CCM’s ARP Advisory Committee

The CCM ARP Advisory Service Committee was convened to provide municipal CEOs with an ongoing panel of public and private sector experts designed to best help administer funding from the American Rescue Plan. Along with developing best practice and resources for members, they will work on a case-by-case basis with CCM member municipalities to analyze and recommend the use of ARP funds.

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- **Brig Smith**, City of Middletown General Counsel and President, CAMA
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- **Gene Goddard**, Chief Business Investment Officer, METRO Hartford Alliance
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CCM ARP Advisory Committee
TOOLKIT 2.0

INTRODUCTION

Municipal leaders continue to determine how best to use the funding provided by the American Rescue Plan (ARP). Since May 2021, municipalities have been operating under Treasury’s “interim final rule.” The rule provided a framework to assist local governments to address the public health emergency, address negative impacts to households and business and make investments in water, sewer and broadband projects. However, the interim rule lacked clarity and specificity in several areas. On January 6, 2022, Treasury released the Final Rule for the Coronavirus State and Local Fiscal Recovery Funds (SLFRF) of the American Rescue Plan Act. The final rule provides clarity and broadens in select categories, eligible uses. The rule takes effect April 1, 2022, however it does afford local officials to take advantage of any new provision prior to the effective date.

The ARP program offers a great opportunity for local leaders to engage partners in their town and region to jumpstart a long and large economic recovery from the Covid-19 pandemic and its effects. It also lets us address long-term issues that haven’t been adequately dealt with before, while balancing ever-changing local needs with declining support from the state and federal governments.

Following the publishing of the interim rule, CCM’s ARP Advisory Committee developed a toolkit to help be a resource and provide thinking into eligible uses. This toolkit v2.0 is intended to reflect the provisions in the final rule, along with providing greater examples and resources that have been developed over the past several months.

This toolkit is intended to be a resource and supplement formal information from the Department of Treasury. These documents include, among others, the SLFRF Final Rule, Compliance and Reporting Guidance, and Frequently Asked Questions (FAQ) document, which is routinely updated.

OVERVIEW OF ARP

The final ARP plan allocated $65.1 billion to municipalities throughout the country. Connecticut towns and cities will be receiving $2.55 billion statewide, with $1.56 billion to general government and an additional $995 million to boards of education. In regards to allocation distribution, funding for general government will be distributed in a modified CDBG formula with entitlement cities (those with a population over 50,000) receiving funding directly from the Treasury Department and non-entitlement towns (those with a population under 50,000) distributed by the State as a passthrough.

Local governments will receive allocations in two tranches—the first half 60 days after enactment and the other half one year later (first tranche
received Spring 2021 and second received Spring 2022). For non-entitlement units of local government, those deadlines are the dates for Treasury to send the funding to the state, which has an additional 30 days to distribute to each non-entitlement unit of local government. The county funding will also be distributed in two tranches, likely around the same time period as non-entitlement towns as the state will be distributing the county allocations.

Generally, the funds are to be used for costs incurred on or after March 3, 2021. (The exception is in regards to premium pay.) The funds must be “obligated” by December 31, 2024 and “liquidated or expended” by December 31, 2026.

States have no discretionary authority to change the amount of, or attach additional requirements to, the payments allocated to local governments.

Along with the SLFRF, Connecticut has received $1.105 billion statewide for education purposes. Of the total amount, 90% ($995 million) will be distributed to Local Education Agencies (LEAs) – school districts. Board of Education have their own set of resources and guidance regarding eligible uses. (This toolkit is associated only with the SLFRF program, and not the education program).

ELIGIBLE USES

In general, the final rule reiterates that the funds can be used in five broad categories; (1) responding to the public health emergency and the negative economic impacts of COVID-19; (2) replacement of loss revenue; (3) premium pay; (4) water and sewer infrastructure; and (5) broadband infrastructure. Unless appropriating funds within the premium pay category, generally funding under ARPA is prospective in nature, with eligible cost being those that occurred after March 3, 2021.

Treasury’s key objectives with the funding are to:

- Fight the pandemic and support families and businesses struggling with its public health and economic impacts;
- Maintain vital public services, even amid declines in revenue resulting from the crisis;
- Build a strong, resilient, and equitable recovery by making investments that support long-term growth and opportunity.

RESPONDING TO THE PUBLIC HEALTH EMERGENCY AND THE NEGATIVE ECONOMIC IMPACTS OF COVID-19

The final rule provides clarity and specifies additional examples of projects eligible under this category and includes several sub-categories:

- public health,
- assistance to households,
- assistance to small businesses,
- assistance to nonprofits,
• aid to impacted industries, and
• public sector capacity.

It is important, when allocating funds in this category to (1) identify the particular sub-category, (2) identify what individual/class that was impacted because of COVID-19, and (3) what and how the project or service will address the harm experienced. Each sub-category includes a non-exhaustive list of particular individuals or groups that the final rule presumes to have been impacted by the pandemic. In addition, there are specified eligible projects that can be allocated to assist those impacted, which are referred to as “enumerated” projects and services.

In addition, the final rule provides a two-step framework to determine how unenumerated projects could be eligible. Those projects that are unenumerated may generally be eligible if a (1) COVID-19 public health or economic impact can be identified, and (2) the ARP funds will respond to that impact. Treasury has indicated that the responses needs to be related and reasonably proportional to the harm (i.e. the scale of the response needs to be compared to the scale of the harm experienced). Greater detail on appropriating funds for unenumerated projects can be found at the end of this section.

Public Health

As towns and cities continue to respond to the public health needs associated with COVID-19, Treasury has identified several public health impacts and projects to address those harms. (Specific enumerated eligible uses under this category are detailed in appendix 1.)
• **COVID-19 mitigation and prevention** – Funding can be provided towards any COVID-19 prevention or mitigation service and specifically for the general public, small businesses, nonprofits or impacted industries.

• **Medical Expenses** – Funding can be provided to households, medical providers or EMS for the medical costs associated with the pandemic.

• **Behavioral health** – As the pandemic has not only imposed a physical impact on individuals, it has also had a broad behavioral and emotional impact. As a result, funding can be provided towards mental health treatment, substance abuse treatment and other health services that have been impacted because of COVID-19 as the pandemic.

• **Preventing and responding to violence** – Violence, especially gun violence, has increased in some communities during the pandemic. Funding in this sub-category can be allocated in the broad areas of (a) referrals to trauma recovery service for victims of crime; (b) community violence intervention programs; and (c) communities experiencing increased gun violence due to the pandemic.

**Appendix 1** lists the varying projects and programs enumerated to address public health response.

### Assistance to Households

The final rule recognizes that the pandemic caused broad impacts to a variety of individuals and communities. In doing so, it distinguishes between those “impacted” and “disproportionately impacted.” Specifically, “impacted” households are those:

- Low-or-moderate income households
  - Those with an income at or below 300% of the Federal Poverty Guidelines for the size of the household (broader and likely will increase eligible households), or
  - Those with an income at or below 65% of the area’s median income.

- Households that experienced unemployment

- Households that experienced increased food or housing insecurity

- Households that qualify for CHIP, CCDF, or Medicaid

“Disproportionately impacted” households are those defined as:

- Low-income households and communities
  - Those with an income at or below 185% of the Federal Poverty Guidelines for the size of the household (broader and likely will increase eligible households), or
Those with an income at or below 40% of the area’s median income.

Tool for Determining Low and Moderate Income (LMI) Households provides a spreadsheet to assist recipients in determining income thresholds.

- Households resident in Qualified Census Tracts (QCTs)
- Households that qualify for certain federal benefits (ex. TANF, SNAP, Medicare Part D, SSI, WIC and LIHEAP.)

Those individuals and households that receive direct funding are considered “beneficiaries.”

Appendix 1 lists the varying enumerated projects and programs for those households that have been impacted and/or disproportionately impacted because of COVID-19.

Assistance to small businesses

Funding can be provided to small businesses that experienced a negative economic impact or disproportionate impact caused by the pandemic. Small businesses are those that (1) have less than 500 employees, and (2) considered a small business as defined in section 3 of the Small Business Act (15 U.S.C. 632).

The type of enumerated projects is dependent on whether the business was “impacted” or “disproportionately impacted” due to the pandemic.

Small businesses that were impacted by the pandemic are those that experienced:

- Decreased revenue or gross receipts
- Financial insecurity
- Increased costs
- Difficulty weathering financial hardship
- Challenges covering payroll, rent, mortgage or other operating costs.

Small businesses that were disproportionately impacted by the pandemic are generally those that operate within a QCT.

A business that receives direct assistance for a harm that was caused by the pandemic is considered a “beneficiary.” A municipality can provide the funding to a small business or non-profit to execute eligible ARPA projects. In those instances, the business or non-profit are considered a “subrecipient”. While the nonprofit needs to adhere to requirements associated with the ARPA program, the municipality is ultimately responsible for reporting information to Treasury and must collect any necessary information from their subrecipients to complete required reporting.

Appendix 1 lists the varying projects and programs enumerated to address public health response.
**Assistance to Nonprofits**

Nonprofits experienced unique challenges due to the pandemic, from increase demand for services, changes to operations and decline in revenue. Treasury defines eligible nonprofits as those that are 501(c)(3) or 501(c)(19).

The type of enumerated projects is dependent on whether the nonprofit was “impacted” or “disproportionately impacted” due to the pandemic. Nonprofits that were impacted by the pandemic are considered those that experienced:

- Decrease in revenue
- Financial insecurity
- Increased costs
- Difficulty weathering financial hardship
- Challenges covering payroll, rent, mortgage or other operating costs.

Each municipality may determine that certain nonprofits were impacted or disproportionately impacted by the pandemic and provide responsive services.

The final rule details how nonprofits can carry out eligible uses of funds on behalf of the municipality as a “subrecipient” (e.g., assisting in a vaccination campaign, operating a job training program, developing affordable housing). When a municipality provides funds to an organization to carry out eligible uses and serve beneficiaries, the nonprofit does not need to have experienced a negative economic impact in order to serve as a subrecipient.

When a nonprofit entity is considered a subrecipient, they must adhere to requirements associated with the ARPA program. The municipality is ultimately responsible for reporting information to Treasury and must collect any necessary information from their subrecipients to complete required reporting.

