

SLFRF Roadmap

City of Cambridge, MA

SLFRF Project Profile

July 21st, 2022



Funding Allocation

The State and Local Fiscal Recovery Fund

The State and Local Fiscal Recovery Fund (SLFRF) grant program is a response to the COVID-19 pandemic.

The City of Cambridge's direct allocation includes \$65 million, Cambridge's State ARPA/Middlesex allocation is \$23 million and <u>the combined total available to the City of Cambridge is \$88.1 million</u>.



\$350 billion

Allocated to cities, counties and tribal governments nationwide



\$3.4 billion

Allocated to cities and communities in Massachusetts using a predetermined formula

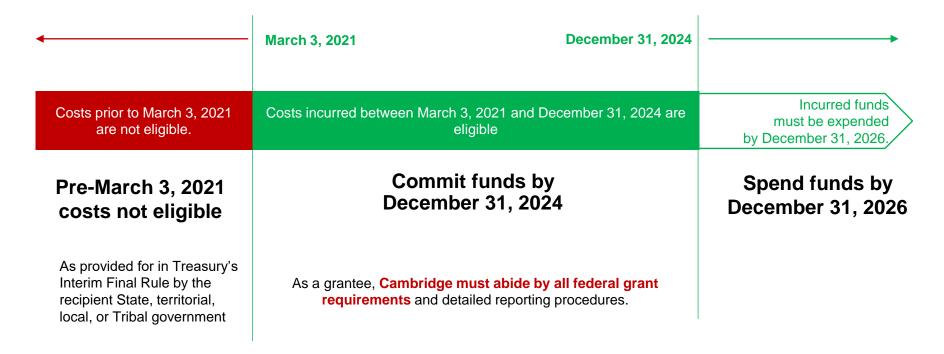


\$88.1 million

The City of Cambridge's ultimate share is \$88.1 million, a combination of its direct allocation and State ARPA Funding for Middlesex

https://home.treasury.gov/system/files/136/Allocation-Methodology-for-MetropolitanCities-508A.pdf

