Cumberland County SLFRF   Pre- Application Q&A

Thank you for your participation in the County's SLFRF Pre-application Process. The following is a quick guide, to answering questions related to our current Pre-Application. Below are a list of common questions that have requested County feedback. Each question also has the corresponding citation for which County Compliance is referencing.

Does your project or Program qualify for SLFRF?

To determine if your project or program is included as an eligible use, your project or program must be a direct response to the COVID-19 public emergency. To identify if you are responding to COVID-19 you must be able to answer the following questions and provide supportive evidence based data:

1. Does your Program or Project identify a need or negative impact of the COVID-19 public Health emergency?
2. Does your program or Project address said need or impact?

> *Citation* **https://www.federalregister.gov/d/2021-10283/p-46**

Does your project or services meet the one of the follow core categories of eligible uses?

Building Stronger Communities through Investments in Housing and Neighborhoods. Housing and Homeless are two core County categories that both touch on the impact Covid-19 has had on disproportionately impacted populations and communities. Programs and services within this Core housing category, must be in either a qualified census tract where services are provided to households and populations living within the QCT. **Or** Serves and programs that are provided to households, businesses or populations disproportionately impacted by the COVID-19 public Health Emergency.

These Programs also must identify measurable based on evidence- based interventions. Examples of Programs or services that address housing insecurity, lack of affordable housing, or homelessness, including:

(A) Supportive housing or other programs or services to improve access to stable, affordable housing among individuals who are homeless;

(B) Development of affordable housing to increase supply of affordable and high-quality living units;

> *Citation:* **https://www.federalregister.gov/d/2021-10283/p-171**

Infrastructure- This category is limited to necessary investments in Water, Sewer or Broadband infrastructure. It is important to note that water and Sewer Infrastructure projects should align, with eligible uses under the Environmental Protection Agency's Drinking Water and Clean Water State Revolving Funds. Broadband infrastructure that is designed to provide service to unserved or underserved households and businesses and that is designed to, upon completion:

> (i) Reliably meet or exceed symmetrical 100 Mbps download speed and upload speeds; or

> (ii) In cases where it is not practicable, because of the excessive cost of the project or geography or topography of the area to be served by the project, to provide service meeting the standards set forth in paragraph (e)(2)(i) of this section:

>> (A) Reliably meet or exceed 100 Mbps download speed and between at least 20 Mbps and 100 Mbps upload speed; and

>> (B) Be scalable to a minimum of 100 Mbps download speed and 100 Mbps upload speed.

> ➤ Citation: **https://www.federalregister.gov/d/2021-10283/page-26804**

Healthcare – Funds provide resources to meet and address emergent public health needs, including COVID-19 Mitigation/Prevention, Behavioral Health Care, Expenses to Improve Design and Execution of Health Program, Mental Health Services and Substance use Services. Additionally, through programs or services that address disparities in public health that have been exacerbated by the pandemic.

> ➤ Citation: **https://www.federalregister.gov/d/2021-10283/p-43**

Workforce Training- Workforce gaps are a significant challenge in Cumberland County and have widened during the COVID-19 pandemic. Cumberland County is working to establish partnerships with job trainers and job seekers - in particular, delegates from marginalized communities and the New American population - toward job training programs and certifications. Directing able workers toward custom training and available jobs will fill gaps in the workforce and give disproportionately impacted residents an opportunity to grow their careers.

> Programs and Projects that pair well with the State's Employment Services activities are highly encouraged. Recipients must demonstrate that funding uses directly address a negative economic impact of the COVID-19 public health emergency, including funds

used for economic or workforce development. For example, job training for unemployed workers may be used to address negative economic impacts of the public health emergency and be eligible.

Assistance to unemployed workers, including:
- Subsidized jobs, including for young people. Summer youth employment programs directly address the negative economic impacts of the pandemic on young people and their families and communities;

Programs that provide paid training and/or work experience targeted primarily to (1) formerly incarcerated individuals, and/or (2) communities experiencing high levels of violence exacerbated by the pandemic;

- Programs that provide workforce readiness training, apprenticeship or pre-apprenticeship opportunities, skills development, placement services, and/or coaching and mentoring; and

- Associated wraparound services, including for housing, health care, and food.

> Citation: https://home.treasury.gov/system/files/136/SLFRPFAQ.pdf SECTION 2.8 & 4.8 page 22-23 DATED 07/19/.21
> > Citation: https://www.federalregister.gov/d/2021-10283/p-34

How many Pre- Applications can I submit?