**Appendix 1** lists the varying projects and programs enumerated to address public health response.

**Assistance to Impact Industries**

The final rule elaborates on how funding can aid particularly impacted industries as a result of COVID-19. In allocating funds in this subcategory, municipalities will need to (1) designate an impacted industry, and (2) provide aid to address the negative impact that was caused to that industry.

Two ways an industry can be designated as impacted:

1. It is an industry related to travel, tourism or hospitality, or
2. It is an industry (outside of travel, tourism and hospitality) that experienced (a) at least 8% employment loss from pre-pandemic levels or (b) comparable or worse economic conditions as the national average for the travel, tourism and hospitality industries (which would need to be substantiated through data).
Providing aid to those impacted industries are only reserved for those businesses that existed prior to the pandemic (i.e. funds cannot be used for new business development in this industry). In addition, the final rule details that the aid should be provided broadly to all businesses within the impacted industry (within your municipality) and should first be used on operational expenses (ex. payroll) prior to other costs.

**Improving Public Sector Capacity**

Funds can be used to restore and support public sector employees and services, which is intended to strengthen local governments ability to deliver critical services as they relate to COVID-19 response. The specific investments can be made in the following areas:

1. **Provide payroll and covered benefits for public safety, public health and human service staff for their time spend on COVID-19 response.** *(Specific staff are referenced in Appendix 2).*
   
   Local officials must assess the portion of time that they spent responding to COVID-19 by reasonably estimating, based on available information and discussion with staff, for their work that was “primarily dedicated” to responding to COVID-19. “Primarily dedicated” means that more than half of the employee’s time was spent responding to COVID-19. Once determined, the ARPA funding can be used for the payroll and covered benefits for the identified staff.

2. **Restoring and retaining public sector staff**
   
   Eligible uses include (a) hiring up to pre-pandemic levels and supporting and (b) retaining public sector workers.
   
   When using the funds to restore employment to pre-pandemic levels, municipalities can either: (1) hire back the employees to their pre-pandemic position that existed on January 27, 2020, but went unfilled or eliminated during the pandemic, or (2) hire above pre-pandemic levels or modify positions. If the municipality would like to hire above pre-pandemic levels, they are allowed to increase the number of budgeted full-time equivalent employees up to 7.5% above its pre-pandemic baseline they would need to undergo a four-step analysis to allow hiring staff above a pre-pandemic baseline by adjusting based on historical growth rates *(The process is detailed in Appendix 3).*

3. **Effective service delivery**
   
   Funds can be used to address additional administrative costs caused or exacerbated by the pandemic, provide enhanced mechanisms for the public to engage in local government, and improve efficacy of public health and economic programs. *(Specific eligible uses can be found under Appendix 1).*

**Capital Expenditures**

The final rule clarifies how funds can be used for capital expenditures that respond to public health needs or address a negative economic impact caused by COVID-19. Specifically, the expenditure must be related
and reasonably proportional to the impact identified and reasonably designed to benefit an impacted group. The final rule enumerates a variety of capital projects eligible (under public health and addressing negative economic harm sub-category sections and referenced in Appendix 1).

Other capital expenditures in this category may be eligible, however may need written justification to determine eligibility. In general, if the capital expenditure is less than $1 million, it is presumed proportional, provided that it is responding to a harm caused or exacerbated by COVID-19. Further details regarding reporting can be found in the table.

<table>
<thead>
<tr>
<th>Total capital expenditure</th>
<th>Expenditure enumerated in FR</th>
<th>Expenditure unenumerated in the FR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $1 million</td>
<td>No written justification required</td>
<td>No written justification required</td>
</tr>
<tr>
<td>Greater than $1 million but less than $10 million</td>
<td>Written justification required, but not required as part of regular reporting</td>
<td>Written justification required and must be submitted as part of regular reporting</td>
</tr>
<tr>
<td>Greater than $10 million</td>
<td>Written justification required and must be submitted as part of regular reporting</td>
<td></td>
</tr>
</tbody>
</table>

Written justification will need to include a variety of information, in particular:

1. **Description of the harm, or the need, that will be addressed with the capital purchase.** This should include quantitative information on the extent and type of harm that was impacted on a specific group or entities.

2. **Explanation as to why capital expenditure is appropriate.** This should include an explanation as to why existing capital is inadequate to address the harm. In addition, how additional funding to applicable programs or services would be insufficient without the corresponding capital purchase. Part of this explanation may include that other interventions may be inefficient or too costly.

3. **Compare capital project against at least two alternative capital expenditures.** The alternatives should be relevant in type, size and potentially delivery similar effective and feasible results. This may include improving existing capital assets. This review should include why the proposed capital project is superior to the alternatives by utilizing qualitative and narrative descriptions, and when applicable quantitative data.

Presumed ineligible projects:

- Construction of new correctional facilities as a response to an increase in crime
- Construction of new congregate facilities to decrease spread of COVID-19 (in most instances, the final rule references as an alternative to invest in capital expenditures to increase air quality or other efforts in existing facilities).
• Construction of convention centers, stadiums, or other large capital projects intended for general economic development or to aid impacted industries

The final rule promotes the use of “strong labor standards” if engaging in capital expenditures.

**Determining Eligible Uses Beyond Those Enumerated**

While the final rule details a variety of enumerated eligible projects, it is not an exhaustive list. Local officials can appropriate ARPA funds towards unenumerated projects and still be eligible under the program if the following steps can be substantiated.

1. Identify a public health or negative economic impact that was caused or exacerbated due to COVID-19.
2. How will the ARPA funds will address or respond the impact needs. Specifically, the program or services needs to be related and “reasonably proportional” to the extent and type of impact experienced. (i.e. the scale of the response needs to be compared to the scale of the harm experienced).

When doing so, consider the following:

- Identify whether they were “impacted” or disproportionately impacted” (which is defined in the Appendix 4 – Common Definitions).
- If assisting individuals, provide documentation supporting how they were negatively impacted, which can be achieved through self-attestation from an individual or household.
- Broad flexibility to identify a “class” – group of individuals, households, businesses – that experienced an impact. This distinction can be made on a population or geographic basis. When identifying a class, there needs to be a correlation between the class and the proposed response. Once the class and members are substantiated, the only documentation is needed that those individuals fall within the class.
- Some enumerated uses may be an appropriate response to other not distinguished as “impacted” or “disproportionately impacted” classes, can be eligible if local officials are able to substantiate that the response is also appropriate for the other group or class. This may include assisting households in the higher income levels than what the final rule has allowed. Again, the local official will need to substantiate that the response is also appropriate for the other households.

**REPLACING LOST REVENUE**

The final rule provides greater clarity and eligibility to identify revenue loss. Specifically, each municipality can choose one of two options (note, both and cannot switch once initially selected).

1. Select a “standard allowance” of $10 million
2. Calculate their actual revenue loss according to the treasury develop-
oped formula. The specific formula is articulated in the final rule, however a simplified explanation can be found in the diagram:

![Diagram of the revenue formula](image)

In calculating revenue using the formula, recipients should sum across all revenue streams covered as general revenue. This would include gross revenue of facilities operated by a government (swimming pools, recreational marinas and piers, golf courses, skating rinks, museums, zoos, etc.); and auxiliary facilities in public recreation areas (camping areas, refreshment stands, gift shops, etc.); lease or use fees from stadiums, auditoriums, and community and convention centers; and rentals from concessions at such facilities. When reporting, you will likely need to classify the various types of revenue.

**Excluded Revenue Sources:**

- Refunds and other correcting transactions
- Proceeds from issuance of debt or the sale of investments
- Agency or private trust transactions

Recipients may provide data on a cash, accrual, or modified accrual basis, provided that recipients are consistent in their choice of methodology throughout the covered period and until reporting is no longer required. In addition, the final rule provides greater latitude in choosing between a calendar or fiscal year when making calculation, however the metric needs to be consistent throughout the period of the program.

If selecting the standard allowance, up to $10 million may be used towards government services. Selecting the standard allowance does not permit exceeding your award amount. This includes your total allocation, including direct and county portion of your ARPA funding.

Generally, government services include any service that is traditionally provided by a government for their residents (unless stated otherwise or prohibited). A non-exhaustive list of capital project infrastructure investments - that would funded through taxes, fees, or other government sources - that would be eligible, include:

- Construction of schools
- Road construction and maintenance
- Environmental remediation
• Police, fire or other public works or safety purchases (including fire trucks and police vehicles).

When appropriating funds under the revenue loss category (whether through the formula or selecting the standard allowance), reporting will require an explanation of how the funds were allocated to government services. Local governments will need to make an irrevocable decision as to whether it will take the $10 million standard allowance or use the lost revenue calculation in their April 30, 2022 report. A sample of the revenue replacement screen that will be found when submitting the Project and Expenditure Report, is referenced below:

**PREMIUM PAY**

The ARPA funding may be used to provide premium pay for eligible essential workers, in addition to the existing wages and compensation that the employee already receives. For those eligible, workers can be paid up to $13 per hour, and may not exceed $25,000 in the aggregate of the program. Unlike other categories, premium pay can be provided retroactively for work completed prior to March 3, 2021 that were associated with responding to the pandemic.

In order to provide premium pay, the following needs to be considered: (1) identify an “eligible” worker, (2) verify the worker performs essential work, and (3) confirm that the premium pay “responds to” workers performing essential work during the pandemic.
Determining eligible workers:

The final rule specifically references a list of eligible workers and occupations (referenced in Appendix 4). Beyond the list, the local CEO does have the ability to designate additional workers by verifying that the worker performs “essential work.” Eligible workers are those that were “needed to maintain continuity of operations of essential critical infrastructure sectors.” The employee may be paid hourly, part-time, or salaried. Premium pay cannot be paid to volunteers.

What is “essential” work:

Once the eligible worker has been identified, it needs to be substantiated that the work conducted was “essential”. Specifically, the final rule details that essential work:

- Can’t be performed while teleworking from home.
- Their work involves either regular interaction with the public and coworkers, or they were physically handling items that were handled by the public and coworkers.

Determine pay “responds to” the performing of essential work:

The premium pay “responds to” the workers performing the essential work during the pandemic by reviewing the wage threshold the worker typically receives. This was modified from the interim rule to expand upon these thresholds. As a result, there are two options to substantiate that the premium pay responds to the worker’s needs, without providing written justification:

1. Eligible worker is earning (with the premium pay included) at or below 150% of the state’s average annual wage for occupations. For Connecticut, this is $65,450 per year.
2. Eligible worker is not exempt from the Fair Labor Standards Act overtime provisions. This is a test that employees routinely apply, additional information can be found here: FLSA Fact Sheet.

