

## Prioritized ARPA Activities

ARPA funds will be used to address the economic impacts of the crisis on the hardest-hit communities, populations, and households. Providers must document that program participants have been negatively impacted by the COVID-19 public health emergency and fall within one of the eligible beneficiary groups included in [Attachment C: ARPA Eligible Beneficiaries](#). Verification documentation will be determined during contract negotiations depending on the type of program/beneficiary. Financial impact has to have occurred after the start of the pandemic in March 2020 or after.

As a result of a series of ARPA community engagement efforts including virtual Town Halls, Community Surveys, and convening an ARPA Equity Workgroup, the Sonoma County Board of Supervisors has prioritized the funding of specific ARPA-eligible activities for the County that address the negative economic impacts and the disparities in public health outcomes as a result of the pandemic. The activities listed below includes the ARPA-eligible activities that align with the Board's priorities.

***Please note that not all activities named in the Final Rule will be prioritized for funding in Sonoma County. As such, they have not been included in this description.***

Please see [Attachment C: ARPA Eligible Beneficiaries](#) for details on service eligibility.

## I. Households and Communities

### A. Assistance to Households/Basic Needs

1. **Impacted** Households are eligible for the following activities/services:

- Food assistance
- Emergency assistance for pressing needs: burials, home repairs, weatherization, or other needs
- Financial Assistance, including childcare subsidies; Universal Basic Income; and additional financial supports as needed
- Survivor's benefits, including survivor's benefits to surviving family members of individuals who have died from COVID-19, including cash assistance to widows, widowers, or dependents

### B. Childcare and Childcare Facilities

1. **Impacted** Households and Communities are eligible for the following activities/services:

- Promoting healthy childhood environments: Childcare and Early Learning
  - new or expanded services, increasing access to services, efforts to bolster, support, or preserve existing providers and services, and similar activities
  - improvements to or new construction of childcare, daycare, and early learning facilities
- Assistance to Workers [in the childcare field]
  - services like job training to accelerate rehiring of unemployed workers
  - combined education and on-the-job training programs, or job training to accelerate rehiring

2. **Disproportionately** Impacted Households and Communities are eligible for all activities/services listed above, as well as:

- Building strong, healthy communities through investments in neighborhoods
  - *Vacant or abandoned properties* [for development of new childcare facilities]<sup>1</sup>

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<sup>1</sup>Certain services for vacant or abandoned properties are eligible to address negative economic impacts of the pandemic on disproportionately impacted households or communities. Eligible activities include: Rehabilitation, renovation, maintenance, or costs to secure vacant or abandoned properties to reduce their negative impact; Costs associated with acquiring and securing legal title of vacant or abandoned properties and other costs to position the property for current or future productive use; Removal and remediation of environmental contaminants or hazards from vacant or abandoned properties, when conducted in compliance with applicable environmental laws or regulations; Inspection fees and other administrative costs incurred to ensure compliance with applicable environmental laws and regulations for demolition, or other remediation activities.

### C. Educational Disparities

1. **Impacted** Households and Communities are eligible for the following activities/services:
  - Internet access or digital literacy assistance [for students]<sup>2</sup>
  - Addressing the impacts of lost instructional time<sup>3</sup>
    - high-quality tutoring and other extended learning opportunities, providing differentiated instruction, implementing activities to meet the comprehensive needs of students, expanding and improving language access for parents and families, providing information and assistance to parents and families on how they can effectively support students, including in a distance learning environment, improving student engagement in distance education, and administering and using high-quality assessments to assess students' academic progress, among others. In designing services under this eligible use, sub-recipients may wish to reference guidance from the Department of Education on strategies for addressing lost instructional time.
2. **Disproportionately** Impacted<sup>4</sup> Households and Communities are eligible for all activities/services listed above, as well as:
  - Addressing educational disparities exacerbated by COVID-19, including but not limited to: increasing resources for high-poverty school districts, educational services like tutoring or afterschool programs, summer education and enrichment programs, and supports for students' social, emotional, and mental health needs<sup>5</sup>.
  - Equitable and adequate school funding; access to a well-rounded education; well-prepared, effective, and diverse educators and staff; and integrated support services.

