DECEMBER 2021

Tracking Federal Economic Recovery Funds to Communities

A Guide for Local Governments, Advocates, and Community-Based Organizations



About This Guide

As the US economy recovers from the COVID-19 pandemic, state and local governments must decide how to use (1) an unprecedented infusion of federal funding for pandemic relief and recovery and (2) recently passed infrastructure and anticipated additional social and climate policy funds. Beyond the flexible funding that state and local governments have received through the Coronavirus Relief Fund and State and Local Fiscal Recovery Funds, federal funds are flowing into local communities through a complex array of additional grant programs, each with unique eligibility rules and restrictions on uses of funding.

Public understanding of the federal funding coming to local governments can facilitate greater community engagement with budget decisions, and continued awareness of how funds are being spent can support accountability and alignment with community priorities. Advocates and community-based organizations can use this guide to track federal funding allocations to their city, county, or region. This guide builds on and updates earlier research on tracking federal grants to local governments (Randall et al. 2018), focusing on information and tools specific to COVID-19 recovery and relief programs.

Equipped with this information, advocates and community-based organizations can encourage local policymakers and program administrators to align uses and expenditures of these funds with local equity goals and address the disproportionate harm done by the pandemic to Black and Latinx communities (Stacy and Fiol 2021).¹ This in turn can help ensure that federal funds build a more equitable and inclusive economy over the long term.

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About This Guide

This guide is divided into four sections:

- Background information on federal COVID-19 relief and recovery dollars
- Understanding federal grants' process, terminology, and sources of information
- Data sources for grant allocations and expenditures at the federal and local levels
- Additional resources, such as links to data portals, external analyses, and other resources

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Overview of Federal Relief and Recovery Legislation

	Selected COVID relief legislation			Other
	CARES Act	CRRSAA	ARPA	IIJA
Total funding	\$2.2 trillion	\$900 billion	\$1.9 trillion	\$1.2 trillion
Flexible state and local aid	\$150 billion	None	\$350 billion	None
Additional state and local recovery funding	\$50 billion	\$51 billion	\$120 billion	\$533 billion
Sources of additional funding	CDBG and other housing assistance; economic development; transit; child care	Emergency rental assistance; highways and transit	CDBG and other housing assistance; economic development; transit and other infrastructure	Highways, transit, and rail; climate resilience; rural bridges program
Funds available through	2021	Multiyear periods	2024-25 or until expended	2026

The Coronavirus Aid, Relief, and Economic Security Act (CARES) Act and American Rescue Plan Act (ARPA) are providing a combined total of \$500 billion in flexible aid to state and local governments, of which approximately \$180 billion went directly to cities and counties. However, flexible aid represents only a fraction of the total spending support authorized by these bills.

Source: Urban Institute analysis; Katz et al. (2021); NACo (2021).

Note: See appendix A for a detailed list of programs included in "Additional state and local recovery funding" total.

Urban Institute researchers

analyzed grant programs funded through CARES, ARPA, the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA), and Infrastructure Investment and Jobs Act (IIJA). The analysis identified an additional \$754 billion in grant funding flowing to state and local governments. This total reflects grant programs that received at least \$1 billion in funding that can be used to invest in economic recovery. The total excludes payments to individuals, nonprofits, and businesses, as well as funds that can only be used for pandemic emergency response and relief.

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Understanding Federal Grants

Types of Federal Grants

The federal government provides a few different types of financial assistance to state and local governments. This guide focuses on discretionary grants funded through appropriations acts and does not touch on cooperative agreements, contracts, federal assistance to nongovernment entities, or mandatory federal spending. In general, grants are financial assistance awarded without the expectation of federal involvement in spending or the provision of goods or services to the federal government in return.² Grants can be categorized by how the funding amounts are determined, how recipients are selected, and how flexible the funds are.