Cambridge has a three-year window to commit the remaining funds



Determine Eligibility

Steps for Determining a Project

Step 1

Articulate Harm/Impact

Step 2

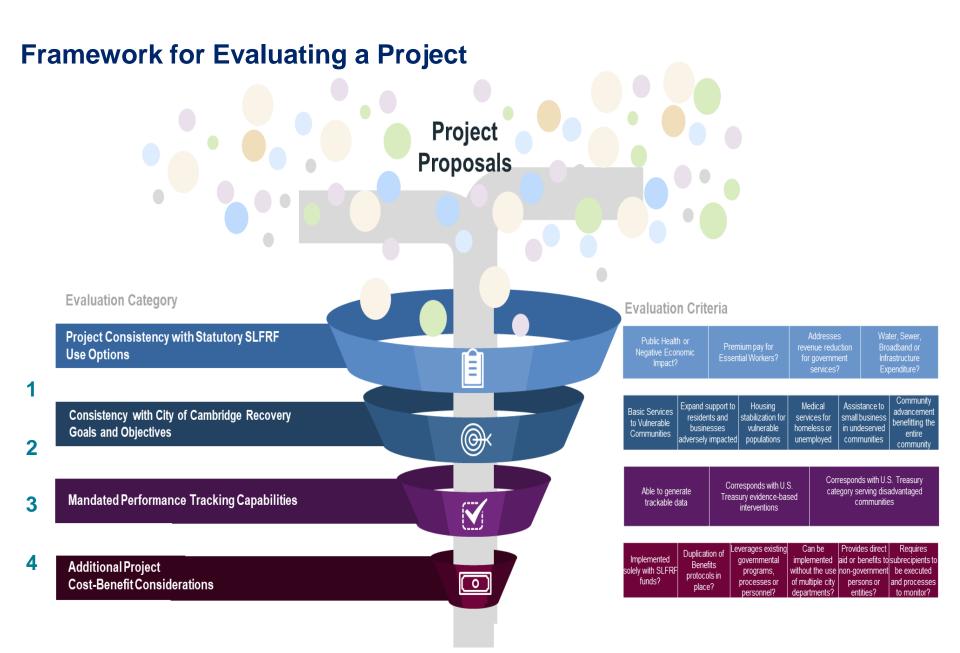
Identify Target Beneficiary

Step 3

Align with Enumerated Use

- Identify whether the project description sufficiently articulates a covered COVID public health or negative economic impact or harm or relates to covered premium pay or W-S-B infrastructure
- Assess whether, and the extent to which that harm resulted from the COVID-19 public health emergency
- Assessing whether the project idea has a clear intended targeted class that meet Treasury's definition of impacted or disproportionately impacted depending on the use area (public health, Neg Impact -Households, Neg. Impact -Small Biz, Neg. Impact – Nonprofits)
- Focus on presumed impacted or disproportionately impacted entities or establish a separate impacted and/or disproportionately impacted class
- Determine whether the project idea aligns with an eligible enumerated use and /or disproportionally impacted classes that can be pursued for the type of targeted class identified for the project or, in the alternative, that the project is supported by evidence for an alternative use that is consistent with the type of enumerated uses that can be pursued for the identified target class
- Construct an alternative use that is related and reasonably proportional to the identified economic/public health harm experienced by the selected targeted class

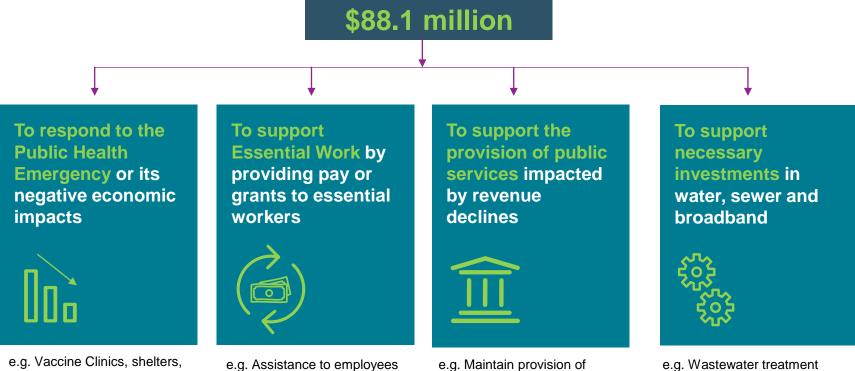




Statutory Categories

Cambridge's use of the funds must fit into one of four statutory categories

The City and subrecipients have substantial discretion to support the needs of constituents



e.g. Vaccine Clinics, shelters, food and supplies, eviction protection, nonprofit support

e.g. Assistance to employees classified as Essential, municipal and non-municipal

e.g. Maintain provision of public sector programs that can show revenue impact

e.g. Wastewater treatment projects, energy conservation, municipal broadband

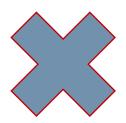
The fund rules explicitly outline three categories of ineligible uses:

Satisfying Federal Matching Fund Needs



Using the money for projects requiring the jurisdiction to provided federal matching funds

Providing premium pay to teleworking employees



Premium pay for employees who were able to telework during the public health emergency

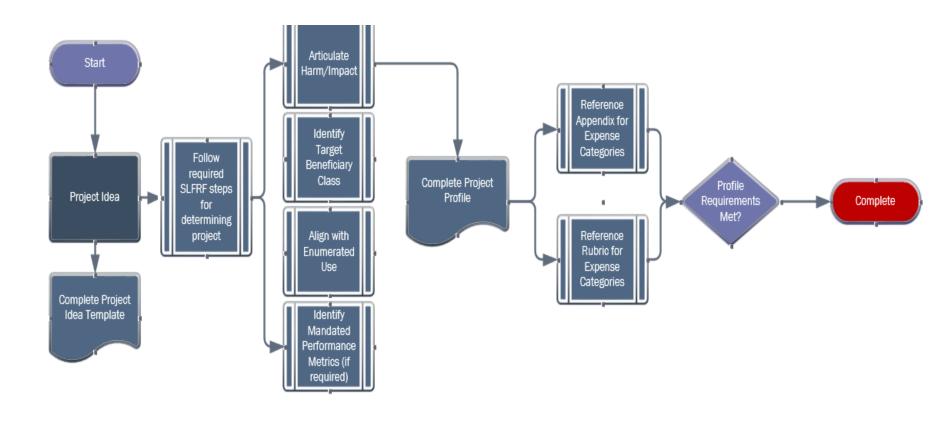
Pensions, debt or reserve funds



Funding pension accounts, paying off outstanding debt, or making deposits to reserve accounts, rainy day funds or free cash