### D. Community Health Workers & Public Benefits Navigators

1. **Impacted** Households are eligible for the following activities/services:
  - Assistance accessing or applying for public benefits or services
    - public benefits navigators, like Promotores, to assist community members with navigating and applying for available federal, state, and local public

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<sup>2</sup> Can include a wide range of programs and services to expand internet access and digital literacy, such as subsidies for the cost of internet service, other programs that support adoption of internet service where available, digital literacy programs, or programs that provide devices and equipment to access the internet (e.g., programs that provide equipment like tablets, computers, or routers) to households

<sup>3</sup> When providing services to address lost instructional time, *recipients may presume that any K-12 student who lost access to in-person instruction for a significant period of time has been impacted by the pandemic and is thus eligible for responsive services*

<sup>4</sup> See Attachment C – ARPA Eligible Beneficiaries for Title 1 School eligibility

<sup>5</sup> When providing behavioral health services, recipients may presume that the general public was impacted by the pandemic and provide behavioral health services to members of the general public, *including children and youth in school*

benefits or services.

- outreach efforts to increase uptake of the Child Tax Credit.
- programs or services to increase awareness and uptake of assistance programs

2. **Disproportionately** Impacted Households are eligible for all activities/services listed above, as well as:

- Addressing health disparities
  - Community health workers and public benefits navigators, like Promotores

## E. Housing and Shelter

1. **Impacted** Households are eligible for the following activities/services:

- Emergency housing assistance, including:
  - housing stability services that enable eligible households to maintain or obtain housing, including counseling and legal aid
  - rent, rental arrears, utility costs or arrears reasonable accrued late fees, mortgage payment assistance, financial assistance to allow a homeowner to reinstate a mortgage or to pay other housing-related costs related to a period of forbearance, delinquency, or default, mortgage principal reduction, facilitating mortgage interest rate reductions, counseling to prevent foreclosure or displacement, relocation expenses following eviction or foreclosure
  - assistance to households for delinquent property taxes, for example to prevent tax foreclosures on homes
  - direct or bulk payments to utility providers to facilitate utility assistance to multiple consumers at once, so long as the payments offset customer balances and therefore provide assistance to households
  - emergency assistance for individuals experiencing homelessness, either individual-level assistance or assistance for groups of individuals
  - transitional shelters
- Promoting long-term housing security: affordable housing and homelessness

2. **Disproportionately** Impacted Households are eligible for all activities/services listed above, as well as:

- Housing vouchers and assistance relocating
  - housing vouchers, residential counseling, or housing navigation assistance to facilitate household moves to neighborhoods with high levels of economic opportunity and mobility for low-income residents
- Building strong, healthy communities through investments in neighborhoods
  - Vacant or abandoned properties [for development of housing]<sup>6</sup>

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<sup>6</sup> Certain services for vacant or abandoned properties are eligible to address negative economic impacts of the pandemic on disproportionately impacted households or communities. Eligible activities include:

**F. Mental Health<sup>7</sup> Services**

- Respond to increased rates of behavioral health challenges at a population or individual level
- Respond to new behavioral health challenges or exacerbation of pre-existing challenges, including new barriers to accessing treatment
- Services across the continuum of care
- Services for special populations
- Programs or services to support equitable access to services and reduce racial, ethnic, or socioeconomic disparities in access to high-quality treatment.
- Funds may be used to respond to opioid use disorder and prevent overdose mortality
- Behavioral health facilities and equipment

**G. Assistance to Workers**

- Job training or other types of assistance to individuals that are currently employed but are seeking to move to a job that provides better opportunities for economic advancement, such as higher wages or more opportunities for career advancement.
1. ***Unemployed and Underemployed Workers*** are eligible for activities/services listed above, as well as:
    - Services like job training to accelerate rehiring of unemployed workers
    - Other efforts to accelerate rehiring and thus reduce unemployment, such as childcare assistance, assistance with transportation to and from a jobsite or interview, and incentives for newly employed workers, as well as assistance to unemployed workers seeking to start small businesses.
    - Public jobs programs, subsidized employment, combined education and on-the-job training programs, or job training to accelerate rehiring or address negative economic or public health impacts experienced due to a worker's occupation or level of training.
    - Combined education and on-the-job training programs, or job training to accelerate rehiring.