Award amounts can either be determined by formula—federal agencies distribute available funding to all recipients of a certain type, usually state and local governments, according to quantitative criteria—or competitively. Many program formulas are population based, and some are weighted to account for indicators of need such as unemployment, poverty, housing instability, school enrolment, local costs, existing infrastructure, and population density. All grants have restrictions on how recipients can use funds, but these restrictions vary. Block grant guidance may describe general areas where recipients can spend funds, whereas categorical grant

	Block grants	Formula categorical grants	Project categorical grants
Funds awarded	According to formula	According to formula	At agency discretion
Applicant selection	Non- competitive	Non- competitive	Competitive
Eligible uses of funding	Broad	Narrow	Narrow and limited to proposed project
Analogous CFDA/ SAM.gov category	A – Formula grants	A – Formula grants	B – Project grants

Adapted from ACIR (1978) and Dilger and Cecire (2019).

guidance will typically enumerate specifically allowed and prohibited activities.

Some one-time pandemic relief and recovery programs, such as Coronavirus State and Local Fiscal Recovery Funds, are classified as "Direct Payments for Specified Use" instead of grants in federal USAspending data. However, we treat these programs similarly to block grants if they provide payments to state and local governments.

Definitions of Federal Grant Terms

Definitions of terms used in the federal grant process are provided on <u>Grants.gov</u> and <u>USAspending.gov</u>. The USASpending glossary defines terms in plain language and includes official definitions from federal guidance where applicable.

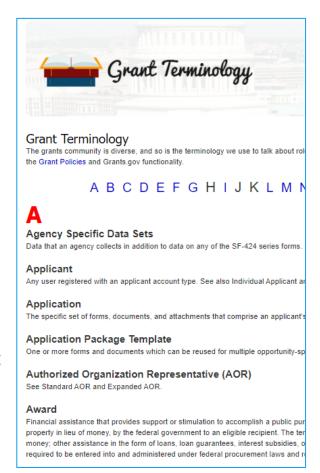
Be aware that some terms have multiple meanings in the context of federal grants and the larger federal budget process. For example, "discretionary" can refer to a broad category of spending that encompasses multiple types of grants:

"Discretionary spending' refers to outlays from budget authority that is provided in and controlled by appropriation acts" (GAO 2005).

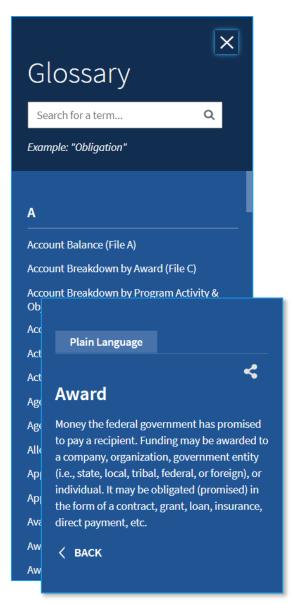
as well as to a specific type of grant, per Grants.gov:

"A grant (or cooperative agreement) for which the federal awarding agency generally may select the recipient from among all eligible recipients, may decide to make or not make an award based on the programmatic, technical, or scientific content of an application, and can decide the amount of funding to be awarded."³

In this guide, we refer to this second type of grants as competitive.



Grants terminology on Grants.gov



USAspending.gov Glossary tool

The Grant Process

Congress starts the process of discretionary federal spending by passing appropriations acts (as opposed to "mandatory" spending, which can occur without an appropriations act). These acts provide funds to be spent by federal agencies for either flexible or narrowly defined purposes.

The federal agencies then implement programs funded by appropriations legislation. For noncompetitive grants, agencies determine recipients' share of total funding using formulas specified in legislation or regulations, and for competitive grants, agencies determine award amounts and select grantees from eligible applicants ("allocations"). When agencies formally award funds, they enter into a binding agreement to make a payment known as an obligation. Award funds are disbursed, or outlayed, to recipients.

Recipients then allocate and spend funds for eligible uses either directly on services or through subawards. Recipients also document how their expenditures comply with program rules and guidance. The recipients provide financial and programmatic reports to awarding agencies and the awarding agencies submit award data to the Treasury department (concurrent reporting is shown on the flowchart in yellow boxes). Award recipients then "close out" their grant by submitting final reports and evidence of compliance with grant requirements within 90 days of the funds expiring.