Project Profile Roadmap

Roadmap to Create a Project Profile





Project Profile

Project Profile

Upon determination that the project meets the below requirements:

Articulate Harm/Impact, Identify Target Beneficiary & Align with Enumerated Use

Purpose of Project Profile Template

- The purpose of the profile is to enable a grantee of Federal State & Local Coronavirus Fiscal Recovery Funding (SLFRF) to describe the intended project in the context of relevant elements from the U.S. Treasury Final Rule
- The profile is intended as an aid in furtherance of compliance with U.S. Treasury SLFRF Rules; mandated SLFRF reporting content requirements, and other applicable federal regulations
- Completion of the profile should not be construed as a substitute for all measures
 necessary to assure that project design and execution details, including related costs,
 are properly documented and reported upon pursuant to rules governing the use of
 SLFRF and the overarching Code of Federal Regulations
- In completing the profile, reference to U.S. Treasury SLFRF Rules and the separate U.S. Treasury SLFRF Guidance is recommended

Rubric

Negative Economic Impact on Household/Individuals

Identifying the Class in the Rubric (page 4)

Class Categories	Impacted Classes	Disproportionately Impacted Classes		
	(Presumed Impacted) Households that experienced unemployment or increased food or housing insecurity because of the pandemic	(Presumed Disproportionately Impacted) Households residing in QCTs		
	(Presumed Impacted) Low Income Households at or below 185% of FPG for size of the household based on current poverty guidelines by Dept. of Health and Human Services or income at or below 40% of AMI for its county and size of households based on current data by Department of Housing and Urban Development.	(Presumed Disproportionately Impacted) Households receiving services provided by Tribal governments; residing in the U.S. territories or receiving services from territorial governments.		
	(Presumed Impacted) Moderate Income households with income at or below 300% of the FPG for the size of its household based on the most recently published poverty guidelines by HHS, or income at or below 65% of the AMI for its county and size of household based on the most recently published data by HUD.	(Presumed Disproportionately Impacted) Low Income Households as defined for qualifying impacted classes.		
Households/ Individuals	(Presumed Impacted) Households qualifying for: a) Children's Health Insurance Program b) Childcare Subsidies through Child Care and Development Fund c) Medicaid d) National Housing Trust Fund for affordable housing programs e) Home Investment Partnerships Program for affordable housing	(Presumed Disproportionately Impacted) Households qualifying for: a) Temporary Assistance for Needy Families b) Supplemental Nutrition Assistance Program c) Free and Reduced-Price Lunch and/or School Breakfast d) Medicare Part D Low-income Subsidies e) Supplemental Security Income f) Head Start and/or Early Head Start g) Special Supplemental Nutrition for Women, Infants, and Children h) Section 8 Vouchers i) Low-Income Home Energy Assistance Program j) Pell Grants k) For services to address educational disparities, Title I schools are disproportionately impacted enabling whole school support		
	(Not Presumed) Recipients can establish other impacted classes but should be able to support their determination that the pandemic resulted in negative public health or economic outcomes to the specific populations, households, or geographic areas to be served.	(Not Presumed) Recipients can establish other disproportionately impacted household classes but should support their determination that the pandemic resulted in disproportionate public health or economic outcomes to the specific populations, households, or geographic areas to be served comparative to typical or average pandemic impacts in their local area, state, or nationally. To augment their analysis, or when quantitative data is not readily available, recipients may also consider qualitative research and sources like resident interviews or feedback from relevant state and local agencies. In both cases, recipients should consider the quality of the research, data, and applicability of analysis to their determination.		