If either of the requirements are not met, written justification needs to be provided detailing how the premium pay is otherwise responsive to workers performing the essential work. This should include a list of the workers duties, health and financial risks that were faced due to COVID-19, as well as “why” the premium pay was responsive to their work. In addition, confirming that the worker was exempt from overtime provisions.

When providing premium pay, it can be awarded in installments or lump sums. It may be awarded retroactively for work completed since the beginning of the pandemic, however cannot be used to reimburse local funds for premium pay or hazard pay that was already provided. In addition, the final rule prohibits elected officials from paying themselves premium pay.
WATER AND SEWER INFRASTRUCTURE

The final rule maintains that eligible water and sewer projects are those that would be eligible under EPA’s Clean Water State Revolving Fund (CWSRF) and EPA’s Drinking Water State Revolving Fund (DWSRF). These eligible uses have been consistent since the IFR and a full list of eligible projects can be found in the EPA’s handbook for these projects under the CWSRF or DWSRF (excerpt can be found in Appendix 5).

In addition, the final rule broadens eligibility to other projects beyond those in the two EPA programs, including additional stormwater infrastructure (such as culvert repair, resizing, and removal, replacement of storm sewers, and additional types of stormwater infrastructure), residential wells, lead remediation efforts, and certain rehabilitations to dams and reservoirs.

Those unenumerated in the CWSRF or DWSRF may be eligible if they are determined to be a “necessary” investment in infrastructure. In general, the projects must be responsive to an identified need to achieve or maintain an adequate minimum level of service. This can be achieved determining that the project is:

• Responsive to an identified need to achieve or maintain an adequate minimum level of service, which may include a reasonable projection of increased need, whether due to population growth or otherwise;
• A cost-effective means for meeting that need, considering available alternatives; and
• For investments in infrastructure that supply drinking water in order to meet projected population growth, projected to be sustainable over its estimated useful life.

While the final rule does provide greater latitude in eligible water and sewer projects, there are specific ineligible projects. In particular, the funds cannot be used to assist for-profit noncommunity water systems, acquisition of water rights, laboratory fees for routine compliance and monitoring, general flood plan management outside of EPA programs, as well as normal operation and maintenance of water or sewer facilities.

The final rule promotes the use of “strong labor standards” if engaging in water and sewer projects.

BROADBAND INFRASTRUCTURE

The final rule broadens the eligible broadband investments that can be used for ARPA. The interim rule designated that investments in this category must be made to serve those lacking reliable 100/20 mbps broadband service. The final rule provides greater latitude by articulating that investments to address these thresholds should be “encouraged.”

Specifically, the rule allows local governments the ability to provide service to locations with an identified need for additional broadband investment. This “need” would address a lack of (a) access to reliable broadband connection, (b) affordable broadband, or (c) reliable service.
In addition, if making an investment in locations where there are current speeds of 100/20 mbps, local officials must ensure that the funds for additional broadband investment are not met by existing federal or state commitments.

Broadband investments should meet high-speed standards of symmetrical speeds of 100 mbps. The final rule does allow exceptions to this standard if it is impractical due to excessive costs or geography. However, they need to be scalable for future investments. In addition, the final rule encourages broadband networks that are owned/operated or affiliated with government, nonprofits and co-ops, to be prioritized.

Other eligible broadband projects detailed in the final rule include:

- Subsidies to households impacted by the pandemic to assist them in connecting to the internet. In order to be eligible, the household must either (a) participate in the FCC’s Affordable Connectivity Program (ACP), or (b) be provided access broad-based affordability program to low-income consumers that provides benefits similar to the ACP.
- Digital literacy programs and device purchase programs.
- Investments in the “middle mile.”
- Provide necessary investments in cybersecurity, including modernization of hardware and software, for existing and new broadband projects – regardless of the speed delivered. (Broader cybersecurity can also be eligible under “government service” through the revenue loss category).

The final rule promotes the use of “strong labor standards” if engaging in broadband infrastructure projects.

**RESTRICTIONS ON USE OF FUNDS**

The final rule reaffirms that ARPA funds cannot be used to:

- Deposit into pension funds,
- Pay debt services
- Replenish reserves or rainy-day funds
- Satisfy obligation of settlement agreements, legal judgements, or consent decree
- Undermine COVID-19 mitigation or response practices

**ADMINISTRATION, COMPLIANCE AND REPORTING**

The final rule maintains most of the administration, compliance and reporting requirements that have been articulated in the interim rule or Treasury’s Compliance and Reporting document. In particular, Treasury has urged municipalities in their administration of ARPA funding to ensure *strong financial control mechanisms* are in place within local government. These internal controls include written policies and proce-
dures, written standards of conduct, risk-based compliance monitoring and record maintenance and retention.

In implementing these controls, the final rule reiterates that ARPA funds can be used to cover costs associated with administering the program, which could include costs of consultants for ensuring compliance, “direct costs” (i.e. those identified to implement the program objectives, such as contract support, materials and supplies) and “indirect costs” (i.e. general overhead costs, such as facilities and office space).

**Going forward, Connecticut municipalities will need to complete a “Project and Expenditure Report.”** The timeliness of when the report needs to be submitted is dependent on the type of municipality: either metropolitan or non-entitlement unit (NEU) of government.

- **Metropolitan cities and NEU’s that received more than $10 million in ARPA funds***. (quarterly Project & Expenditure Report) by January 31, April 30, July 31, and October 31.
  *These likely include Enfield, Shelton, Glastonbury, Southington, Torrington, Trumbull and Wallingford

- **NEU’s that received less than $10 million total ARPA funds** (annual Project & Expenditure Report) by April 30.

Accurate and timely reporting will be essential to ensure compliance and maintain adherence to the eligible rules. Required information in the Project and Expenditure Report:

- **Detail Project:** Need to provide name, expenditure category (*detailed in Appendix 6a*), description (50-250 words to detail the activities that will occur as they align to the common purpose of the program), and status of completion

- **Expenditures:** Provide specific amount of obligation and expenditures, including current obligation/expenditures, and anticipated cumulative obligation/expenditures.

- **Project Status:** Once a project begins, each recipient will need to report during each reporting period the status. Specifically, whether it has (a) not started, (b) less than 50% completed, (c) at least 50% completed, and (d) completed.

- **Subawards:** If awarding grants or loans that exceed $50,000, the local government will need to provide specific information regarding the award and subrecipient. (The details are outlined in Appendix 6b.)

- **Civil Right Compliance:** Ensuring compliance with the Title VI of the Civil Rights Act.

- **Specific Program Data:** The type of information collected will be based upon the expenditure category that is being funded. The specific information required is outlined in Appendix 6c.)

**Subrecipients**

As detailed in the final rule and throughout the toolkit, local governments are allowed to award funds to subrecipients to provide services
to other end users. For example, a municipality may provide a grant to a nonprofit to provide eligible services to eligible impacted groups or individuals. In this case, the subaward to a nonprofit is based on the services that the local government would have provided, and rather the the subrecipient is providing services on their behalf. In this instance, the nonprofit does not need to have experienced an impact from COVID-19.

Local governments are required to manage and monitor their subrecipients to ensure compliance with requirements of the APRA program. In doing so, local government must clearly inform the subrecipient that they are (1) responsible for compliance requirements, and (2) must adhere to all reporting requirements.

Local governments will need to evaluate each subrecipient's risk of noncompliance based on a set of common factors. These risk assessments may include factors such as prior experience in managing federal funds, previous audits, personnel, and policies or procedures for award execution and oversight. Ongoing monitoring of any given subrecipient should reflect its assessed risk and include monitoring, identification of deficiencies, and follow-up to ensure appropriate remediation. Accordingly, your municipality should rely upon the written ARPA financial control mechanisms and procedures for subrecipient monitoring, risk assessment, and maintain records of all award agreements identifying or otherwise documenting subrecipients’ compliance obligations.

**Matching Funds**

The final rule details that ARPA may be used as a match for other funding opportunities. If using as a non-federal cost-share or matching requirements of other federal programs, they must be used under the “revenue loss” eligible use category. However, note that funds may not be used as the nonfederal share for purposes of a state’s Medicaid and CHIP programs. The funds beyond those that are available under the revenue loss eligible use category may not be used as a match.

**Pooling funds**

Pooling funds for particular projects are allowed, but need to be done in a manner to ensure recipients actually receive a benefit from the project (i.e. can’t fund an entire project where the municipality doesn’t receive at least partial benefit).

**Non-compliance**

Failure to adhere to the provisions of the final rule or any other requirements associated with the ARPA program, may result in Treasury’s recuperation of individual funds. The formal process for recuperation would include Treasury providing written notice explaining the potential violation and allow the municipality the ability to articulate or remedy the malfeasance. However, Treasury does not need to adhere to this process in egregious situations.
BASIC FOUNDATIONS AND BEST PRACTICES

Follow allowable uses under ARP. As Treasury provides greater clarity on how and where the funds can be spent, cities and towns should adhere to the rules. Due to the sheer number of recipients, Treasury does not have the capacity to review each project for eligibility prior to execution. Failure to adhere to the eligible uses may result in recupera-
tion of funds by Treasury.

Meet all accounting and reporting rules. Make sure you have the sys-
tems in place to track and inform our federal partners of how well you are using your ARP funds. Reporting will be through the federal DUNS system and likely support by the state. Entitlement/metropolitan cities will need to provide quarterly reports, and non-entitlement towns will need to provide annual reports. More details regarding reporting details should be forthcoming.

Comply with all local and state laws and ordinances. In addition to federal rules, your ARP processes should be integrated with all other accounting, appropriation and audit requirements. For instance, many water or sewer investments may need to comply with DEEP and or DPH regulations.

Ensure transparency throughout. The public and media will want to know how these funds are being used, especially those that are not subject to appropriation. Consider creating an ARP dashboard, making it easy for everyone to see the uses of the funds, and who is benefiting.

Do not create future budget deficits. The ARP is one-time funding, and it should be treated as such. Do not use the funds in collective bar-
gaining contracts, for example, as this would lead to shortfalls in future years. Even premium pay should be closely scrutinized, as any pension-
able benefits would increase unfunded liabilities for years to come, erod-
ing available resources for essential services. Since the funds need to be “obligated” by December 2024 and spent by December 206, recognize that the funding commitments should end then, too.

