

# Bloomberg Federal Assistance e311 Content Workshop: ARP and Vulnerable Populations

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May 25, 2022

# COVID e311 Federal Assistance Content Workshop Experts

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# Overview

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*ARP Opportunity Presents Challenges*

*Definitions and References in the Final Rule*

*Public Programs Cited in the Final Rule*

*Public Data Sources to Meet Treasury Requirements*

*Constructing an Equitable Framework/Rubric*

*Metrics and Outputs for Reporting and Transparency*

*Benefits of Using Data-Driven Selection Tools*

# Opportunity Presents Challenges

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- Flexibility of funding can make an equitable and objective selection of projects difficult with the wide range of activity eligibility
- Project criteria must be defined by the community leaders, who want to remain impartial while having the best understanding of local problems
- Establishing compliance with ARP goals is important to avoid audit findings and potential return of funds
- Overwhelming asks or needs of the community can be presented by competing organizations that all benefit your community

# Definitions and References in the Final Rule

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- *ARP Eligible Use*: Alleviate the negative public health and economic impacts of the COVID-19 public health emergency on communities

*Communities defined as impacted and disproportionately impacted are presumed to have experienced negative public health and economic impacts of the pandemic, and are therefore eligible for CSLFRF assistance without need for further eligibility analysis*

- *Treasury Final Rule*: Identifies populations negatively impacted or disproportionately impacted by the pandemic

*“In other words, the interim final rule identified disproportionately impacted populations by assessing the impacts of the pandemic and finding that some populations experienced meaningfully more severe impacts than the general public.”*

- *Takeaway*: Using categories that fall within Treasury’s impacted or disproportionately impacted definition allows recipients to respond to a broad set of households and entities without further analysis

# Public Programs Cited in the Final Rule<sup>(4)</sup>

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## Impacted Households

- Children's Health Insurance Program (CHIP)
- Childcare Subsidies through the Child Care and Development Fund (CCDF) Program
- Medicaid
- National Housing Trust Fund (HTF), for affordable housing programs only
- Home Investment Partnerships Program (HOME), for affordable housing programs only

# Public Programs Cited in the Final Rule<sup>(4)</sup>

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## Disproportionately Impacted Households

- Temporary Assistance for Needy Families (TANF)
- Supplemental Nutrition Assistance Program (SNAP)
- Free and Reduced-Price Lunch (NSLP) and/or School Breakfast (SBP) programs
- Medicare Part D Low-Income Subsidies
- Supplemental Security Income (SSI)
- Head Start and/or Early Head Start
- Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)
- Section 8 Vouchers
- Low-Income Home Energy Assistance Program (LIHEAP)
- Pell Grants
- For services to address educational disparities, Treasury will recognize Title I eligible schools as disproportionately impacted and responsive services that support the school generally or support the whole school as eligible

# Public Data Sources to Meet Treasury Requirements

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## Databases for Framework

- Center for Disease Control (CDC)
- Census Bureau
- US Department of Agriculture (USDA)
- Integrated Public Use Microdata Series (IPUMS)
- NOAA
- Feeding America
  
- Federal Bureau of Investigation (FBI) Uniform Crime Report (UCR)

\*PolicyMap

\* FEMA's National Risk Index (hazard selections)