Economic Impact on Household/Individuals

Identifying Eligible Use in the Rubric (page 18)

Class Categories	Impacted Class Eligible Uses	Disproportionately Impacted Class Eligible Uses			
	Food Assistance				
	Rent, mortgage, utility, and other housing cost assistance				
	Counseling and legal aid to prevent eviction or homelessness				
	Emergency assistance for burials, home repairs, weatherization, or other needs				
	Internet access or digital literacy assistance				
	Cash Assistance				
	Survivor's benefits				
	Assistance accessing or applying for public benefit	s or services			
	Promoting healthy childhood environments (Childcare, home visits, child welfare, early learning)				
	Addressing the impacts of lost instructional time				
	Promoting long-term housing security: affordable	housing and homelessness			
	Permanent Supportive Housing				
Households/	Paid sick, medical, or family leave				
Individuals	Health insurance				
	Services for the unbanked and underbanked				
	Assistance to Unemployed and Underemployed Workers (job training, transition, start-ups, jobs programs)				
	Recipient Unemployment Insurance Trust Funds and Related Expenses				
	Paying interest on advances received under Title XII of the Social Security Act (42 U.S.C. 1321)				
		Addressing health disparities (community health workers, lead paint removal, medical facilities)			
		Housing vouchers and assistance relocating			
		Building strong, healthy communities through investments in neighborhoods (parks, Green Spaces, Recreational facilities, sidewalks and pedestrian safety features, access to healthy foods, streetlights, Neighborhood cleanups, other projects to revitalize public spaces, and certain services for vacant or abandoned properties			
		Services to Address Educational Disparities			



Negative Economic Impact Small Business & Nonprofits

Identifying the Class in the Rubric (page 4)

Impacted Class			Disproportionately Impacted Class			
	Small Businesses	(Not Prasumed) Recipients may designate a class of small businesses that experienced a negative economic impact (e.g., microbusinesses, small businesses in certain economic sectors) or areas (e.g., downtown, business districts, etc.), design an intervention to fit the impact, and document that the individual entity is a member of the targeted class (e.g., restaurants in the downtown area had generally experienced a negative economic impact and provide assistance to those small businesses to respond).	(Not Presumed) Recipients may designate a class of small businesses that experienced a disproportionate negative economic impact (e.g., microbusinesses, small businesses in certain economic sectors) or areas (e.g., downtown, business districts, etc.), design an intervention to fit the impact, and document that the individual entity is a member of the class. To augment their analysis, or when quantitative data is not readily available, recipients may also consider qualitative research and sources like resident interviews or feedback from relevant state and local agencies and business stakeholders.			
Nonpi		(Presumed Impacted) Nonprofits evidencing impacts such as decreased revenues or increased costs (e.g., through reduced contributions or uncompensated increases in service need) are presumed impacted.	(Presumed Disproportionately Impacted) Nonprofits operating in QCTs or operated by Tribal governments, on Tribal Lands, or in U.S. territories are presumed to have been disproportionately impacted.			
	Nonprofits	(Not Presumed) Recipients may designate a class of nonprofits that experienced a negative economic impact, design an intervention to fit the impact, and document that the individual entity is a member of the targeted class.	(Not Presumed) Recipients may designate a class of nonprofits that experienced a disproportionate negative economic impact, design an intervention to fit the impact, and document that the individual entity is a member of the class. To augment their analysis, or when quantitative data is not readily available, recipients may also consider qualitative research and sources like resident interviews or feedback from relevant state and local agencies and business stakeholders.			

Negative Economic Impact Small Business & Nonprofits Identifying Eligible Use in the Rubric (page 11)

	Loans or grants to mitigate financial hardship			
	Loans, 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			
	Assistance to small business startups or microbusinesses with additional costs associated with COVID-19 mitigation tactics			
	Responses to a negative economic impact of COVID-19 on new small business startups or microbusinesses			
	Support for individuals who have experienced a negative economic impact from the pandemic, including uses that provide job			
Small	training for unemployed individuals and initiatives that support small business start-ups, microbusinesses, and individuals			
Businesses	seeking to start small or microbusinesses			
	Certain capital investments, such as rehabilitation of commercial			
	properties, storefront improvements, and façade improvements			
	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			
	Direct assistance may take the form of loans, grants, in-kind assistance, technical assistance, or other services that respond to			
	the negative economic impacts of the COVID-19 public health emergency.			
Nonprofits	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.			