Try to solve something well, don’t try to solve everything. The ARP is a large plan, but it could be spread very thin across a set of uncoordi-
nated priorities and actors on the local level. With the sheer amount and variety of federal funding it is tempting for local leaders to get over-
whelmed. It is equally tempting to try and focus on pulling down every last bit of federal funding from every nook-and-cranny of the federal government. With limited staff time and unlimited local needs, this is a recipe for failure.

Rather than trying to do everything, local leaders should establish a clear set of three-to-five priority goals they hope to achieve with ARP funding. These can draw from previous strategic plans or gap assess-
ments that emerged from the crises of the past year.

Provide services and programs to for immediate impact: Families, non-profits and businesses are hurting. Businesses need capital to reopen doors, and people need outreach and skills development to match them to available jobs, and non-profits need resources and capital to help their
constituents. While it is important to consider an investment’s impact beyond the immediate term, providing such immediate help is a necessary baseline for a longer-term recovery.

**Use existing delivery channels for efficiency:** It would be prudent to spend your aid on direct assistance, programs and investments, rather than using precious resources to create new offices or delivery systems. If that means working with outside partners, including nonprofits or nearby communities that are already engaged in the work so you can leverage their systems, that would be a best-practice move.

**Invest for future prosperity:** Localities will receive two ARP disbursements over a year, but they have until the end of 2026 to spend all the funds. Local leaders thus have a chance to invest in future growth and prosperity, the impacts of which will extend beyond near-term expenditure needs.

Municipalities throughout Connecticut – rural, suburban and urban – are in the process of developing economic programs to provide grants to businesses to revitalize main streets. The goal is these investments will spur greater economic growth for these businesses and then the municipality as a whole.

**Complement existing efforts:** Ideally, ARP investments can boost strategies already in progress.

This effort includes, coordinating with state and federal programs. The state is using its federal aid and its own resources to address a wide range of urgent needs, such as rent and mortgage relief, small business relief, support for child care, access to public transportation, and much more. Work closely with the state and your COGS to complement each other. If businesses and residents in your community already qualify for state funding, look at ways you can augment this or repurpose your aid to address community needs in other ways, rather than spending resources unnecessarily.

**Convene all stakeholders and build consensus.** Decisions on how to spend ARPA funds will likely be concentrated in the hands of municipal CEOs, but the power to act should not short-circuit an open process to bring all stakeholders in the community together to engage in dialogue about needs, resources and priority-setting, including government colleagues, nonprofits, businesses and others. True engagement and listening will minimize friction and encourage collaboration over ARP’s three-and-a-half-year lifespan.

Some examples of those that should be convened at the local level include:

- Boards of Selectman
- Chambers of Commerce (and other economic development groups or commissions)
- Local non-profits (in particular those focused on housing and food assistance)
- Local tourism groups
- Municipal attorney or legal counsel (to ensure compliance)
• Public health officials
• Local Internet Service Providers (ISPs)
• Public works and/or water and sewer officials
• Councils of Government (COGs)

**Be organized and transparent:** Beyond the ARP at the very local level, drawing Long-Term Recovery Committees, these can execute strategic investments and monitor impact. These councils should be public/private partnerships that include small businesses, neighborhood leaders, social service agencies, philanthropic leaders, and corporate heads. They would be tasked with aggregating and supplementing existing recovery plans, setting goals, recommending investments, and tracking results. Furthermore, these Committees can serve as a unified voice to liaise with implementing agencies.
CCM ARP Advisory Committee Toolkit 2.0

~APPENDICES~
Appendix 1 – Enumerated eligible uses

Public Health

• COVID-19 Mitigation and Prevention
  o Vaccination programs, including vaccine incentives and sites;
  o Testing programs, equipment and sites;
  o Monitoring, contact tracing & public health surveillance (e.g., monitoring for variants);
  o Public communication efforts;
  o COVID-19 prevention and treatment equipment, such as ambulances;
  o Medical and PPE/protective supplies;
  o Support for isolation or quarantine;
  o Ventilation/HVAC system installation and improvement (improve air quality);
  o Support for prevention, mitigation, or other services in congregate living facilities, public facilities, and schools;
  o Support for prevention and mitigation strategies in small businesses, nonprofits, and impacted industries.
- Technical assistance on mitigation of COVID-19 threats to public health and safety;
- Transportation to reach vaccination or testing sites, or other prevention and mitigation services for vulnerable populations
- Financial assistance to medical facilities for the treatment, mitigation and equipment associated with COVID-19 response.

- Medical Expenses
  - Unreimbursed expenses for medical care for COVID-19 testing and treatment, such as uncompensated care costs for medical providers or out-of-pocket costs for individuals
  - Paid family and medical leave for public employees to enable compliance with COVID-19 public health precautions
  - EMS response expenses
  - Treatment of long-term symptoms or effects of COVID-19.

- Behavioral health
  - Prevention, outpatient treatment, inpatient treatment, crisis care, diversion programs, outreach to individuals not yet engaged in treatment, harm reduction and long-term recovery support;
  - Enhanced behavioral health services in schools;
  - Support for equitable access to reduce disparities in access to high-quality treatment;
  - Peer support groups, costs for residence in supportive housing or recovery housing; and
  - Expansion of access to evidence-based services for opioid use disorder prevention, treatment, harm reduction, and recovery
  - Behavioral health facilities and equipment

- Preventing and responding to violence:
  - Evidence-based practices like focused deterrence, street outreach, violence interrupters, and hospital-based violence intervention models, complete with wraparound services such as behavioral therapy, trauma recovery, job training, education, housing and relocation services, and financial assistance;
  - Capacity-building efforts at community violence intervention programs like funding more intervention workers, increasing their pay, providing training and professional development for intervention workers, and hiring and training workers to administer the programs.
  - Responding to an increase in gun violence associated with the pandemic (for those communities that experienced an increase in gun violence), specifically:
    - Hiring law enforcement officials – even above pre-pandemic levels – or paying overtime where the funds are directly focused on advancing community policing strategies for gun violence,
    - Additional enforcement efforts to reduce gun violence exacerbated by the pandemic, including prosecuting gun traffickers, dealers, and other parties contributing to the supply of crime guns, as well as collaborative federal, state, and local efforts to identify and address gun trafficking channels,
    - Investing in technology and equipment to allow law enforcement to more efficiently and effectively respond to the rise in gun violence resulting from the pandemic, for example technology to assist in the
identification of guns whose serial numbers have been damaged.

**Assistance to Households (those impacted)**

- Food assistance and food banks;
- Emergency housing assistance, including rental assistance, mortgage assistance, utility assistance, assistance paying delinquent property taxes, counseling and legal aid to prevent eviction and temporary residences for people experiencing homelessness;
- Job training, public jobs programs and fairs, support for childcare and transportation to and from a jobsite or interview, incentives for newly employed workers, subsidized employment, grants to hire underserved workers, and development of job and workforce training centers;
- Health insurance coverage expansion
- Benefits for surviving family members of individuals who have died from COVID-19.
- Assistance to individuals who want and are available for work, including job training, public jobs programs and fairs, support for childcare and transportation to a jobsite or interview, incentives for newly employed workers, subsidized employment, grants to hire underserved workers, assistance to unemployed individuals to start small business & development of job and workforce training center.
- Burials, home repair & weatherization
- Programs, devices & equipment for internet access and digital literacy, including subsidies for costs of access.
- Cash assistance
- Paid sick, medical and family leave programs
- Assistance in accessing and applying for public benefits and services
- Childcare and early learning services, home visiting programs, services for child welfare involved families and foster youth & childcare facilities;
- Assistance to address the impact of learning loss for K-12 students (e.g., high-quality tutoring, differentiated instruction); and
- Programs or services to support long-term housing security: including development of affordable housing and permanent supportive housing.

Specifically, the rule does allow investments to be made in affordable housing if a development increase the supply of affordable housing. Specifically, Treasury will presume that an affordable housing project is eligible if the development would qualify under the National housing Trust Fund (NHTF) or Home Investment Partnership Program (HOME). These programs are consistent with a proportionate response to the affordable housing challenges faced by low- and moderate-income households as a result of the negative economic impacts of the pandemic. They also include a wide variety of affordable housing interventions, including production, rehabilitation, and preservation of affordable rental housing and, in some cases, affordable homeownership units. The NHTF and HOME programs allow the financing of a wide range of affordable housing activities and set clear eligibility criteria that many recipients are already familiar with.

**Assistance to Households (those disproportionately impacted)** - in addition those enumerated above:

- Pay for community health workers to help households access health and social services;
- Housing vouchers and assistance relocating to neighborhoods with higher economic opportunity.
• Investments in neighborhoods to promote improved health outcomes including improvements in open and public spaces;
• Improvements to vacant and abandoned properties, including rehabilitation or maintenance, renovation, removal and remediation of environmental contaminants, demolition or deconstruction, greening/vacant lot cleanup and conversion to affordable housing;
• Services to address educational disparities, including assistance to high-poverty school districts, educational and evidence-based services to address student academic, social emotional, and mental health needs.
• Schools and other educational equipment & facilities.

Assistance to Businesses (those impacted)
• Loans or grants to mitigate financial hardship, such as by supporting payroll and benefits, costs to retain employees, and mortgage, rent, utility, and other operating costs.
• Technical assistance, counseling, or other services to support business planning.

Assistance to Businesses (those disproportionately impacted) - in addition those enumerated above:
• Rehabilitation of commercial properties, storefront improvements & façade improvements
• Technical assistance, business incubators & grants for start-up or expansion costs for small businesses
• Support for microbusinesses, including financial, childcare, and transportation costs

Assistance to Nonprofits (those impacted and disproportionately impacted)
• Loans or grants to mitigate financial hardship, such as by supporting payroll and benefits, costs to retain employees, and mortgage, rent, utility, and other operating costs.
• Technical assistance, counseling, or other services that mitigate negative economic impacts of the pandemic

Assistance to Impacted Industries
• Aid to mitigate financial hardship, such as supporting payroll costs, lost pay and benefits for returning employees, support of operations and maintenance of existing equipment and facilities
• Technical assistance, counseling, or other services to support business planning
• COVID-19 mitigation and prevention measures (similar to those enumerated in the public health category)

Eligible uses to enhance effective service delivery:
• Program evaluation and evidence resources
• Date analysis resources to gather, assess, share and use data.
• Technology infrastructure to improve access to and the user experience of government IT systems, as well as technology improvements to increase public access and delivery of government programs and services.
• Community outreach and engagement activities
• Capacity building resources to support using data and evidence, including hiring staff, consultants, or technical assistance support
• Administrative costs for programs responding to the public health emergency and its economic impacts, including non-SLFRF and non-federally funded programs
• Address administrative needs
caused or exacerbated by the pandemic, including addressing backlogs caused by shutdowns, increased repair or maintenance needs, and technology infrastructure to adapt government operations to the pandemic (e.g., video-conferencing software, data and case management systems).

