply with 2 CFR 200.317 through 200.327.

ARPA Federal and State Regulation

ARPA

- ARPA-funded projects in Oklahoma will need to comply with both federal procurement rules and the Oklahoma Public Competitive Bidding Act.
- For ARPA-Federally funded projects, i.e., ARPA Infrastructure; the Uniform Guidance established in 2 CFR 200.319 applies that all procurement transactions for property
- Recipients must have and use documented procurement procedures that are consistent with the standards outlined in 2 CFR 200.317 through 2 CFR 200.320.
- Projects must often adhere to both federal and state regulations, creating a layered compliance environment.

State

- For State funded projects such as PREP, (i.e., State funded PREP grants) the Public Competitive Bidding Act of 1974 Title 61 O.S. §§ 101 – 138 is applicable:
- Applies to any public construction.
- Applies to road-construction projects.
- Applies to any repairs or construction of public buildings.

Financial Management



Financial Management / Advance Request in OGX

Reimbursement Requirements

Sub-recipients should be aware that this is a cost reimbursement agreement (subject to receipt of supporting documentation).

Supporting Documentation includes, but is not limited to

- Signed Purchase Order
- Invoice or Application for Payment
- Construction or Engineering Contract as applicable

OGX is the official grant management system for payment reimbursement. The process walk-through is available on the [OGX website](#).

Note: Financial management systems must comply with 2 CFR Part 200.302.

Financial Management / Monthly Expenditure Report in OGX

ODOC/CD is focused on ensuring that all expenditure reports are current to avoid the presumption or appearance of cash on hand. ODOC requires Subrecipients to submit monthly accrued expenditure reports within 30 days after the last day of the reporting month.

Important Note: Based on the contracted end date of all ARPA contracts, funds must be expended by June 30, 2026, to ensure no issues with reimbursement from OMES.

Note: Financial management systems must comply with 2 CFR Part 200.302.

Cash Expenditure Reporting and Drawdown Requests

Treasury has interpreted "costs incurred" to be equivalent to an obligation:

Obligated: funds are legally committed to specific projects.

- A cost shall be considered to have been incurred if the recipient has incurred an obligation with respect to such a cost by December 31, 2024.
- Obligated funds not expended by December 31, 2026, must be returned to the Treasury.
- ODOC has informed our Legislative contact that we intend to maintain the June 30, 2026, contract end date to ensure that all projects are complete and costs incurred are drawn and paid in advance of the funding stream end date.
- Extending to the December 31, 2026, SLFRF funding end date creates risks such as loss of funding, repayment to Treasury, and Audit Findings

Setting a June 30, 2026, contract deadline ensures:

- Sufficient time to complete construction...
- Time for invoicing, review, and payment processing.
- Compliance with audit, close-out, and reporting requirements.
- Avoidance of rushed payments or disallowed costs.

Note: Financial management systems must comply with 2 CFR Part 200.302.

Financial Management / Contract and Budget Modification

In some cases, a budget or contract modification may be necessary due to barriers or unforeseen circumstances impacting the schedule, cost, or scope of the project.

For contract modification, ODOC/CD will review supporting documents and reasons for requesting a modification.

Note: Financial management systems must comply with 2 CFR Part 200.302.

Contract Development



Contract Development

Once necessary services have been properly procured, it is time to develop the legal instruments necessary to establish contractual obligations and rights. This Policy provides general guidance concerning the compliance aspects of contract administration. As with all contractual obligations, the subrecipient is advised to seek legal counsel regarding rights, duties, obligations, and liabilities arising from these legal arrangements.

The following items should be included in the contract text at a minimum:

- Parties to the agreement.
- Project location.
- Scope of services.
- Financial commitments.
- Starting and ending dates.
- Performance schedule and milestones.
- Contract representatives:
- Subrecipient
- Construction contractor.
- Subcontractor(s).
- Conflict of interest.
- Reporting requirements.
- Suspension clause.
- Termination clause
- Incorporation of attached requirements
- Federal provisions as applicable
- Signatures.