Reporting Requirements



Reporting Requirements required throughout the period are significant

Subrecipients need to provide information as needed

Project Reports	Expenditure data	Project Status Reports	Project Demographic Distribution	Subawards	Civil Rights Compliance	Programmatic data	Project-level data (Infrastructure Projects)
 Category Narrative descriptions Metrics 	 Current period obligation Cumulative obligation Current period expenditure Cumulative expenditure 	 Not Started Completed less than 50 percent Completed 50 percent or more Completed 	Evidence that certain types of projects are targeted to economically disadvantaged communities	Detailed obligation and expenditure information for any contracts and grants awarded, loans issued, transfers made to other government entities	Narrative describing the recipient's compliance with Title VI, along with other questions and assurances	• H • S A • A • H In • R S • E	Payroll Idousehold Assistance Small Business Economic Assistance Lid to Travel, Tourism, and Hospitality or Other Impacted Industries Rehiring Public Sector Staff Education Assistance Premium Pay Revenue Replacement

Required Programmatic Data

Public Health

- Structure and objectives of assistance program, including public health or negative economic impact experienced
- How subrecipients response is related and reasonably and proportional to a public health or negative economic impact of COVID-19.
- Public Health Projects Providing Household Assistance:
 - Number of individuals served (by program if recipient establishes multiple separate household assistance programs)
- Public Health Projects Providing Small Business Assistance:
 - Number of small businesses served (by program if recipient establishes multiple separate small businesses assistance programs)
- Program Goals: What are the program goals? What are the key performance indicators? (i.e., what are the program output and outcome measures?

Required Programmatic Data

Negative Economic Impact

- Brief description of structure and objectives of assistance program(s), including public health or negative economic impact experienced
- Brief description of how a recipient's response is related and reasonably and proportional to a public health or negative economic impact of COVID-19.
- Household Assistance Number of households served (by program if recipient establishes multiple separate household assistance programs)
- Education Assistance National Center for Education Statistics ("NCES") School ID or NCES District ID.
- Business or Nonprofit Assistance
 - Small Business Economic Assistance Number of small businesses served
 - Assistance to Non-Profits Number of Non-Profits served

Required Programmatic Data

Capital Expenditures over \$1 million

- A description of the specific negative economic harm or need to be addressed, including quantitative information on the extent and the type of harm, such as the number of individuals or entities affected.
- Explanation of why a capital expenditure is appropriate; why
 existing equipment and facilities, or policy changes or additional
 funding to pertinent programs or services, would be inadequate.
- Comparison of proposed capital project against at least two alternative capital expenditures and demonstration of why the proposed capital expenditure is superior.

Federal Compliance

Depending on the nature of the project, other federal regulations may apply outside of SLFRF program requirements.

- 1. Existing written policies and procedures for adhering to Uniform Cost Principles under the Code of Federal Regulations (2 C.F.R. 200)
- 2. Existing written policies and procedures for adhering to applicable federal, state, and local procurement, contracting, and conflicts-of-interest laws and regulations (including validation that contractors are in good standing).
- 3. Applicability and related compliance protocols related to Federal civil rights and nondiscrimination requirements.
- 4. Existing written policies and procedures for monitoring and addressing instances of Duplication of Benefits when multiple public and philanthropic funds are used for the same programmatic purpose.
- 5. Existing written policies and procedures for governing, monitoring, and documenting fund utilization or disbursements among subrecipients and beneficiaries.

State and Local Fiscal Recovery Fund

Accurate reporting will be essential to avoid future grant complications

- Grants must abide by all federal grant requirements and detailed reporting procedures
- While the discretion given for compliance is broad, documentation must still be submitted

THE BALTIMORE SUN

City ordered to repay \$3.7 million federal homeless grant

The federal government has ordered Baltimore to pay back \$3.7 million from a homeless services grant, saying the city and its subcontractors cannot sufficiently account for how the money was spent.

But anti-poverty organizations say a federal audit unfairly vilified their work, and they blamed the U.S. Department of Housing and Urban Development for providing poor accounting guidelines during a rushed rollout of stimulus funds several years ago.

Questions







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