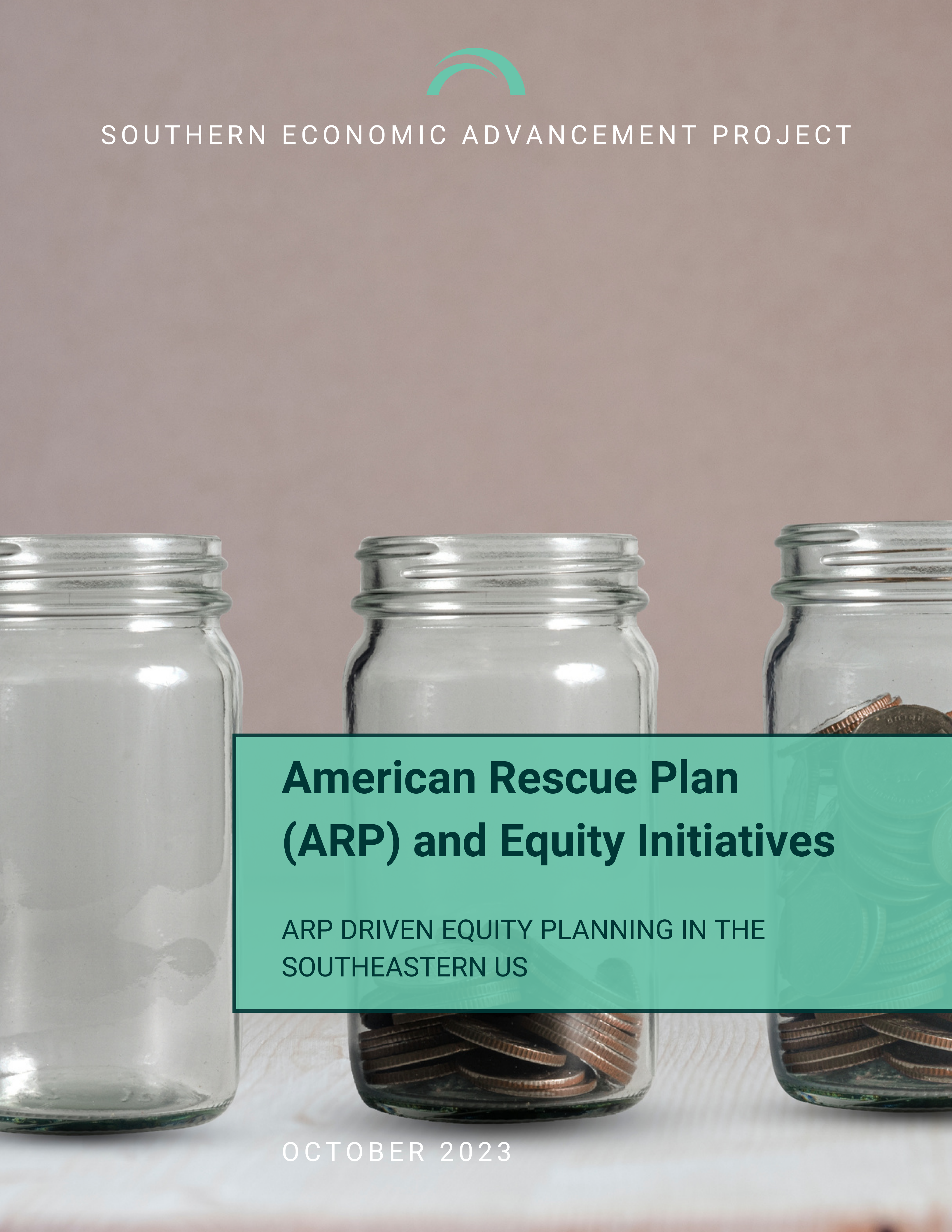

SOUTHERN ECONOMIC ADVANCEMENT PROJECT

American Rescue Plan (ARP) and Equity Initiatives

ARP DRIVEN EQUITY PLANNING IN THE SOUTHEASTERN US

OCTOBER 2023

ABOUT SEAP

SEAP is your partner and resource. We amplify the efforts of existing organizations and networks that work towards broadening economic power and building a more equitable future. Broadening economic power brings attention to how race, class and gender intersect social and economic policy in the South. We explore policy ideas designed to address these connections directly. SEAP focuses on 12 Southern states and marginalized/vulnerable populations within the region.