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Rehabilitation, renovation, maintenance, or costs to secure vacant or abandoned properties to reduce their negative impact; Costs associated with acquiring and securing legal title of vacant or abandoned properties and other costs to position the property for current or future productive use; Removal and remediation of environmental contaminants or hazards from vacant or abandoned properties, when conducted in compliance with applicable environmental laws or regulations; Inspection fees and other administrative costs incurred to ensure compliance with applicable environmental laws and regulations for demolition, or other remediation activities.

<sup>7</sup> Impacted population is identified as the general public

## II. Small Businesses & Nonprofits

### 1. **Impacted** Small Businesses are eligible for the following activities/services:

- Grants to mitigate financial hardship such as declines in revenues or impacts of periods of business closure, for example by supporting payroll and benefits costs, costs to retain employees, mortgage, rent, or utilities costs, and other operating costs.
- Grants, or in-kind assistance to implement COVID-19 prevention or mitigation tactics.
- Technical assistance, counseling, or other services to assist with business planning needs.
- Identify and respond to a negative economic impact of COVID-19 on new small business startups or microbusinesses; for example, if small business startups or microbusinesses in a locality faced greater difficulty accessing credit than prior to the pandemic or faced increased costs to starting the business due to the pandemic or if particular small businesses or microbusinesses had lost expected startup capital due to the pandemic.
- Provide job training for unemployed individuals. Support small business startups, microbusinesses, and individuals seeking to start small or microbusinesses.

### 2. **Disproportionately** Impacted Small Businesses are eligible for all activities/services listed above, as well as:

- Certain capital investments, such as rehabilitation of commercial properties, storefront improvements, and façade improvements. Sub-recipients may also provide disproportionately impacted microbusinesses additional support to operate the business, including financial, childcare, and transportation supports.
- Technical assistance, business incubators, and grants for start-ups or expansion costs for disproportionately impacted small businesses. Note that some of these types of assistance are similar to those eligible to respond to small businesses that experienced a negative economic impact (“impacted” small businesses). However, because some small businesses were disproportionately impacted, these eligible uses can be provided to those businesses without any specific assessment of whether they individually experienced negative economic impacts or disproportionate impacts due to the pandemic.
- Building strong, healthy communities through investments in neighborhoods
  - Vacant or abandoned properties [for development of new business]<sup>8</sup>

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<sup>8</sup> Certain services for vacant or abandoned properties are eligible to address negative economic impacts of the pandemic on disproportionately impacted households or communities. Eligible activities include: Rehabilitation, renovation, maintenance, or costs to secure vacant or abandoned properties to reduce their negative impact; Costs associated with acquiring and securing legal title of vacant or abandoned

3. **Impacted** Nonprofits are eligible for the following activities/services:
  - direct assistance to nonprofits if the nonprofit has experienced a public health or negative economic impact as a result of the pandemic<sup>9</sup>.
  - A sub-recipient may identify a negative economic impact experienced by a nonprofit, or class of nonprofits, and design and implement a response to that negative economic impact.
4. **Disproportionately** Impacted Nonprofits are eligible for all activities/services listed above, as well as:
  - A sub-recipient may also identify a class of nonprofits that have been disproportionately impacted by the public health emergency and design and implement a program that responds to the source of that disproportionate impact.<sup>10</sup>
  - Building strong, healthy communities through investments in neighborhoods
    - Vacant or abandoned properties [for development of new business].<sup>11</sup>

### III. Premium Pay

The County is seeking an organization/agency to oversee distribution of Premium Pay. Premium Pay will not be distributed to individual organizations/agencies through this NOFA.

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properties and other costs to position the property for current or future productive use; Removal and remediation of environmental contaminants or hazards from vacant or abandoned properties, when conducted in compliance with applicable environmental laws or regulations; Inspection fees and other administrative costs incurred to ensure compliance with applicable environmental laws and regulations for demolition, or other remediation activities.