Labor Standards Applicability

Labor Standards Applicability

Davis-Bacon Act

- The Davis-Bacon Act will apply to all ARPA projects over \$10 million.
- If an ARPA project is over the \$10 million threshold, the following requirements will apply:
- Subrecipients will provide ODOC/CD a Davis Bacon Payroll Compliance Certification

ARPA Water and Sewer: Other
DAVIS-BACON PAYROLL COMPLIANCE CERTIFICATION
(To be completed by the Contractor and submitted with each pay request.)

Drinking Water System: _____
ODOC Contract Number: _____
Contract Name: _____
Contractor Name: _____
Reporting Period: _____

Confirm that project is in compliance with Davis-Bacon requirements:

- 1. Contractor has collected payroll records and signed certifications of Davis-Bacon Compliance for all laborers/mechanics for all weeks of construction for the above listed Contractor.
- 2. Payroll records indicate that employees are paid weekly.
- 3. **Contractor** has documentation that wage interviews were conducted. Copies of SF-1445 have been provided to ODOC.
 - a. 1st Interview Date of Interview: _____
 - b. 2nd Interview Date of Interview: _____
- 4. Davis-Bacon wage posters are posted at the construction site in a conspicuous place protected from the weather in all relevant languages:
 - a. Employee Rights (WH-1321);
 - b. OSHA Whistleblower Fact Sheet;
- 5. Applicable Davis-Bacon wage rate determinations are posted at the construction site.

Monitoring

Oversight and Review Plan

Oversight and Review Plan

Oversight and Review Plan

Oklahoma's approach to Program and Fiscal oversight of each subrecipient utilizes a combination of intensive desktop monitoring, on-site monitoring, and investigative monitoring, as deemed necessary, to determine compliance, as prescribed by statute.

Oklahoma Department of Commerce (ODOC/CD) will utilize, at a minimum, at its discretion, the following methods to conduct monitoring oversight of subrecipients:

- Risk assessments (tool)
- Desk reviews (e.g., tools)
- Random sampling
- On-site visits

ODOC/CD is not restricted to using the items above and may incorporate other methods as determined necessary.

Note: Subrecipient monitoring shall be conducted in accordance with 2 CFR Part 200.332

Monitoring

- Subrecipients and organizations will be notified by email prior to the monitoring date.
- A monitoring tool will be attached to the notification letter and the subrecipient will be required to respond with all required documentation by a certain date.
- All required documents will be uploaded to OGX for desk monitoring.

Monitoring and Risk Assessment

- ODOC/CD's strategic approach includes contingency strategies for modifying the grant as needed or providing technical assistance to evade identified risks, as well as regular updates as new risks emerge.
- Timeliness (e.g., milestones met on time or determined through communication with subrecipients and progress reporting on a monthly and quarterly basis).
- Funding/Budget vs. Expenditures
- Community impact (e.g., anticipated jobs created, forecasting setbacks due to Right of Way negotiations with landowners, or environmental impacts).

Monitoring Process

Onsite Monitoring

- If necessary, an on-site monitoring visit will be scheduled in advance. The chief executive officer of the State's Subrecipient and the project administrator will be notified of the date, time, location, and purpose of the visit. Upon arrival, the ODOC/CD Representative will conduct an entrance interview, reiterating the purpose of the visit and outlining the necessary files and documentation. Utilizing appropriate checklists, the Representative reviews the State's Subrecipient files to determine if all requirements have been met.
- At the conclusion of the visit, the ODOC/CD Representative will conduct an exit interview and provide a tentative summary of the visit's results. If problems appear, the State's Subrecipient has an opportunity to provide more information or clarification.

Desk Monitoring

- ODOC/CD prioritizes this form of monitoring as a means of staying in touch with project progress and preventing problems early, thereby avoiding costly problems left unattended too long. This monitoring method is the most efficient and cost-effective way.
- ODOC/CD can employ to meet a portion of its oversight responsibilities. The ARPA and PREP Programs will require increased desk monitoring, which may include submitting additional backup documentation for pay requests and expenditure reports.
- ODOC/CD may also include data visualization tools (graphs, pie charts on PowerPoint or Excel for tracking of cash drawn and/or expenditures and project outcomes), for an at-a-glance understanding of project status as needed.