Example of collaboration projects with nonprofits or regional groups that Connecticut municipalities are considering:

- **Capital Projects:** The pandemic has drained many nonprofits of resources, including funding they may have saved for capital projects that would increase the efficiency of their programs. Investments in these projects - one-time expenditures - frees up nonprofit dollars that can be used for services and to improve the community in which they work.

- **Transportation** - in some parts of the state it is difficult for people to get to programs that can help them. This is especially important in times of peak stress, such as the pandemic and its aftermath.

- **Grief counseling** for people who have lost loved ones due to Covid (or other reasons during Covid)

- **Arts venues** often need to make structural changes and, having been closed, need funding for those. They may also need funds to subsidize performances and exhibits which, due to social distancing, cannot draw large enough crowds to support all the related costs.

- **Funding for existing mobile crisis teams designated by DMHAS and DCF** (Emergency Mobile Psychiatric Services) to add crisis clinicians to respond to community needs and which could be imbedded with police.

- **Programs for Substance Abuse Prevention and Treatment.** People with substance use disorders are more likely to catch COVID, get seriously ill or die from COVID and are more likely to become homeless. Substance use has been increasing during the pandemic.

- **Mental Health First Aid:** Similar in concept to CPR, Mental Health First Aid trains people in the community in ways to respond to mental health and substance abuse crises, e.g., training for trauma care.

- **Reentry Welcome Centers.** With funding from the Hartford Foundation for Public Giving several nonprofits and the city worked together to start the Greater Hartford Reentry Welcome Center, located in city hall. People are returning from prison faster due to the COVID risks, they and their families can go to the Center, which assesses their needs and determines the next steps to help the person make the transition back to the community.

- **School-based Mental Health Clinics.** Note that these are different from school-based health clinics that are in many communities. The mental health clinics can serve mental health and substance use needs of students and families that are growing as the pandemic continues.
Appendix 2 – Eligible staff under “Improving Public Sector Capacity” Sub-category

Public safety staff:
- Police officers (law enforcement)
- Firefighters
- Emergency medical responders
- Correctional and detention officers
- Dispatchers and supervisor personnel that directly support public safety staff.

Public health staff:
- Employees involved in providing medical and other physical or mental health services to patients and supervisory personnel, including medical staff assigned to schools, prisons, and other such institutions
- Laboratory technicians, medical examiners, morgue staff, and other support services essential for patient care
- Employees of public health departments directly engaged in public health matters and related supervisory personnel

Human service staff:
- Employees providing or administering social services and public benefits
- Child welfare services employees
- Child, elder, or family care employees

Appendix 3 – Process to hire public employees above pre-pandemic levels

1. Identify the recipient’s budgeted FTE level on January 27, 2020. This includes all budgeted positions, filled and unfilled. This is called the pre-pandemic baseline.

2. Multiply the pre-pandemic baseline by 1.075. This is called the adjusted pre-pandemic baseline.

3. Identify the recipient’s budgeted FTE level on March 3, 2021, which is the beginning of the period of performance for SLFRF funds. Recipients may, but are not required to, exclude the number of FTEs dedicated to responding to the COVID-19 public health emergency. This is called the actual number of FTEs. Subtract the actual number of FTEs from the adjusted pre-pandemic baseline to calculate the number of FTEs that can be covered by SLFRF funds.

Recipients do not have to hire for the same roles that existed pre-pandemic. Recipients may use SLFRF funds to cover payroll and covered benefits through the period of performance; these employees must have begun their employment on or after March 3, 2021. Recipients may only use SLFRF funds for additional FTEs hired over the March 3, 2021 level (i.e., the actual number of FTEs)
APPENDIX 4 – TREASURY’S LIST OF ESSENTIAL WORKERS

- Health care
- Emergency response
- Sanitation, disinfection & cleaning
- Maintenance
- Grocery stores, restaurants, food production, and food delivery
- Pharmacy
- Biomedical research
- Behavioral health
- Medical testing and diagnostics

- Home and community-based health care or assistance with activities of daily living
- Family or child care
- Social services
- Public health
- Mortuary

- Critical clinical research, development, and testing necessary for COVID-19 response
- State, local, or Tribal government workforce
- Workers providing vital services to Tribes
- Educational, school nutrition, and other work required to operate a school facility
- Laundry
- Elections
- Solid waste or hazardous materials management, response, and cleanup
- Work requiring physical interaction with patients
- Dental care
- Transportation and warehousing
- Hotel and commercial lodging facilities that are used for COVID-19 mitigation and containment
APPENDIX 5 – ELIGIBLE WATER AND SEWER PROJECTS

CWSRF Projects
(partial list – full list available at CWSRF)

• Construction of publicly owned treatment works
• Projects pursuant to implementation of a nonpoint source pollution management program established under the Clean Water Act (CWA)
• Decentralized wastewater treatment systems that treat municipal wastewater or domestic sewage
• Management and treatment of stormwater or subsurface drainage water (projects required under MS4 permit are eligible, regardless of ownership).
• Water conservation, efficiency, or reuse measures
• Development and implementation of a conservation and management plan under the CWA
• Watershed projects meeting the criteria set forth in the CWA
• Energy consumption reduction for publicly owned treatment works
• Reuse or recycling of wastewater, stormwater, or subsurface drainage water
• Security of publicly owned treatment works

DWSRF Projects
(partial list – full list available at DWSRF)

• Facilities to improve drinking water quality
• Transmission and distribution, including improvements of water pressure or prevention of contamination in infrastructure and lead service line replacements
• New sources to replace contaminated drinking water or increase drought resilience, including aquifer storage and recovery system for water storage
• Green infrastructure, including green roofs, rainwater harvesting collection, permeable pavement
• Storage of drinking water, such as to prevent contaminants or equalize water demands
• Purchase of water systems and interconnection of systems
• New community water systems (including expanding service to growing population that offers sustainable growth).
Appendix 6 – Reporting and Compliance
(source: Treasury Compliance and Reporting Guidance document)

6a – Expenditure Categories

1: Public Health

Covid-19 Mitigation and Prevention

- COVID-19 Vaccination
- COVID-19 Testing
- COVID-19 Contact Tracing
- Prevention in Congregate Settings (Nursing Homes, Prisons/Jails, Dense Work Sites, Schools, Child care facilities, etc.)
- Personal Protective Equipment
- Medical Expenses (including Alternative Care Facilities)
- Other COVID-19 Public Health Expenses (including Communications, Enforcement, Isolation/Quarantine)
- COVID-19 Assistance to Small Businesses
- COVID-19 Assistance to Non-Profits
- COVID-19 Aid to Impacted Industries

Community Violence Interventions

Community Violence Interventions

Behavioral Health

- Mental Health Services
- Substance Use Services

Other

- Other Public Health Services
- Capital Investments or Physical Plant Changes to Public Facilities that respond to the COVID-19 public health emergency

2: Negative Economic Impacts

Assistance to Households

- Household Assistance: Food Programs
- Household Assistance: Rent, Mortgage, and Utility Aid
- Household Assistance: Cash Transfers
- Household Assistance: Internet Access Programs
- Household Assistance: Paid Sick and Medical Leave
- Household Assistance: Health Insurance
- Household Assistance: Services for Un/Unbanked
- Household Assistance: Survivor’s Benefits
Unemployment Benefits or Cash Assistance to Unemployed Workers 2.9
Assistance to Unemployed or Underemployed Workers (e.g. job training, subsidized employment, employment supports or incentives) 2.10
Healthy Childhood Environments: Child Care 2.11
Healthy Childhood Environments: Home Visiting 2.12
Healthy Childhood Environments: Services to Foster Youth or Families Involved in Child Welfare System*^ 2.13
Healthy Childhood Environments: Early Learning 2.14
Long-term Housing Security: Affordable Housing 2.15
Long-term Housing Security: Services for Unhoused Persons 2.16
Housing Support: Housing Vouchers and Relocation Assistance for Disproportionately Impacted Communities** 2.17
Housing Support: Other Housing Assistance 2.18
Social Determinants of Health: Community Health Workers or Benefits Navigators*^ 2.19
Social Determinants of Health: Lead Remediation 2.20
Medical Facilities for Disproportionately Impacted Communities 2.21
Strong Healthy Communities: Neighborhood Features that Promote Health and Safety^ 2.22
Strong Healthy Communities: Demolition and Rehabilitation of Properties^ 2.23
Addressing Educational Disparities: Aid to High-Poverty Districts 2.24
Addressing Educational Disparities: Academic, Social, and Emotional Services*^ 2.25
Addressing Educational Disparities: Mental Health Services 2.26
Addressing Impacts of Lost Instructional Time 2.27
Contributions to UI Trust Funds 2.28

** Assistance to Small Businesses **
Loans or Grants to Mitigate Financial Hardship 2.29
Technical Assistance, Counseling, or Business Planning 2.30
Rehabilitation of Commercial Properties or Other Improvements 2.31
Business Incubators and Start-Up or Expansion Assistance 2.32
Enhanced Support to Microbusinesses 2.33

** Assistance to Non-Profits **
Assistance to Impacted Nonprofit Organizations (Impacted or Disproportionately Impacted) 2.34

** Aid to Impacted Industries **
Aid to Tourism, Travel, or Hospitality 2.35
Aid to Other Impacted Industries 2.36

Other
Economic Impact Assistance: Other 2.37
Household Assistance: Eviction Prevention -
Education Assistance: Other -
Healthy Childhood Environments: Other -
Social Determinants of Health: Other -