Federal Federal Federal Federal allocations obligations appropriations outlays Agencies Agencies Congress allows Agencies apportion award grants, federal agencies disburse total program enter into to incur payments budget obligations and → funding among all agreements, make payments state/local eligible and sign for specified recipients recipients or contracts purposes select from competitive applicants Agency reports obligations incurred, outlayed funds, and grants and contracts awarded to subrecipients to the Treasury Department State/local State/local State/local planning obligations outlays Recipient Recipient agency Jurisdiction allocates funds awards contracts spends funds to agencies and and other initiatives funding commitments Recipient reports Recipient reports Recipient reports expenditures to planned projects grants, contracts, federal government and compliance and loans with program quarterly or quarterly and/or rules to federal annually annually and may government also post procurement data

publicly

Assistance Listings and CFDA Numbers

Federal agencies must generally submit information on all federal funding opportunities to <u>SAM.gov</u>. Each **assistance listing** has a unique assistance listing number, more commonly known as a **CFDA number**, because SAM replaced the former Catalog of Federal Domestic Assistance.

SAM listings provide a high-level summary of the requirements and intended outcome of assistance programs; information on whether funds are awarded by formula or at the discretion of administrators; the projected amount of funding and source of funding; and eligibility, reporting, and audit requirements.

Prospective grant applicants register with SAM to apply for grants and are advised to use SAM for preliminary planning purposes. Users can filter listings by federal agency, assistance type, eligibility, location, and date of publication. Once users identify programs of interest, they can find corresponding notices of funding opportunities on grants.gov by matching up the CFDA number of the program.⁴

This may be particularly useful when searching for funding opportunities provided through preexisting grant programs. The assistance listing and finalized CFDA number for the new Coronavirus State and Local Fiscal Recovery Funds program were not immediately available in the initial months following the passage of ARPA, for example.⁵



Excerpt of assistance listing for Coronavirus State and Local Fiscal Recovery Funds. The CFDA number for this program is 21.027.

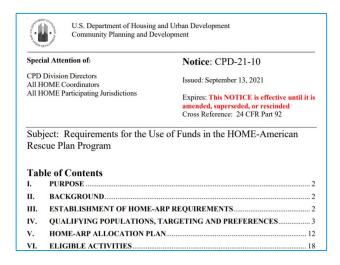
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Formula Funding Allocations and Program Guidance

Federal agencies must use formulas to determine what portion of program funding is available to each entity eligible to receive noncompetitive funding. Agencies post estimates of funding allocations, sometimes called apportionments or allotments, in a variety of formats. Allocations can be found attached to program notices; posted elsewhere on agency websites; and at times in the Federal Register, a daily compilation of Presidential proclamations, executive orders, federal agency regulations, proposed agency rules, and other documents.⁶

Federal agencies outline the necessary steps that eligible entities must take to receive funding in program guidance documents. The contents of guidance documents vary, but generally they outline eligible uses of grant funding and reporting requirements. Some programs have frequently asked questions documents to go along with program guidance. Program guidance might be published in notices, Dear Colleague Letters, or guidance letters.

Some grant programs have **matching requirements**, meaning state and local government recipients have to spend a certain amount of their own funding (not repurposed from other federal grants, for example) in proportion to the federal award. The grant program may also have a **maintenance-of-effort requirement**, where recipients must commit to keeping their own spending at prior-year levels to limit substituting federal dollars for state and local spending.



American Rescue Plan Act HOME Supplemental Allocations				
KEY	NAME	STA	AMOUN	
010228	Birmingham	AL	\$5,074,139	
011218	Huntsville	AL	\$2,706,32	
011542	Mobile	AL	\$3,083,624	
011560	Montgomery	AL	\$3,288,603	
012268	Tuscaloosa	AL	\$1,719,37	
019073	Jefferson County	AL	\$3,597,41	
019097	Mobile County	AL	\$2,190,30	
019999	AL Non Entitlement	AL	\$41,632,08	
01C983	CNSRT-Anniston	AL	\$1,454,48	
020078	Anchorage	AK	\$2,713,35	
029999	AK Non Entitlement	AK	\$4,983,46	
040270	Mesa	AZ	\$5,605,69	
040220	Dhooniy	A.7	¢21 2E4 77	

Above: front page of <u>implementation</u> <u>notice</u> for HOME-ARP program. Below: sample of HOME-ARP allocation table.