Please only submit a maximum of Three Pre- Applications, per Municipality or agency. Each application should outline only one service or project you are seeking funding support. For example, you may have an activity within the Public Health Category that addresses multiple uses, please select the use that best outlines the nexus between your projects and its response and impact measure to COVID- 19. Or select the option list as Public Health Other.

Does your program or project Target economically disadvantaged Communities?

To maximize the impact of the ARPA, the U.S. Department of the Treasury must ensure resources are targeted to the lowest-income and most marginalized households. The County alongside Treasury recognizing the disproportionate impact of the pandemic- related recession on low-income communities. As such the County must report whether a program is or is not. The following are ways you can demonstrate you are targeting this community:

- If your program or service is provided at a **physical location in a Qualified Census Tract** (for multi-site projects, if a majority of sites are within Qualified Census Tracts);
- A program or service where the primary intended beneficiaries live within a Qualified Census Tract;

- The program provides services that are primary intended targeted towards beneficiaries earn less than 60 percent of the median income for the relevant jurisdiction (e.g., State, county, metropolitan area, or other jurisdiction); or
- A program or service for which the eligibility criteria are such that over 25 percent of intended beneficiaries are below the federal poverty line.
  - ➢ *Citation:* **https://www.federalregister.gov/d/2021-10283/p-499**
  - ➢ **https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/state-and-local-fiscal-recovery-funds/recipient-compliance-and-reporting-responsibilities**

What is a Qualified Census Tract QCT:

A qualified Census Tract is a particular area or block group were 50% or more of the households living within this area have incomes that are below 60% of the area median gross income, or which has a poverty rate of at least 25 percent. These tracts are designated by HUD, based on current census data and can be found here. Please note these are not the same as CDBG or Home as both use data based on 80% of AMI.

If your project or program does not meet the QCT, **The County may allow recipients to provide these services to other populations, households, or geographic areas disproportionately impacted by the pandemic. However, The County will require applicants to initially identify these disproportionately-impacted communities, recipients, and will require that the agency applying   provide supportive data from reliable sources to base their determination for how the pandemic disproportionately impacted the populations, households, or geographic areas to be served.**

  - ➢ Citation: https://www.federalregister.gov/d/2021-10283/p-92
  - ➢ Citation: 31 CFR 35.6(b)(12) Qualified census tract has the same meaning given in 26 U.S.C. 42(d)(5)(B)(ii)(I).

KEY DATES!

ARPA funds must be obligated no later than December 31, 2024.

  - ➢ https://www.federalregister.gov/d/2021-10283/p-576

Do I need match funding?

We do not require a match for your ARPA application however it is important to note the following: Recovery Funds cannot be used as the local match for other federal programs (i.e. Medicaid, EDA, EPA Drinking Water and Clear Water State Revolving Funds), unless specifically allowed by the underlying/source federal program. It is important to note that counties may use their Funds to match other state and local government allocations of Treasury ARP Recovery Funds, if used within the county.

➢ **https://www.federalregister.gov/d/2021-10283/p-576**
➢ **2 CFR 200.320(c)(1)-(3) and (5)**
➢ **https://home.treasury.gov/system/files/136/SLFRF-Compliance-and-Reporting-Guidance.pdf pg 9 Section D #6**

Why do I have to register with SAMS?

All eligible recipients are required to have an active registration with the System for Award Management (SAM). Per the Compliance and Reporting, requirements set forth by Treasury and the use of the ARPA funds the County must report and require subrecipients identify and register within SAMS.

Additionally, by April of 2022, the federal government will stop using the DUNS number to uniquely identify entities. At that point, entities doing business with the federal government will use a Unique Entity Identifier (SAM) created in SAM.gov. They will no longer have to go to a third-party website to obtain their identifier. This transition allows the government to streamline the entity identification and validation process, making it easier and less burdensome for entities to do business with the federal government.

To complete a new System for Award Management (SAM) registration as a business for federal contracting or grants, or nonprofit entity for grants. Please go to (https://www.sam.gov). Your SAM registration will be valid for one year from the date the registration is complete.

Citations:

➢ https://home.treasury.gov/system/files/136/SLFRF-Compliance-and-Reporting-Guidance.pdf Page 7 #4
➢ https://home.treasury.gov/system/files/136/SLFRF-Compliance-and-Reporting-Guidance.pdf Page 10#1
➢ https://home.treasury.gov/system/files/136/SLFRF-Compliance-and-Reporting-Guidance.pdf pg. 18 Paragraph 4
➢ https://www.gsa.gov/about-us/organization/federal-acquisition-service/office-of-systems-management/integrated-award-environment-iae/iae-systems-information-kit/unique-entity-identifier-update