3: Public Health - Negative Economic Impact: Public Sector Capacity

General Provisions
Public Sector Workforce: Payroll and Benefits for Public Health, Public Safety, or Human Services Workers 3.1
Public Sector Workforce: Rehiring Public Sector Staff 3.2
Public Sector Workforce: Other 3.3
Public Sector Capacity: Effective Service Delivery 3.4
Public Sector Capacity: Administrative Needs 3.5

4: Premium Pay
Public Sector Employees 4.1
Private Sector: Grants to Other Employers 4.2

5: Infrastructure
Water and Sewer
Clean Water: Centralized Wastewater Treatment 5.1
Clean Water: Centralized Wastewater Collection and Conveyance 5.2
Clean Water: Decentralized Wastewater 5.3
Clean Water: Combined Sewer Overflows 5.4
Clean Water: Other Sewer Infrastructure 5.5
Clean Water: Stormwater 5.6
Clean Water: Energy Conservation 5.7
Clean Water: Water Conservation 5.8
Clean Water: Nonpoint Source 5.9
Drinking water: Treatment 5.10
Drinking water: Transmission & Distribution 5.11
Drinking water: Lead Remediation, including in Schools and Daycares 5.12
Drinking water: Source 5.13
Drinking water: Storage 5.14
Drinking water: Other water infrastructure 5.15
Water and Sewer: Private Wells 5.16
Water and Sewer: IIJA Bureau of Reclamation Match 5.17
Water and Sewer: Other 5.18

**Broadband**

Broadband: “Last Mile” projects 5.19
Broadband: IIJA Match 5.20
Broadband: Other projects 5.21

**6: Revenue Replacement**

Provision of Government Services 6.1
Non-federal Match for Other Federal Programs 6.2

**7: Administrative**

Administrative Expenses 7.1
Transfers to Other Units of Government 7.2
Transfers to Non-entitlement Units (States and territories only) 7.2

**6b - Reporting requirements when providing grant or loan in excess of $50,000:**

- Subrecipient identifying and demographic information (e.g., DUNS number and location)
- Award number (e.g., Award number, Contract number, Loan number)
- Award date, type, amount, and description
- Award payment method (reimbursable or lump sum payment(s))
- For loans, expiration date (date when loan expected to be paid in full)
- Primary place of performance
- Related project name(s)
- Related project identification number(s) (created by the recipient)
- Period of performance start date
- Quarterly obligation amount
- Quarterly expenditure amount
- Project(s)
- Additional programmatic performance indicators for select Expenditure Categories (see below)

**6c – Program Information Required for Expenditure Category Expenditures**

1. **Payroll for Public Health and Safety Employees (EC 1.9) – Collection to begin January 2022:**
   - Number of government FTEs responding to COVID-19 supported under this authority

2. **Household Assistance (EC 2.1-2.5) – Collection to begin January 2022:**
   - Brief description of structure and objectives of assistance program(s) (e.g., nutrition assistance for low-income households)
   - Number of households served (by program if recipient establishes multiple separate househ-
hold assistance programs

- Brief description of recipient’s approach to ensuring that aid to households responds to a negative economic impact of Covid-19.

3. Small Business Economic Assistance (EC 2.9) - Collection of this data will be phased in; no data will be collected in this area before April 2022:

- Brief description of the structure and objectives of assistance program(s) (e.g., grants for additional costs related to Covid-19 mitigation)
- Number of small businesses served (by program if recipient establishes multiple separate small businesses assistance programs)
- Brief description of recipient’s approach to ensuring that aid to small businesses responds to a negative economic impact of COVID-19.

4. Aid to Travel, Tourism, and Hospitality or Other Impacted Industries (EC 2.11-2.12) - Collection of this data will be phased in; no data will be collected in this area before April 2022:

- If aid is provided to industries other than travel, tourism, and hospitality (EC 2.12), a description of pandemic impact on the industry and rationale for providing aid to the industry
- Brief narrative description of how the assistance provided responds to negative economic impacts of the COVID-19 pandemic
- For each subaward:
  - Sector of employer
  - Purpose of funds (e.g., payroll support, safety measure implementation)

5. Rehiring Public Sector Staff (EC 2.14) - Collection to begin in January 2022:

- Number of full-time employees rehired by governments under this authority

6. Education Assistance (EC 3.1-3.5) - Collection to begin in January 2022:

- The National Center for Education Statistics (“NCES”) School ID or NCES District ID. List the School District if all schools within the school district received some funds.

7. Premium Pay - Collection to begin in January 2022:

- List of sectors designated as critical to the health and well-being of residents by the chief executive of the jurisdiction, if beyond those included in the Final Rule.
- Number of workers to be served
- Employer sector for all subawards to third-party employers (i.e., employers other than the State, local, or Tribal government)
- For groups of workers (e.g., an operating unit, a classification of worker, etc.) or, to the extent applicable, individual workers, for whom premium pay would increase total pay above 150 percent of their residing State’s average annual wage, on an annual basis.
- A brief written narrative justification of how the premium pay or grant is responsive to
workers performing essential work during the public health emergency. This could include a description of the essential workers’ duties, health or financial risks faced due to COVID-19, and why the recipient government determined that the premium pay was responsive to workers performing essential work during the pandemic. This description should not include personally identifiable information; when addressing individual workers, recipients should be careful not to include this information. Recipients may consider describing the workers’ occupations and duties in a general manner as necessary to protect privacy.

8. Revenue replacement (EC 6.1) – Collection began in August 2021:
   • Recipients will need to make a one-time decision to calculate revenue loss according to either:
     a) They are utilizing the standard allowance of $10 million, or
     b) Calculate revenue loss using the formula outlined in the final rule. If utilizing this approach, specific information will need to be supplied to substantiate the amount of revenue loss being claimed (i.e. base year, current year, etc.) as well as whether using calendar or fiscal year.
     • When reporting in the portal, the specific information is specified in the revenue replacement screen in the Treasury portal:

9. All infrastructure projects (EC 5) – Collection to begin in Jan. 2022:
   • Projected/actual construction start date (month/year)
   • Projected/actual initiation of operations date (month/year)
   • Location (for broadband, geospatial location data)
   • For projects over $10 million (based on expected total cost), information will need to be provided to ensure compliance with particular labor standards (specific information found in Reporting and Compliance Guidance document).
   • Water and sewer projects (EC 5.1-5.15) Collection to begin in January 2022 and required once the project starts:
     o National Pollutant Discharge Elimination System (NPDES) Permit Number (if applicable; for projects aligned with the Clean Water State Revolving Fund)
     o Public Water System (PWS) ID number (if applicable; for projects aligned with the Drinking Water State Revolving Fund)
     • Broadband projects (EC 5.16-5.17) Collection to begin in January 2022:
       o Confirm that the project is designed to, upon completion, reliably meet or exceed symmetrical 100 Mbps download and upload speeds.
       o If the project is not designed to reliably meet or exceed symmetrical 100 Mbps download and upload speeds, explain why not, and confirm that the project is designed to, upon completion, and can be scalable to a minimum of 100 Mbps download speed and 100 Mbps upload speed.
Appendix 7 - Common Definitions

(These are either defined in the final rule or endorsed by CCM’s Advisory Service Committee as common nomenclature to ensure compliance amongst all Connecticut municipalities)

• Capital expenditures: Expenditures to acquire capital assets or expenditures to make additions, improvement, modifications, replacements, re-arrangements, reinstallations, renovations, or alterations to capital assets that materially increase their value or useful life. Tangible assets are used in operations having a useful life or more than one year.

• Economic recovery: Addressing a harm that was caused or exacerbated by COVID-19 by investing into projects that attempt to remediate or adjust to the new conditions.

• Essential workers: Those enumerated in the final rule or are needed to maintain continuity of operations of essential critical infrastructure sectors.

• Reasonably proportional response: When determine eligibility for unenumerated projects, the response that would be obtained through the ARPA projects needs to be related and reasonably proportional to the harm caused by COVID-19. Specifically, local officials should consid-
er the relevant factors about the harm identified and the response to evaluate whether the response is reasonably proportional.

- **Government services:** Services and appropriations that are traditionally provided by local government. In general, those are typically budgeted and are reasonably expected by residents.

- **Enumerated/unenumerated:** Enumerated projects are a non-exhaustive list of projects and services are those that the final rule presumes eligible under the particular category. Projects and services that are unenumerated projects do not necessarily mean they are ineligible. Rather, they may be generally eligible if a (1) COVID-19 public health or economic impact can be identified, and (2) the ARP funds will respond to that impact.

- **Impacted/disproportionately impacted:** Impacted entities or individuals are those impacted by COVID-19 itself or the harmful consequences of the economic disruptions resulting from or exacerbated by COVID-19. Disproportionately impacted entities or individuals are those that experienced disproportionate public health and economic outcomes from COVID-19. Pre-existing disparities amplified some of the impacts from the pandemic, which caused more severe impacts in underserved communities.

- **Subrecipients/Beneficiaries/Recipients:**
  - **Recipients** are states and municipalities that received direct funding through the SLFRF of the ARPA (i.e. all Connecticut municipalities).
  - **Beneficiaries** likely experienced a harm due to COVID-19 and receive direct assistance from a recipient through the SLFRF program.
  - **Subrecipients** are those that receive a transfer of funds from a recipient to carry out a program or project on behalf of the recipient to assist a beneficiary (i.e. providing funding to a non-profit to assist in supporting homelessness).
In what categories will you likely be spending a majority of your funds? (Pick 3)

- Public health response (mitigation, prevention, behavioral health, violence prevention)
- Responding to economic harm (assistance to households, businesses, nonprofits)
- Water and Sewer projects
- Broadband
- Offset revenue loss
- Provide premium pay to essential workers

**Answer Choices**

<table>
<thead>
<tr>
<th>Public health response</th>
<th>59.09%</th>
<th>39</th>
</tr>
</thead>
<tbody>
<tr>
<td>Responding to economic harm</td>
<td>59.09%</td>
<td>39</td>
</tr>
<tr>
<td>Water and Sewer projects</td>
<td>46.97%</td>
<td>31</td>
</tr>
<tr>
<td>Broadband</td>
<td>21.21%</td>
<td>14</td>
</tr>
<tr>
<td>Offset revenue loss</td>
<td>62.12%</td>
<td>41</td>
</tr>
<tr>
<td>Provide premium pay to essential workers</td>
<td>9.09%</td>
<td>6</td>
</tr>
</tbody>
</table>

**Total Respondents:** 66
When determining revenue loss, will you be...

**ANSWER CHOICES** | **RESPONSES**
--- | ---
Using the Treasury formula | 21.88% 14
Using the standard allowance up to $10 million | 57.81% 37
Not using any funds in this category | 20.31% 13
TOTAL | 64

Are you considering premium pay for frontline/essential workers?