Finding Competitive Funding Opportunities

In addition to assistance listings, federal agencies are generally required to publicly announce competitive funding opportunities using a **Notice of Funding Opportunity (NOFO).** NOFOs provide application information in a standardized format, including specific eligibility rules, application requirements, contact information, and summary information provided in the assistance listing.⁷ Information about technical assistance may also be provided in NOFOs.

Federal agencies are required to post NOFOs on <u>Grants.gov</u>, a database and application portal managed by the Office of Management and Budget. Potential applicants may also find NOFOs published in the <u>Federal Register</u> or on agency websites.⁸ Users can refer to the Grants.gov version history to ensure that NOFOs published elsewhere are up to date. Grants.gov also provides thorough information on the federal grants process through its <u>Grants Learning Center</u>.

The results of competitive funding processes might be announced publicly, at the discretion of the award administrator.



TA-2021-008-TPM-BU

Fiscal Year 2021 Competitive Funding Opportunity; Grants for Department of Transportation

DOT/Federal Transit Administration

WATES OF PO		
GENERAL INFORMATION		
Document Type:	Grants Notice	
Funding Opportunity Number:	FTA-2021-008-TPM-BUS	
Funding Opportunity Title:	Fiscal Year 2021 Competitive Fund	
Opportunity Category:	Discretionary	
Opportunity Category Explanation:		
Funding Instrument Type:	Grant	
Category of Funding Activity:	Transportation	
Category Explanation:		
Expected Number of Awards:	125	
CFDA Number(s):	20.526 Buses and Bus Facilities	
Cost Sharing or Matching Requirement:	Yes	
Version:	Synopsis 1	
Posted Date:	Sep 20, 2021	
Last Updated Date:	Sep 20, 2021	
Original Closing Date for Applications:	Nov 19, 2021	
Current Closing Date for Applications:	Nov 19, 2021	
Archive Date:	Dec 19, 2021	
Estimated Total Program Funding:	\$409,590,000	
Award Ceiling:	\$40,590,000	
Award Floor:	\$0	
ELIGIBILITY		
Eligible Applicants:	State governments	
	Others (see text field entitled "Add Native American tribal government County governments City or township governments	
Additional Information on Eligibility:	Eligible applicants include designa	
Additional information on Litylblitty.	Indian tribes. Eligible subrecipients eligible recipients that receive grar nonprofit organizations engaged in	

Partial synopsis of competitive funding opportunity posted on Grants.gov. Note that this is the first version of this NOFO.

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Financial and Programmatic Reporting Requirements

The Federal Financial Accountability and Transparency Act of 2006 required the federal government to publish federal grants, contracts, and loans data on a publicly accessible website (GAO 2010). The Digital Accountability and Transparency Act of 2014 expanded and standardized the 2006 act's requirements across the federal government, linking grants expenditures to federal agency programs and imposing data quality standards. All federal agencies must report financial information at the award level, by federal budget categories, and by financial account to a centralized data system at the Treasury department. This includes **obligations**, or funding committed to award recipients, and **outlays**, funding disbursed to recipients (see slide 8).

These policies form the foundation of the reporting requirements that federal agencies attach to grant funds. Grant recipients must report their progress spending funds, including subgrants, contracts, and loans issued using grant funding. Some grants require that recipients outline the projects they propose to use grant funds toward and then report spending at the project level. States, local governments, and other entities receiving more than \$750,000 in federal awards for a given fiscal period must also file a single audit report including detailed financial information (Randall et al. 2018).

In addition to financial information, recipients must also submit programmatic reports to the grantmaking federal agency. The contents of these reports vary: recipients may be required to report items such as the demographic and geographic distribution of community members served by grant funds and the jobs created by grant-funded projects. Recipients may be asked to outline their own goals for grant-funded projects and how they plan to measure their performance in meeting those goals. Agencies describe program-specific reporting requirements in the program guidance documents that accompany a federal grant.