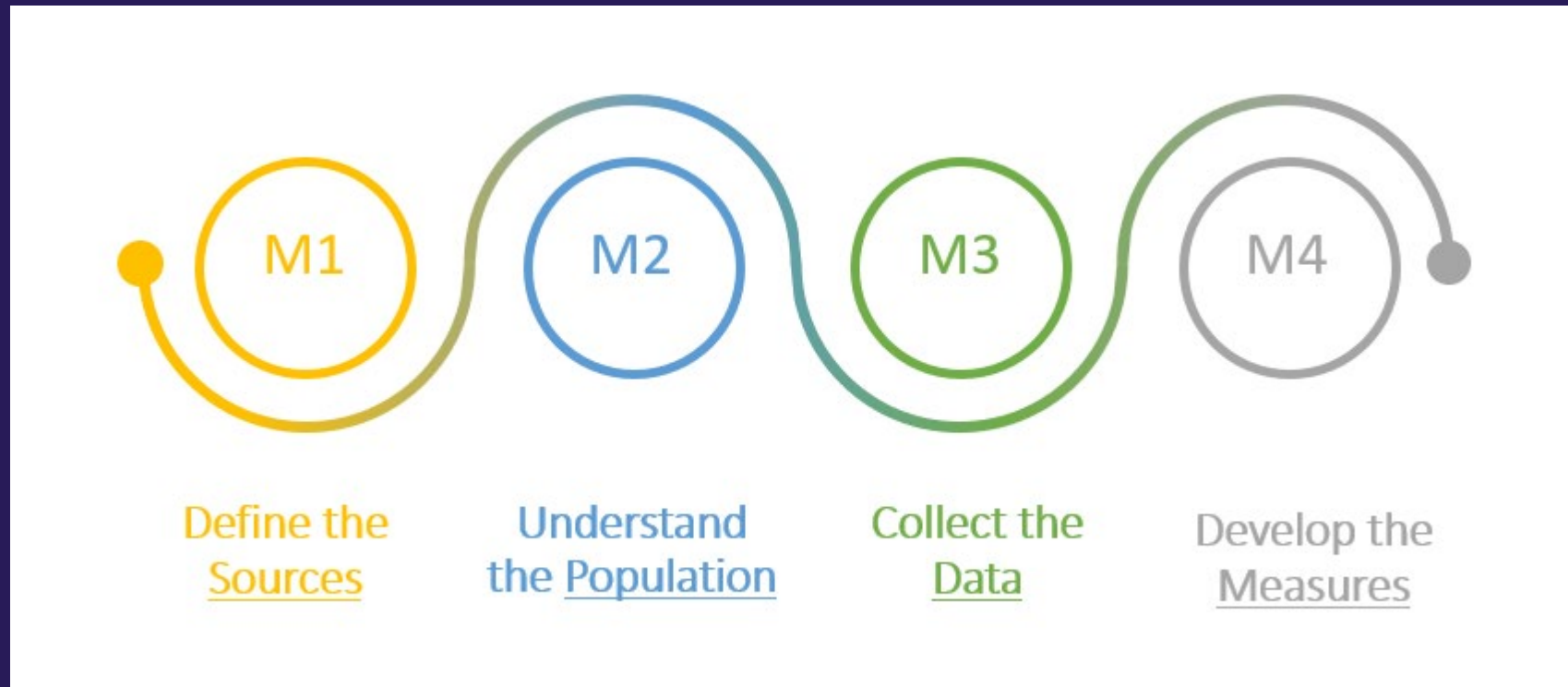
\* Justice40 Climate Tool (beta test)



