

## ARPA Eligible Beneficiaries

Beneficiaries eligible for services, as determined by the ARPA [Final Rule](#), are described below. Please also refer to [Attachment B: Prioritized ARPA Activities](#) for a list of specific ARPA-eligible activities prioritized by the Board of Supervisors.

As referenced below, a map of the Sonoma County Qualified Census Tracts can be found in [Attachment D](#).

### I. Households and Communities

#### A. **Impacted** Households and Communities

- Low<sup>1</sup>- or moderate<sup>2</sup>-income households or communities
- Households that experienced unemployment
- Households that experienced increased food<sup>3</sup> or housing insecurity<sup>4</sup>
- Households that qualify for the Children's Health Insurance Program, Childcare Subsidies through the Child Care Development Fund (CCDF) Program, or Medicaid
- *When providing affordable housing programs:* households that qualify for the National Housing Trust Fund and Home Investment Partnerships Program
- *When providing services to address lost instructional time in K-12 schools:* any student that lost access to in-person instruction for a significant period of time

#### B. **Disproportionately Impacted** Households and Communities

- Low-income households<sup>1</sup> and communities

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<sup>1</sup> Low-income household is defined as a household with: (1) Income at or below 185 percent of the [Federal Poverty Guidelines](#) published by the Department of Health and Human Services. Please note a default household size of three can be used for ease of administration (\$40,626 per year). Or (2) Income at or below 40 percent of the [Area Median Income](#) for its county and size of household according to the Department of Housing and Urban Development.

<sup>2</sup> Moderate-income household is defined as a household with: (1) Income at or below 300 percent of the [Federal Poverty Guidelines](#) published by the Department of Health and Human Services. Please note a default household size of three can be used for ease of administration (\$65,880 per year). Or (2) Income at or below 65 percent of the [Area Median Income](#) for its county and size of household according to the Department of Housing and Urban Development.

<sup>3</sup> Food **insecurity** is the limited or uncertain availability of nutritionally adequate and safe foods, or limited or uncertain ability to acquire acceptable foods in socially acceptable ways. Food **security** for a household means access by all members at all times to enough food for an active, healthy life. Food security includes at a minimum: The ready availability of nutritionally adequate and safe foods, and Assured ability to acquire acceptable foods in socially acceptable ways (that is, without resorting to emergency food supplies, scavenging, stealing, or other coping strategies).

<sup>4</sup> Housing insecurity is defined as not paying the full amount of rent or mortgage and/or utility bills (gas, oil, or electricity) sometime in the previous 12 months.

- Households residing in Qualified Census Tracts<sup>5</sup>
- Households that qualify for certain federal benefits:
  - Temporary Assistance for Needy Families (TANF)
  - Supplemental Nutrition Assistance Program (SNAP) / CalFresh
  - 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
- Households receiving services provided by Tribal governments

## II. Unemployed and Underemployed Workers

***Unemployed and Underemployed Workers*** are defined as individuals who want and are available for work, including those who have looked for work sometime in the past 12 months or who are employed part time but who want and are available for full-time work.

## III. General Public

When providing behavioral health services, the impacted population is identified as the general public and presumes that all programs and services are reasonably proportional responses to the harm identified unless a response is grossly disproportionate to the type or extent of harm experienced. In other words, behavioral health services can be provided to members of the general public without any further analysis of impacts of the pandemic on those individuals and whether the service is responsive.

## IV. Small Businesses

***Small business*** is defined as a business concern or other organization that: (1) Has no more than 500 employees or, if applicable, the size standard in number of employees established by the Administrator of the Small Business Administration for the industry in which the business concern or organization operates, and (2) Is

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<sup>5</sup> The legislation has defined households, small businesses, and non-profits located in HUD Qualified Census Tracts as having been Disproportionately Impacted by the pandemic. The County is expanding the list of prioritized service areas, taking into account the Human Development Index (HDI) scores revealed in the [Portrait of Sonoma County: 2021 Update](#) as well as health data related to the effects of COVID-19 on specific populations. See [Attachment D – Map of Sonoma County Qualified Census Tracts](#).

a small business concern as defined in section 3 of the Small Business Act (15 U.S.C. 632).

**Micro-business** is defined as a small business that has five or fewer employees, one or more of whom owns the small business.

A. **Impacted** Small Businesses

- Small businesses that experienced decreased revenue or gross receipts
- Small businesses that experienced financial insecurity
- Small businesses that faced increased costs
- Small businesses that don't have the capacity to weather financial hardship
- Small businesses challenged with covering payroll, rent or mortgage, and other operating costs

B. **Disproportionately Impacted** Small Businesses

- Small businesses operating in Qualified Census Tracts
- Small businesses operated by Tribal governments or on Tribal lands

## V. Nonprofits

**Nonprofit** is defined as a nonprofit organization that is exempt from Federal income taxation and that is described in section 501(c)(3) or 501(c)(19) of the Internal Revenue Code.

A. **Impacted Nonprofits**

- Nonprofits that experienced decreased revenue (e.g., from donations and fees)
- Nonprofits that that experienced financial insecurity
- Nonprofits that faced increased costs (e.g., uncompensated increases in service need)
- Nonprofits that don't have the capacity to weather financial hardship
- Nonprofits challenged with covering payroll, rent or mortgage, and other operating costs

B. **Disproportionately Impacted** Nonprofits

- Nonprofits operating in Qualified Census Tracts
- Nonprofits operated by Tribal governments or on Tribal lands

## VI. Title 1 Eligible Schools

**Title 1 eligible schools** means schools eligible to receive services under section 1113 of Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6313), including schools served under section 1113(b)(1)(C) of that Act.

A. **Disproportionately Impacted** Title 1 Eligible Schools

*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.