Authored by Sierra Scott, MCRP | GEORGIA INSTITUTE OF TECHNOLOGY

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In 2022, she co-produced a report regarding the Bipartisan Infrastructure Law that highlighted almost 150 municipal climate change initiatives from 38 cities across 12 Southeastern U.S. states, and identified 71 applicable funding sources.

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INTRODUCTION

On January 20th, 2021, President Joe Biden signed Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities*. In EO 13985, equity is defined as

> the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied treatment such as Black, Latino, Indigenous, and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality. (White House, 2022)

Subsequently, the American Rescue Plan Act (ARP) was signed into law by President Biden on March 11th, 2021. With $1.9 trillion dedicated to recovery efforts in response to the COVID-19 pandemic, this Act was created to fund over 200 programs and services to address disparities in outcomes for people of color, rural and Tribal communities, and other underserved communities in the U.S. (White House, 2022). Accompanied by the Inflation Reduction Act and the Build Back Better Act, each of these programs allocated funding to equity initiatives respectively. Thirty-thousand state, local, and tribal governments received a cumulative $350 billion in federal financial assistance through the State and Local Fiscal Recovery Fund (SLFRF) to encourage equitable, sustainable growth and recovery (White House, 2022). Many local governments are in the process of planning or implementing equity initiatives, supported by this historic federal funding.

The term “equity initiatives” is vague as it encompasses incredibly broad categories and interdependent institutions such as the built environment, distribution of resources, transportation, and education to name a few. When local governments receive large amounts of funding, such as that granted by the American Rescue Plan, creating equity initiatives can seem like a daunting task. Many local governments wish to encourage equitable growth but can be intimidated by such broad and deeply ingrained issues. The American Rescue Plan Act requires that SLFRF award funds be fully obligated by December 31st, 2024, and must be expended by December 31st, 2026. In addition, the Treasury requires regular reporting depending on government size, and extensive documentation to indicate how the funding was utilized.

The American Rescue Plan and corresponding State and Local Fiscal Recovery Funds has provided an unprecedented opportunity for governments across the nation to not only recover from COVID-19, but to address compounding disparities. While comprehensively addressing inequality will require more time and resources, governments have the potential to make new and/or expanded equity initiatives. Focusing on the Southeastern U.S., this paper examines the application of an equity framework by metropolitan cities and counties during the allocation and implementation of SLFRF. By incorporating an equity lens and community engagement tactics into their planning process via an equity framework, local governments have the power to encourage a more robust equity-centric planning process.

WHAT ARE SLFRF REQUIREMENTS?

Congress allocated SLFRF award funds to tens of thousands of U.S. governments which were categorized into six groups: States and the District of Columbia; Counties; Metropolitan Cities; Tribal Governments; Territories; and Non-entitlement Units of Government (NEU's) (Treasury, 2021). Given that this paper focuses on metro governments, it's important to note that Tier 1 metro cities and counties have populations of over 250,000 residents and were allocated over $10M in funding, while Tier 2 metro governments have less than 250,000 residents and were still allocated over $10M in funding. In addition to standard federal accounting practices, Tier 1 requires recipients to publish both an annual Recovery Plan Performance Report (7 total reports between August 31st, 2021 – April 30th, 2027), and quarterly reports (21 total reports between January 31st, 2022 – April 30th, 2027). Tier 2 recipients are only required to submit quarterly project reports.

While there are dozens of subcategories, the generally accepted spending categories are as follows (Treasury, 2022):

1. Public Health/Negative Economic Impacts: Recipients may use SLFRF award funds to provide assistance to households, small businesses, and nonprofits to respond to the public health emergency or negative economic impacts of the pandemic – such as rent, mortgage, or utility assistance – for costs incurred by the beneficiary.
2. Premium Pay: Recipients may provide premium pay retrospectively for work performed at any time since the start of the COVID-19 public health emergency.
3. Revenue Loss: Recipients have broad discretion to use funds for the provision of government services to the extent of reduction in revenue. While calculation of lost revenue is based on the recipient's revenue in the last full fiscal year prior to the COVID-19 public health emergency, use of funds for government services must be forward looking for costs incurred by the recipient after March 3, 2021.
4. Investments in Water, Sewer, and Broadband: Recipients may use SLFRF award funds to make necessary investments in water, sewer, and broadband infrastructure. Recipients may use SLFRF award funds to cover costs incurred for eligible projects planned or started prior to March 3, 2021.