# Constructing an Equitable Framework or Rubric

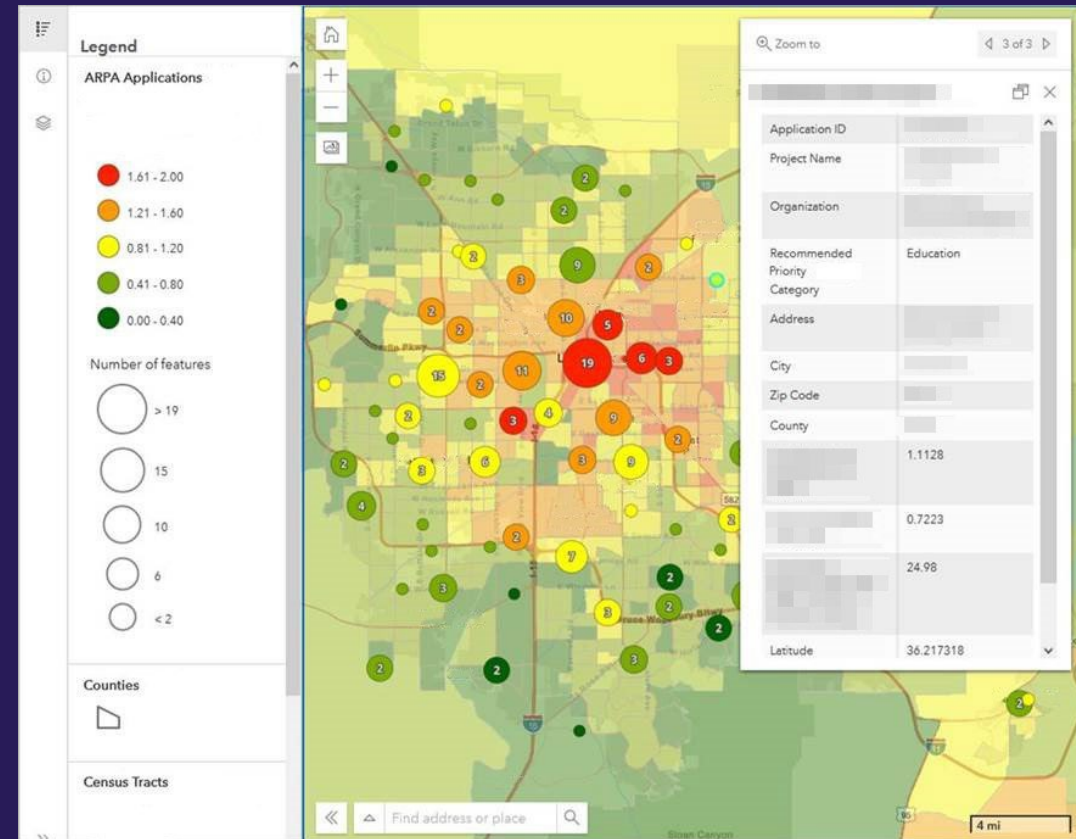
*Data Driven – Bias Reduction – Statistically Normalized*

## *Equity Evaluation Milestones*



# Metrics and Outputs for Reporting and Transparency

ID	Interim Rule Eligibility	Final Rule Eligibility	Tier	TREASURY EXPENDITURE CATEGORIES (EC)	Recommended Treasury Criteria
1	Eligible	Final Rule Eligible	I	1.10 Mental Health Serv	1.10 Mental Health Servi
2	Eligible	Other Funding		1.11 Substance Use Serv	1.11 Substance Use Servi
3	Needs More Research	Other Funding		3.3Education Assistance:	Outside Phase Priority
4	Eligible	Final Rule Eligible		2.10 Aid to Nonprofit Or	2.1 Household Assistance
5	Eligible	Final Rule Eligible		2.1Household Assistance:	2.1 Household Assistance
6	Duplicate	Duplicate		1.1COVID-19 Vaccination	1.1 COVID-19 Vaccinatio
7	Eligible	Final Rule Eligible		2.5Household Assistance:	2.5 Household Assistance
8	Eligible	Final Rule Eligible		2.1Household Assistance:	2.1 Household Assistance
9	Eligible	Other Funding	I	2.10 Aid to Nonprofit Or	2.11 Aid to Tourism, Trav
10	Eligible	Final Rule Eligible	I	3.2Education Assistance:	1.10 Mental Health Servi
11	Needs More Research	Possible Ineligible		2.10 Aid to Nonprofit Or	1.7 Capital Investments c
12	Needs More Research	Other Funding		3.3Education Assistance:	Outside Phase Priority
13	Eligible	Final Rule Eligible		3.3Education Assistance:	3.3 Education Assistance
14	Duplicate	Duplicate		2.2Household Assistance:	2.2 Household Assistance
15	Duplicate	Duplicate		3.3Education Assistance:	1.5 Personal Protective E
16	Eligible	Final Rule Eligible		3.3Education Assistance:	3.4 Education Assistance
17	Eligible	Final Rule Eligible		1.8Other COVID-19 Publi	1.8 Other COVID-19 Publi



# Benefits of Using Data-Driven Selection Tools

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- Open-source data is collected by impartial third parties, which removes bias when ranking project impact areas by census tracts
- Outcomes and reports must be relevant to disproportionately impacted and impacted vulnerable populations, so it is best to include features (data variables or different fields of information) before project selection
- Transparency and visualization end points being considered in the beginning of the process – graphs, maps, and dashboards as potential ways to show inclusivity/span of geographic impact – are done before applications for grant awards to ensure you have the right information

# Questions?

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