**ANSWER CHOICES** | **RESPONSES**
--- | ---
Yes | 13.64% 9
No | 74.24% 49
Other (please specify) | 12.12% 8
TOTAL | 66
Will you be providing a loan or grant to assist impacted small businesses?

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
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</thead>
<tbody>
<tr>
<td>Yes</td>
<td>45.31%</td>
</tr>
<tr>
<td>No</td>
<td>54.69%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>64</td>
</tr>
</tbody>
</table>

Will you be providing financial assistance to impacted nonprofits?

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>45.31%</td>
</tr>
<tr>
<td>No</td>
<td>25.00%</td>
</tr>
<tr>
<td>Unsure</td>
<td>29.69%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>64</td>
</tr>
</tbody>
</table>
Do you plan to provide funds to a nonprofit as a subrecipient to provide an eligible use to impacted individuals and/or communities?

**ANSWER CHOICES** | **RESPONSES**
---|---
Yes | 31.03% | 18
No | 68.97% | 40
TOTAL | 58

Have you, or will you be considering, allocating a portion of your ARPA funds towards regional projects?

**ANSWER CHOICES** | **RESPONSES**
---|---
Yes | 37.10% | 23
No | 62.90% | 39
Unsure | 0.00% | 0
TOTAL | 62
Have you, or do you plan to, hire a consultant to prepare a plan for some of your ARPA funding?

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>20.90%</td>
</tr>
<tr>
<td>No</td>
<td>56.72%</td>
</tr>
<tr>
<td>Unsure</td>
<td>22.39%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>

Have you, or do you plan, to convene a committee or task force (separate from your legislative body) to recommend potential projects?

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>43.94%</td>
</tr>
<tr>
<td>No</td>
<td>42.42%</td>
</tr>
<tr>
<td>Other (please specify)</td>
<td>13.64%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>
Has your municipality sought input from residents and the community regarding potential projects and investments using ARPA funds?

**ANSWER CHOICES** | **RESPONSES**
---|---
Yes | 69.70% 46
No | 30.30% 20
TOTAL | 66

If so, what mechanism have you used?

**ANSWER CHOICES** | **RESPONSES**
---|---
Public forum | 64.00% 32
Survey | 26.00% 13
Other (please specify) | 50.00% 25
Total Respondents: 50
Appendix 9 - Project Examples from Municipalities

Below are survey responses from local officials regarding ARPA projects that are being considered by Connecticut municipalities. Several of these projects are being considered by multiple municipalities. In addition, it does not reflect which category the projects would be assigned and are listed in no particular order.

Please note: The list is intended to provide towns and cities with examples and general guidance of potential projects. Each municipality will need to complete their own due diligence to ensure compliance with the Treasury rules on uses and reporting. As this is a guidance document, it should not be replied upon on as a definitive source in your reporting requirements to substantiate compliance.

- Covid testing site
- Funding for organizations and initiatives to help young people in hartford recover and heal from isolation and disruption of the pandemic (including grants directly to nonprofits and various arts and culture initiatives)
- Technology Upgrades - hardware and software
- HVAC upgrades
- Sewer Projects/Infrastructure
- Assist Business and NonProfits Loss of Revenue
- Combined sitework/design/construction of a new salt shed and ambulance garage, to be co-located with the Public Works garage.
- New Digital radio system
- Social Services aid
- Economic aid to small businesses
- Basic needs to families to provide support for rent, mortgage & utility assistance.
- Design and installation of site amenities at public park. This will help complete the master plan concept which will then be a draw for tourism in the City.
- Assistance to homeowners through Town Social Services department - expanded nursing services to homebound residents and Senior Center programs and establish a permanent outreach group and senior shopping program
- Broadband studies
- Septic system upgrades
- Pavement Management
- Emergency medical response equipment
- Fire prevention water infrastructure
- Cultural Coalition donation
- Demolition of an old school building
- Per Diem Fire Firefighters
- Plow Truck & Ambulance purchases
- Park Improvements
- Creation of a Birth to Eight child resources center
- Installing city water on certain streets with well water
- Sewer pump replacements for particular area of community
- Purchased Ambulance with equipment
• Purchased Road Sweeper and Vacuum Truck
• Matching grant program for downtown business investment
• Modernization of town wide video feed for town meetings
• Expand our sidewalks and enhancing Parks
• EKG Monitors for Ambulance
• Installing new piping in certain streets to prevent flooding
• Provide regional health district funding (as subrecipient)
• Sewer main extension to allow increased development opportunities.
• Non profit support geared towards youth, health and social services, workforce development and reentry affairs.
• Small Business Relief through expansion and storefront improvement grants
• Upgrade water pollution control measures
• Upgrades to Emergency Shelter
• Assist minority owners business impacted by closure of service industry
• Revitalization Program, code correction & dead retail space across the city and invent new businesses
• Business Assistance/Impact Grant
• Replacing or installing new generators to buildings
• Façade Improvement Projects for local Businesses
• Return staffing to pre-covid levels
• Critical water main and catch basin work
• Underground Oil Tank replacement
• Improvements to tennis courts/pavilions
• Police Body Cameras
• Flood Mitigation
• Revitalize winter festival to attract people to our downtown to assist businesses.
• Install new water line to an area servicing 10 homes.
• Affordable housing
• Update Cybersecurity and IT Infrastructure
• Renovate rest rooms, old showers and emergency shelter facilities at town hall for improved sanitation and social distancing
• Contribute to construction of bulky waste site
• Back up sewer pump
• Purchase of excavator for ARPA projects - upgrading recreational facilities, improve drainage and protect water supply
• Replace Fire Truck
• Replace Aging Boilers
• Community Center relocation
• Improvement of outdoor recreation
• Wastewater treatment plant emergency generator
• Establish a COVID safe emergency shelter
• Rehabilitated downtown parking area including stormwater treatment
• Enhance mental health
• Animal Control Facility upgrades
• Efforts to improve physical, mental and emotional health of the community & combat the increase in violence
• Hired town hall greeters to sign people in and call departments for appointments
• Emergency/safety gear for firefighters
• Funding for public school social worker/ESL tutors
• Hire for vaccine clinics
• Creating Broadband Municipal “Hubs”
• Development of a local trail & historical interpretive park (tourism asset)
• Update Town Hall technology to better accommodate remote/hybrid meetings as well as employee work from home capabilities
• In home test kits (all distributed)
• New playscapes in 5 of our parks
• Improving town building ventilation and handicapped accessibility
• Farmers Market Facility Improvements
• Public Works Communications System
• Brownfield Environmental assessment
• Cybersecurity
• Improvements to riverfront including streambed, stormwater and utility protection
• Computer Aided Dispatch
• Hire for contact tracing
• Engineering/design to renovate the High School track
• Partner with Habitat for Humanity for affordable housing projects will provide economic stabilization for Norwich households and local businesses.
• Support for social service agencies
• Installing a new bandstand for concerts and the arts
• Wastewater Treatment Plant Digester
• Renovation work to our Water Towers
• Marketing program to promote tourism
• Add funds to Housing Rehab Grant program that has long wait list.
• Extend sewer line to unserved western part of town from neighboring community
• Support Student Needs - Programs and Counseling Services
• Ventilation improvements at Town Hall
• Water and sewer pipe replacement during with bridge improvements
• Investments and partnerships designed to restore economic activity and promote economic growth
• Promoting Economic Recovery/Tourism
• Using funds to leverage into the State’s DECD CT Communities Challenge Grant, to revi-
atalize the historic downtown
• Water upgrades and drainage
• CAD RMS & Fire Radio Projects: This system will greatly enhance the functionality and efficiencies of the police and fire services which will in turn lead to a safer City.
• Investment in Youth employment opportunities
• Installing handicap bleachers at sports complexes
• Assistance to our Health Department
• Restoration of playhouse which is directly correlated to economic development
• Funds to offset cost increases on STEAP Grant project.
• Town Hall Front Entrance Improvements
• Provide grants to local small businesses that were negatively impacted by the pandemic
• Technology for virtual meetings at three locations.
• Vac-Con Catch Basin Cleaner
In July 2021, Town of East Windsor created the Emergency Relief and Stabilization Effort (E.R.A.S.E.) COVID-19 Grant through the American Rescue Plan to assist local businesses and nonprofits. The Town encouraged those economically impacted due to the pandemic to apply for assistance through the grant which ultimately served 114 local small businesses and nonprofits and were provided grants up to $10,000 per applicant. In total, the Town invested about $1.1 million of ARPA dollars into their local economy.

Applicants were asked to show some negative economic impact that had occurred during COVID, what their intended use would be, and how it would benefit businesses and nonprofits in the community, prospectively.

The Town hired a consultant to help administer the grant. During the review of applications there was consideration regarding economic loss, what is a small business, how much should the upper award limit be, should delinquent tax status be a consideration, should other government assistance be a consideration, how would the available funding be awarded, should long-term solvency be considered, etc.

The Town did not want to run a typical bureaucratic program – they wanted to work collaboratively to get funding into the local economy. As a result, the Board of Selectmen not only wanted the consultant to administer the program, but also proactively assist applicants to properly complete the application requirements. To accomplish this, the consultant worked directly with applicants via phone, email and personal visits to further determine qualified damages incurred by local businesses/nonprofits.

Once his work was completed, summaries and funding recommendations were provided to the Board of Selectmen for ultimate approval. In a few instances, the Board asked the consultant for some additional follow up, mainly for clarification purposes.

The results of the program resulted in most applicant’s approval up to the $10,000 upper limit allowed under the terms of the grant. Some of the industries that were assisted were in the industries of agriculture, home improvement, nonprofits, personal services, and retail.
Our Continued Mission to Enhance Hartford’s Community

The Hartford Chamber of Commerce serves to support our business community. We’re committed to making our city a place where businesses can thrive. The good news is, we’ve received grant funding and we’re here to help.