Recordkeeping Requirement

Subrecipients shall maintain and retain its financial records, supporting documents, statistical records, and all other records pertinent to this Subaward for seven (7) years from the date of submission of the Final Expenditures Report, and longer if any litigation, claims, or audit is started before the end of that seven (7) year period; in which case, records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action has been taken.

Failure to abide by any reporting requirement shall require the applicant to repay ARPA or PREP funds to the State of Oklahoma within thirty (30) days of a written request for repayment.

Monitoring Red Flags



Monitoring Red Flags

Below are additional ARPA and PREP grant monitoring issues that are potential issues at the subrecipient level:

Scenario:

Drifting away from the scope of the grant, and it does not align with the original proposal.
Unapproved scope changes can = questioned costs.

Monitoring Red Flags:

Invoices that don't clearly map to the approved scope.
Engineering revisions without written approval.

Procurement & Contracting Noncompliance

Common Errors:

Engineering or construction started before contract execution.

Missing:

- Federal Terms and Conditions
- Non-collusion affidavits
- Debarment certifications
- Bonding documentation
- No evidence of competitive procurement



Monitoring Red Flags Cont.

Scenario:

Contract amendment requests increasing cost/scope without justification.
Can result in the entire contract being disallowed.

Monitoring Red Flag

Contracts dated after work began.
Change orders that function like sole-source awards.
Construction begins with no documentation of ODEQ Approval of the Design.

Common Errors:

Construction begins before NEPA clearance if applicable (does not apply to the ARPA Federal Funding, but does apply to other federally funded leverage).

Easement changes are not re-evaluated environmentally.

Environmental noncompliance = automatic finding.

Monitoring Red Flags Cont.

Monitoring Red Flag:

Early invoices dated before clearance letters.

Administrative costs charged without justification.

Invoices Omissions- lacking a description of cost/ no detailed descriptions.

Missing:

- Labor breakdowns
- Dates of service
- Lump-sum invoices with no backup

Why is it an issue? Costs must be;

- ✓ Necessary
- ✓ Reasonable
- ✓ Allocable
- ✓ Allowable



Monitoring Red Flags Cont.

Monitoring Red Flag:

Professional services invoices– monthly, with no detail.

Invoices that look identical month-to-month (copy and paste).

Schedule Delays & Period-of-Performance Risk are especially critical post-2025 for ARPA.

The project is behind schedule with no recovery plan.

Funds obligated but not realistically expendable by the deadline.

Construction delays are tied to:

Easements

Utility conflicts

Permitting

Why it matters:

ARPA expenditures deadline is approaching. We are in the final year.

PREP projects are being questioned at the legislative level as we speak.

Late projects risk de-obligation.

High unspent balances late in the grant term are subject to de-obligation.

Monitoring Red Flags Cont.

PREP and ARPA:

- Expenditure reports don't match cash draws.
- Subrecipient financial records.
- Performance measures are not updated.
- Outputs overstated.

Why it matters:

- Projects are being questioned at the legislative level.
- Reports are used to illustrate performance outcomes.
- Projections may impact de-obligation decisions.



Closeout



Closeout

ARPA and PREP Closeout Checklist

The Subrecipient shall submit closeout documents no later than sixty (60) days after the final date of the period funded or upon completion of the project. In the event the project is not complete at the end of the contract period, no final payment will be made, and ODOC/CD may require that the Subrecipient repay in full the contracted amount if the project is not complete.

The following documents will be required to be submitted with the closeout.