Spending Data

USAspending.gov

<u>USAspending.gov</u> is the official government grants data portal created by the Federal Financial Accountability and Transparency Act of 2006. The website compiles grants, contracts, loans, and other financial assistance provided by federal agencies to nonfederal entities dating back to the 2008 fiscal year. The website contains grants and loans of \$25,000 or more, loans of \$3,000 or more, and sub-awards, or pass-through funding that federal grant recipients have transferred to other entities. USAspending reports obligations and outlays made by federal agencies, not grant recipients. Despite some known data limitations, USAspending is a useful tool in many situations (Randall et al. 2018).

Search functions: the Spending Explorer section categorizes overall federal agency expenditures, and the Award Search allows users to filter federal awards and subawards by keyword, year, assistance type, CFDA number, recipient characteristics, and Disaster Emergency Fund Codes.¹⁰ Disaster Emergency Fund Codes identify awards that were funded by pandemic-related legislation.

Frequency: USAspending compiles funding from multiple federal data systems that update on different intervals. Agencies must report grants within two weeks, and their overall data submissions are due monthly. Grant recipients must report subawards each month. Users can reference Digital Accountability and Transparency Act Reporting Submission Dates in order to identify the time period covered by the most recent reporting submissions. 12

Data Quality on USAspending.gov

USASpending offers highly detailed data from multiple sources. Agencies' financial data submissions go through a certification process, and grant-level data must pass internal consistency validation tests. However, the Government Accountability Office has documented limitations in the quality of the data regarding its completeness and accuracy compared with audited agency records (GAO 2017, 2019, 2021).

Data quality has improved over time, but users should pay close attention to the known data limitations, which are also documented by USAspending. For example, the place of performance (where most of the grant-funded work is done) reported with Medicare grants reflects the location of Medicare administrators, not health care providers or Medicare beneficiaries.

PandemicOversight.gov and Other Federal Data

USASpending data support multiple government websites. <u>Data Lab</u> visualizes all federal spending. <u>COVID-19 Spending</u> displays total spending from COVID-19 pandemic relief bills by budget category and award spending by recipient, federal agency, and CFDA program/assistance listing. <u>PandemicOversight.gov</u> contains a high-level summary of all pandemic relief legislation and interactive dashboards with detailed information on recipients of funding from several CARES Act programs:

- Coronavirus Relief Fund (including expenditures by local subaward recipients)
- Paycheck Protection Program
- Provider Relief Fund (Hospitals and health care providers)

PandemicOversight.gov is the website of the Pandemic Response Accountability Committee. The Pandemic Response Accountability Committee is a watchdog created to monitor the use of funding from the CARES Act and the Families First Coronavirus Response Act. PandemicOversight.gov also hosts reports by federal, state, and local inspectors general and auditors on waste, fraud, and abuse in recovery programs (Teefy and Kreiser 2021).

Some federal agencies have opted to publish program-specific data on their own websites outside of requirements in the Financial Accountability and Transparency Act of 2006 and Digital Accountability and Transparency Act of 2014. See Appendix B for links to examples of these resources.

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Local Data

The availability of local-level grant spending data varies. Some cities have created interactive data tools specific to COVID-19 pandemic spending, but these are not necessarily organized by grant programs. Examples of city pandemic-spending dashboards include those made by Los Angeles, Chicago, and New York.

Community-based organizations and advocates can use several other strategies to access information on local spending. Certain federal grants programs require grant recipients to publish programmatic and financial reports publicly. Recipients of State and Local Fiscal Recovery Fund dollars with either a population or grant amount above a certain threshold must upload a copy of their program reports on their own websites. Researchers may be able to access reports that are not required to be publicly posted by submitting open records requests.

Nongovernment researchers can also establish data-sharing agreements with local government agencies. Before the pandemic, the University of North Carolina created a regional Integrated Data System that combines social services data from the city of Charlotte and Mecklenburg County (Wiseman 2021). The Recovery Data Partnership in New York City merges commercial and government data to track COVID-19 response activities and recovery metrics (Leger 2020).