<sup>9</sup> For example, if a nonprofit organization experienced impacts like decreased revenues or increased costs (e.g., through reduced contributions or uncompensated increases in service need), and a sub-recipient provides funds to address that impact, then it is providing direct assistance to the nonprofit as a beneficiary under Subsection (c)(1) of Sections 602 and 603. Direct assistance may take the form of grants, in-kind assistance, technical assistance, or other services that respond to the negative economic impacts of the COVID-19 public health emergency.

<sup>10</sup> For example, a recipient may determine that nonprofits offering after-school programs were disproportionately impacted by the pandemic due to the previous in-person, indoors nature of the work and the nonprofits' reliance on fees received for services (e.g., attendance fees). The sub-recipient might then design an intervention to assist those nonprofits in adapting their programming (e.g., to outdoor or online venues), their revenue structure (e.g., adapting the fee for service structure or developing expertise in digital donation campaigns), or both.

<sup>11</sup> Certain services for vacant or abandoned properties are eligible to address negative economic impacts of the pandemic on disproportionately impacted households or communities. Eligible activities include: Rehabilitation, renovation, maintenance, or costs to secure vacant or abandoned properties to reduce their negative impact; Costs associated with acquiring and securing legal title of vacant or abandoned properties and other costs to position the property for current or future productive use; Removal and remediation of environmental contaminants or hazards from vacant or abandoned properties, when conducted in compliance with applicable environmental laws or regulations; Inspection fees and other administrative costs incurred to ensure compliance with applicable environmental laws and regulations for demolition, or other remediation activities.

**Premium pay** means an amount of up to \$13 per hour that is paid to an eligible worker, 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 in total over the period of performance with respect to any single eligible worker. Premium pay may be awarded to non-hourly and part-time eligible workers performing essential work. Premium pay will be considered to be in addition to wages or remuneration the eligible worker otherwise receives if, as measured on an hourly rate, the premium pay is:

- (1) With regard to work that the eligible worker previously performed, pay and remuneration equal to the sum of all wages and remuneration previously received plus up to \$13 per hour with no reduction, substitution, offset, or other diminishment of the eligible worker's previous, current, or prospective wages or remuneration; or
- (2) With regard to work that the eligible worker continues to perform, pay of up to \$13 per hour that is in addition to the eligible worker's regular rate of wages or remuneration, with no reduction, substitution, offset, or other diminishment of the worker's current and prospective wages or remuneration.

**Eligible workers** means workers needed to maintain continuity of operations of essential critical infrastructure sectors, including health care; emergency response; sanitation, disinfection, and cleaning work; maintenance work; grocery stores, restaurants, food production, and food delivery; pharmacy; biomedical research; behavioral health work; medical testing and diagnostics; home- and community-based health care or assistance with activities of daily living; family or childcare; social services work; public health work; vital services to Tribes; any work performed by an employee of a State, local, or Tribal government; educational work, school nutrition work, and other work required to operate a school facility; laundry work; elections work; solid waste or hazardous materials management, response, and cleanup work; work requiring physical interaction with patients; dental care work; transportation and warehousing; work at hotel and commercial lodging facilities that are used for COVID-19 mitigation and containment; work in a mortuary; and work in critical clinical research, development, and testing necessary for COVID-19 response.

**Essential work** means work that:

- (1) Is not performed while teleworking from a residence; and
- (2) Involves:
  - (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.



#### **IV. Culturally Responsive COVID-19 Disaster Response and Long-Term Recovery**

1. ***Disproportionately*** Impacted Households are eligible for the following activities/services:
  - Services that mitigate COVID-19, for example, transportation assistance to reach vaccination sites, mobile vaccination or testing programs, or on-site vaccination or testing services for homebound individuals, those in group homes, or similar settings.
2. ***County Departments, Businesses, and Nonprofits*** are able to use ARPA funds for the following activities/services<sup>12</sup>:
  - Improvements to or construction of emergency operations centers and acquisition of emergency response equipment (e.g., emergency response radio systems).
  - Costs of establishing public health data systems, including technology infrastructure.

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<sup>12</sup> Activity/service must be related to the COVID-19 Public Health Response