- Certificate of Substantial Completion/Final Completion
- Punch List and Resolution Log
- Final Inspection Report (from engineer and/or DEQ)
- Photographs of the project (before and after)

Subrecipients will be required to submit with their closeout, the ARPA/PREP Closeout Checklist

Subrecipient: ARPA/PREP Contract No.:	Submitted	ODOC Review
1. FINAL EXPENDITURE REPORT <small>Completed and submitted in OKGrants prior to closeout.</small>	<input type="checkbox"/>	<input type="checkbox"/>
2. Certificate of Substantial Completion/Final Completion	<input type="checkbox"/>	<input type="checkbox"/>
3. Punch List and Resolution Log	<input type="checkbox"/>	<input type="checkbox"/>
4. Final Wage Compliance Report (Construction Only if applicable) <small>Completed and executed by the Authorized Official.</small>	<input type="checkbox"/>	<input type="checkbox"/>
5. Proof of Insurance <small>Only needed for above-ground facilities built or renovated and/or equipment purchased with the assistance of ARPA/PREP funds.</small>	<input type="checkbox"/>	<input type="checkbox"/>
6. Final Inspection Report (from engineer and/or DEQ)	<input type="checkbox"/>	<input type="checkbox"/>
7. Board Minutes or Resolution <small><u>Board Minutes</u> to acknowledge that the project is completed and that all final costs have been incurred or obligated to make final payment to the contractor/s.</small> <small><u>Resolution</u> to acknowledge that the project is complete and that all final costs have been incurred or obligated to make final payment to the contractor/s.</small>	<input type="checkbox"/>	<input type="checkbox"/>
8. Project Photos (If applicable) <small>Complete and upload to OKGrants. Photos may include before, during, and after photos of the project/s.</small>	<input type="checkbox"/>	<input type="checkbox"/>

Authorized Official Signature

Printed Name and Title

Date

ODOC Reviewer

Printed Name and Title

Date

Rev. July 2025

Reporting Requirements



PREP Project Status Reporting to Oklahoma Senate

Upon request, we frequently meet with the Senate Liaison to provide the following information:

- Current Status
- Completion Percentage
- Milestones & Hurdles
- Expenditure Ratio

More Frequent Reporting to Joint Committee on a Monthly Basis (ARPA)

The Joint Committee on Pandemic Relief Funding (JCPRF) requires an update on project status. These updates are now provided to the JCPRF on a monthly basis to provide information on progress and impacts of investments.

Quarterly Reporting to JCPRF shifted to monthly reporting as of October 2025

Program Manager Agency:

List of Projects: (if available, please include the following information for each project)

- Project Number:
- Project Title:
- Project Amount:
- Total amount expended:
- **Obstacles / Challenges to Success:**
- **Upcoming media or public relations opportunities:** (Examples include: ribbon cuttings, tours, major announcements or milestones, success stories)
- **Other Information to share with the JCPF members?**
- **Budget Forecast Template:** (attached)

Common Issues or Findings

Common Issues or Findings

The following common issues and findings affect **payments**, including delays, denials, and, in some cases, a notice of non-compliance.

- Submission of documentation for reimbursement without supporting documents, such as invoices that align with cash requests.
- No evidence of competitive procurement of professional services provided through a proof of public announcement.
- Contract (ARPA) missing required federal provisions.
- Construction proceeding without ODEQ Approval, provided to ODOC.

Common Issues or Findings Continued

- Engineering revisions
- Scope changes without ODOC approval
- Lack of invoice details
- No contingency plans to expedite spending
- Schedule delays (e.g., easements)
- Delay in submitting reporting data
- Inconsistency in communication

Questions?



Resources

- ✦ Department of Treasury 31 CFR Part 35; Pandemic Relief Programs
- ✦ State and Local Fiscal Recovery Funds Federal (SLFRF) FAQs
- ✦ 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (ARPA)
- ✦ Progressing Rural Economic Prosperity Fund created in Enrolled House Bill No. 4456 (PREP)
- ✦ 24 CFR, Part 85.36 (Federal Procurement Standards), which outlines requirements for competitive bidding, procurement procedures, and vendor selection.
- ✦ Public Competitive Bidding Act of 1974 & 61 O.S. §§ 101, et seq.
- ✦ ARPA and PREP Fund Oversight and Monitoring Manual