Lastly, local governments often receive recovery funding in the form of pass-through grants from the state government. State fiscal data sources may shed light on the pass-through funding that local governments receive. At least 38 states collect and publish fiscal data from local governments to monitor fiscal health (Chapman and Ascanio 2020).

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External Resources

Many research institutions and professional membership organizations have analyzed the COVID-19 pandemic relief bills and summarized the relevant funding. Any of the resources listed here could be a useful starting point for general research before drilling down to specific grants. Resources analyzing state funding allocations are included because of the prevalence of pass-through funding to local governments.

- Committee for a Responsible Federal Budget COVID Money Tracker
- Drexel University Nowak Metro Finance Lab: American Recovery Resource Center
- Federal Funds Information to States analyses and grants database (subscription only)
- National Association of Counties (NACo) COVID-19 Clearinghouse
 - County Investments of American Rescue Plan Recovery Funds (collects links to county plans for fiscal recovery funds)
- National Association of State Budget Officers: COVID-19 Relief Funds Guidance and Resources
 - State and Territorial Recovery Plans
- National Conference of State Legislatures: How States are Spending their Stimulus Funds
- National League of Cities COVID-19 Pandemic Response & Relief
- United States Conference of Mayors—COVID-19: What Mayors Need to Know

References and Appendices

Notes

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- 6. "Federal Register Office," Federal Register, National Archives and Records Administration and U.S. Government Publishing Office.
- 7. 2 CFR 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards."

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- 9. Congressional Research Service. 2014. <u>S. 994, DATA Act.</u> 113th Cong. Congress.gov.
- For detailed guidelines on how to use USAspending, see Teefy (2021) and "<u>Analyst's Guide to Federal Spending Data</u>," *Data Lab*, Washington, DC: Bureau of the Fiscal Service.
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Appendix A: Selected Grant Programs

- CARES Act
 - Coronavirus Relief Fund
 - Community Development Block Grant (CDBG-CV)
 - Homelessness Assistance Grants (Emergency Solution Grants)
 - Economic Development Administration Recovery Assistance
 - Federal Transit Administration Grants (Urbanized Area Formula Program)
 - Child Care Development Block Grant
 - Grants in Aid for Airports
- Coronavirus Response and Recovery Supplemental Appropriations Act
 - Emergency Rental Assistance (ERA1)
 - Federal Transit Administration Grants (Urbanized Area Formula Program and Enhanced Mobility of Seniors and Individuals with Disabilities)
 - Surface Transportation Block Grant Program (STBGP)
 - Grants in Aid for Airports

- American Rescue Plan Act
 - Coronavirus State and Local Fiscal Recovery Funds
 - Federal Transit Administration Grants (Urbanized Area Formula Program, Enhanced Mobility of Seniors and Individuals with Disabilities, Intercity Bus, Capital Investments)
 - Emergency Rental Assistance (ERA2)
 - State Small Business Credit Initiative
 - Capital Projects Fund
 - Homeowner Assistance Fund
 - Expanding the Public Health Workforce
 - Homelessness Assistance & Supportive Services (HOME-ARP)
 - Economic Development Administration Grants (Build Back Better Regional Challenge; Good Jobs Challenge; Economic Adjustment Assistance; Travel, Tourism and Outdoor Recreation; Statewide Planning, Research and Networks; Coal Communities Commitment)
 - Head Start
 - Emergency Connectivity Fund for Remote Learning
 - LIHEAP
 - Grants in Aid for Airports

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Appendix B: Federal Agency Links

- A-Z index of US government departments and agencies
- Department of Education
 - Competitive programs
 - Programs by CFDA number
 - COVID Relief Data
 - Open data
- Economic Development Administration
 - Funding opportunities
- Federal Highway Administration
 - Apportionment and other notices
- Federal Transit Agency
 - Apportionments
 - Grant programs

- Health and Human Services
 - Tracking Accountability in Government Grants System (TAGGS): HHS grant data by recipient, recipient type, activity type, state, and agency operating division.

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- Housing and Urban Development
 - Competitive grant opportunities
 - Awards and allocations (HUD Exchange)
- Treasury
 - COVID-19 Economic Relief program pages
 - Emergency Rental Assistance monthly reports

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