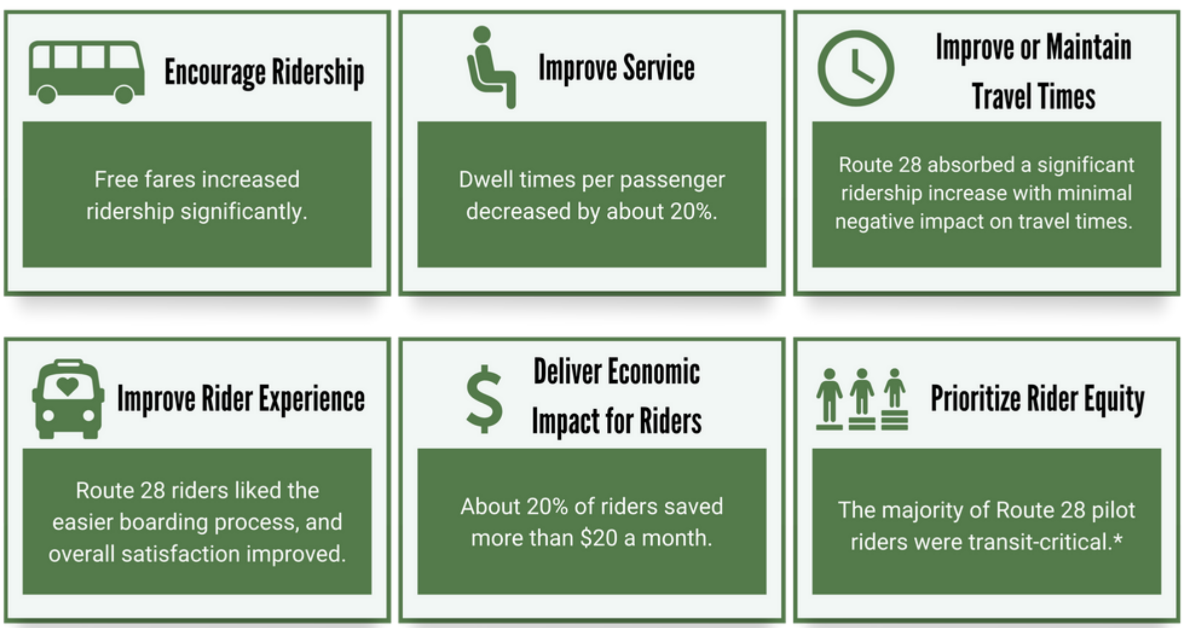
Each of the SLFRF eligible spending categories allows for a wide variety of applications, all of which are intended to advance equitable, sustainable recovery from the COVID-19 pandemic.

WHAT ARE EXAMPLES OF SLFRF EQUITY INITIATIVES?

TRANSPORTATION

In *Advancing Transportation Equity: Research and Practice*, Fan et. al defined equity within the context of transportation as systems that support multi-modal options that are affordable, sustainable, reliable, safe, and easy to use; services that are accessible to all populations for reaching destinations independently if needed (Fan et. al, 2019). While this study was in response to the Advancing Transportation Equity initiative launched by the Minnesota Department of Transportation (MnDOT) in 2017, many inequities noted by the authors are applicable to other U.S. cities. Racialized spatial segregation, and policies which encourage sprawling development patterns have resulted in the almost exclusively auto-dependent society today. Furthermore, the cost of transportation disproportionately impacts marginalized communities, compounding the impacts of other interrelated disparities.

In order to address transportation inequity, the city of Boston, MA, is using a portion of their ARP funds to launch a Fare Free Bus Pilot program. Partnering with the Boston Transportation Department (BDT), the city eliminated fares on three bus routes for a two-year period to measure the impact on ridership (City of Boston, 2022). This $10M transportation project addresses routes that have highest ridership and are connected to historically disinvested communities in Boston. The most recent system-wide survey conducted by the Massachusetts Bay Transportation Authority (MBTA) indicated that over half of the riders on these routes are classified as low-income residents. This pilot program, combined with other equity initiatives launched by the City of Boston and the BDT, has the potential to increase mobility and access to resources for tens of thousands of residents.