The Hartford Chamber recognizes the challenges property owners have undergone due to the COVID-19 pandemic. Many were unable to secure tenants in vacant storefronts, which created a reduction in revenues, increased costs, and an escalation of deserted business corridors. Our goal is to uplift these property owners and connect future business owners to opportunities for storefront space in Hartford.

What is Hart Lift?

Through the newly created Hart Lift program, the Hartford Chamber is directing up to $6,000,000 of American Rescue Plan Act (ARPA) funds to property owners throughout the City of Hartford who have been affected by the COVID-19 pandemic. These funds must be fully distributed by December 31, 2024.

Hart Lift’s intent is to provide property owners with funds to help incentivize small businesses to lease their vacant spaces and provide a much-needed economic boost in our downtown and neighborhood commercial corridors.

Downtown Boundaries
Program Eligibility
Grant funding is available to property owners (e.g., not delinquent on real or personal property taxes)

- in good standing located in the City of Hartford
- with vacant or unleased ground floor retail space
- with existing tenant with a lease of at least 3 years
- negatively affected by the COVID-19 pandemic

Program Parameters

- Grants provided can only be used for buildout costs of new or existing ground floor spaces in Hartford
- Property owners with vacant storefront are eligible for a grant of $50 per square foot, up to $150,000
- Any grant awarded to property owners in the designated downtown area must be matched at 100% by the owner of the property, the proprietor, or a combination of both parties
- Grants received by property owners outside of the downtown area must be matched at 50% by the owner of the property, the proprietor, or a combination of both parties
- Property owners with multiple vacant storefronts can apply for a grant for each empty property

Visit www.hartfordchamberct.com/hart-lift for more information

Hart Lift Program Partners
Leveraging ARP

Sustainable CT Actions and Projects to Increase the Impact of the American Rescue Plan
We thank the Emily Hall Tremaine Foundation, Common Sense Fund and the Smart Seed Fund for their generous support of the creation, development, launch, and administration of Sustainable CT.

We are grateful for additional support generously provided by:

We actively invite corporate sponsorship. To discuss the many ways support for Sustainable CT can benefit your company, please write to info@sustainablect.org.

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Leveraging ARP
Sustainable CT Actions and Projects to Increase The Impact of the American Rescue Plan

Sustainable CT is a free, voluntary program to inspire and support sustainability actions by municipalities in Connecticut. From affordable housing to thriving local economies, vibrant public spaces, green infrastructure, and inclusive and equitable programs and policies, Sustainable CT’s action roadmap helps towns improve the quality of life for all residents.

This document highlights some of the forward-thinking initiatives that Sustainable CT certified communities have taken (pre-ARP funding) that align with the goals of the American Rescue Plan. These stories might serve as examples, or generate ideas, about how you can use your ARP funds effectively. We have highlighted the specific Sustainable CT certification actions that correspond to each story. By clicking on those links, you will find a step-by-step guide to action implementation, available resources, and additional Connecticut municipal success stories.

 Indicates a project that received funding through Sustainable CT’s Community Match Fund, which has catalyzed investment of over $2.3 million in community-led sustainability projects throughout Connecticut over the past two years.
ECONOMIC RECOVERY

Sustainable CT Certification Action 2.3
Inventory and Promote Local Retail Options

Example: Wethersfield

Wethersfield has a robust buy-local campaign run by their Economic Development and Improvement Commission (EDIC) called “Shop Wethersfield.” This campaign has created logos and designations for local businesses and works together with the “Welcome to Wethersfield” program to create partnerships between the local real estate community and local business. The EDIC has created a business inventory and works across programs in town to support local businesses from farms to retail.

Sustainable CT Certification Action 4.1
Map Tourism and Cultural Assets

Example: Stamford

Stamford’s culture and tourism maps provide an overarching view of all that they have to offer from experiences to places to visit. Their innovative map is available online and offers easy visual identification and information about each location. This map format can help promote access and knowledge of local businesses and support their economic recovery. The way the map is laid out allows anyone looking for restaurants, arts, or genre-specific businesses to find what they are looking for in the city.
**Sustainable CT Certification Action 4.1**

Map Tourism and Cultural Assets

Example: **Milford**

The town of Milford created a website hosting information about events and places of interest within the town. There’s also a showcase of images and photos from the town depicting some of their more picturesque locations. The website hosts moving pictures and small videos as the backdrop to their homepage making a very seamless and modern design. Each of the tabs with things to do includes a small map of the town with the locations of some of the “hidden gems” and where to find them, with some quick information about each location. Their website promotes a thriving town with an historic feel and vibrant nightlife, reflecting their local economy in a modern and impactful way.

**Sustainable CT Certification Action 4.3**

Develop a Creative Placemaking Plan

Example: **Middletown**

The City of Middletown developed a placemaking plan for the revitalization of their Middletown Riverfront. They convened a collaborative group to develop a plan that blended community characteristics and cultural elements with this project. The City’s plan outlines a framework through which to view placemaking development. This model helps support all community members and can help serve as a framework for other towns looking to integrate placemaking into their development projects.
Sustainable CT Certification Actions 2.4
Provide Resources and Supports to Local Businesses

Sustainable CT Certification Actions 4.2
Support Arts and Creative Culture

Example: Art for Bridgeport Recovery Program

This art project in Bridgeport was developed by City Lights/Bridgeport Art Trail. Known as “ArtCade,” it is an area where people can meander and mingle with musicians, vendors, and artisans. The event and table space for vendors are free, and musicians and dancers are compensated. This initiative was developed to specifically support entrepreneurs impacted by COVID and to bring more residents and community members to walk and visit the downtown small businesses.

Sustainable CT Certification Actions 2.4
Provide Resources and Supports to Local Businesses

Example: A more welcoming Capitol Avenue (Hartford)

The City of Hartford worked to beautify their downtown to create more vibrant, welcoming, and environmentally conscious spaces. Their efforts focused on improving the environments for block residents and natural foot traffic within the area. This project helped support the maintenance of light fixtures, picnic tables, and planters within the area, helping to create a more welcoming environment for residents and visitors and improve the neighborhood for local businesses.
**Sustainable CT Certification Actions 2.5**

Promote Sustainable Workforce Development

Example: **Restorative Food Justice Program Emerge CT**

Emerge CT is running workshops to educate formerly incarcerated people in creating equitable food systems. The workshops cover a wide range of topics including growing backyard herbs and composting, cooking healthy alternatives, food system inequities, centering voices, and community involvement and wellness. This program not only helps educate individuals in wellness and food equity, but plays a vital role in developing sustainable community by addressing the barriers to re-entry for the formerly incarcerated.

**Sustainable CT Certification Actions 2.5**

Promote Sustainable Workforce Development

Example: **Youth Farming Apprenticeships (Simsbury)**

The town of Simsbury is helping foster future farming development and professional expansion. This initiative connects farmers who may be experiencing strain on supporting their farm with youth interested in farming. This helps support local agriculture and businesses and offers job training skills and preparation for youth in an important field. Apprenticeships are an integral step in building resilient and thriving economies in diversified fields that support a sustainable municipality.
WATER AND SEWER INFRASTRUCTURE

Sustainable CT Certification Action 3.8
Implement Low Impact Development

Example: New Haven

Prior to the City’s more widespread bioswale installations, Low Impact Development (LID) demonstration projects were conducted in coordination with local non-profits as proof of concept. These installations were used to test various construction methods, design details, and serve as educational and outreach tools.

ADDRESSING RACIAL DISPARITIES, INEQUITY, AND DISPROPORTIONATE HARM

Sustainable CT Certification Action 10.1
Encourage Healthy and Sustainable Food Networks

Example: New Britain

The City of New Britain convened a food policy group to address the access to healthy and sustainable food within their community after recognizing the high prevalence of fast food restaurants. Their collaborative work has resulted in establishing community gardens at all of the public schools within the city, as well as after school programs educating children about garden and food literacy. The program also supports high school youth with summer employment opportunities and the produce helps supply the local food pantry and mobile farmer’s market. The work included fifty community gardening plots located in the more economically depressed portions of the City.
**Sustainable CT Certification Action 10.1**

Encourage Healthy and Sustainable Food Networks

Example: **Food Recovery In Hamden**

The food recovery project underway in Hamden seeks to partner with local business, residents, and community stakeholders to address food insecurity and food waste. Business owners don’t want to waste food, but the time and energy needed to get food into the hands of vulnerable community members can be daunting and financially challenging. This program offers flexibility with donations and creates a network dedicated to transporting food to those who need it the most.

**Sustainable CT Certification Action 10.4**

Develop and Promote Community Growing Spaces

Example: **Sojourn Market (New Haven)**

The City of New Haven turned an empty lot in an economically distressed area of the City into a farmers market to help alleviate food insecurity and bring greater access to fresh produce and local vegetables. The market seeks to provide best resources, goods, and services, to promote abundant life, health, and prosperity. The market will also serve as the base for Recycled Justice, a youth-run program for neighborhood clean up, recycling, and composting.
**Sustainable CT Certification Action 11.1**

Design and Implement an Affordable Housing Plan

**Example:** **Trumbull**

The City of Trumbull conducted a housing diversity and needs assessment, including the examination of additional demographics and metrics relevant to providing ample housing. They’ve included plans for developing additional housing options in the town and for evaluating future plans of development.

**Sustainable CT Certification Action 11.2**

Grow Sustainable and Affordable Housing Options

**Example:** **Norwalk**

Norwalk increased their affordable housing by 1.32 percentage points after intentional efforts to diversify and increase the stock. Norwalk has implemented measures to ensure their housing remains affordable to lower income and working households, and they’re looking to further strengthen these guidelines. The Norwalk Plan of Conservation and Development works to improve upon the recommendations made to encourage more diverse housing options and mixed income development. The City is seeking to further expand housing options in an equitable way for all income levels.
Sustainable CT Certification Action 11.2
Grow Sustainable and Affordable Housing Options

Example: Affordable Housing Development Canaan

Falls Village is building an affordable housing development within their community to support aging populations and young people looking to stay in the community. They utilized Sustainable CT’s Community Match Fund to crowd-fund for a well for the site that would support the housing development project.

For more information, visit sustainablect.org or write to us at info@sustainablect.org. We look forward to working with you to create an ever better Connecticut.
For more information regarding this toolkit, please contact:
Michael Muszynski (mmuszynski@ccm-ct.org);
or Ron Thomas (rthomas@ccm-ct.org).