* Transit critical populations, as defined by the MBTA, include "residents who are low-income, people of color, seniors, people with disabilities, or who live in households with few or no vehicles."

Figure 1: City of Boston Transportation, Route 28 Fare-Free Pilot Evaluations, Summary Findings

In Frederick County, MD, planners took a different approach regarding their transportation equity initiative. Rather than alleviating the cost-burden of transportation of modes that incur high volumes of traffic, the county wanted to solely focus on increasing ridership by building out transportation infrastructure. The county's ARP transportation plan includes developing a $600,000 real-time tracking information service for riders, redesigning their existing network with about $100,000, and investing $500,000 in pedestrian infrastructure, transfer facilities, safety improvements, and bus shelters (Frederick County Government, 2021). Working closely with community partners, the county integrated input from those who utilize public transportation the most but are often excluded from the planning process. This equity transportation initiative is to be coupled with similar plans launched by municipalities located within Frederick County.

ENVIRONMENT

Within the context of the environment, the Environmental Defense Fund (EDF) defines equity as achieving fairness and balance in access to environmental resources, in bearing environmental burdens, and in participating in environmental decision-making. As a nonprofit advocacy group, the EDF also defines justice in this context as the remediation of environmental harms that have been imposed on specific communities. Access to green space, healthy homes, and safe neighborhoods come with a premium that is often inaccessible to communities of color, while the hazardous waste associated with creating such places is imposed onto the excluded communities.

Rockingham County, NH, has allocated a portion of their ARP funding to launch a green infrastructure project. This $8.2M green infrastructure project is geared towards investing in a 4.5MW solar array to help shift the county towards 100% clean energy, while also reducing the amount of taxes imposed onto future residents (National Association of Counties, 2021). The solar project is a portion of the county's $68M solar grid plan which will offset $700,000 in county electrical costs while generating an additional $100,000 in revenue each year. When combined with the county's $2.7M job training assistance program also funded by ARP, this becomes an equitable green energy initiative as not only is the energy burden reduced, but marginalized communities are intentionally being included in the county's transition to clean energy.

In the 2018 Sustainable DC plan, officials updated the capital's Building Energy Performance Standards (BEPS) in an effort to reduce the region's greenhouse gas emissions and energy consumption by 50% by 2032. The District of Columbia allocated $5.3M towards green infrastructure initiatives that exclusively target marginalized communities, while supplementing this existing green legislation. This initiative was created to aid affordable housing properties in the DC Housing Authority's portfolio in complying with BEPS (Brookings Institution, 2022). While many municipalities paused similar green initiatives at the onset of the pandemic, DC planners used this funding to protect communities that tend to have subpar housing conditions, so that they will not fall behind in the grid transition.

ECONOMIC

Equity in the context of economics can be defined as the fairness and distribution of economic wealth, tax liability, resources, and assets in a society (Chiu, 2019). Since the Economic Opportunity Act of 1964, countless initiatives have been launched intended to serve communities that have been denied the economic opportunities granted to the majority. Federal statistics indicate that the median wealth held by Black families is one tenth of that held by White families (Onyeador et. al, 2020). However, uncoordinated efforts at the municipal, state, and federal level, along with discrimination embedded into present day policy, has made it challenging for policy makers to address the root of economic inequities.

In Chicago, IL, the city has allocated $237M towards equitable economic recovery by focusing on three core areas: community development, small business and workforce support, and community climate initiatives. Chicago Metropolitan Agency for Planning (CMAP) has considered equity to be an imperative component of their planning process long before Executive Order 13985 was signed into law. This initiative has manifested in the form of grants, corridor ambassador programs, and the public outdoor plaza (POP!) programs. Regarding the corridor initiative, the city plans to invest $10M towards creating workforce opportunities and engagement along commercial corridors. Greater Chicago's Recovery Plan (CRP) utilizes funding from both the American Rescue Plan Act and over $600M in local bond funds. Through engaging in community outreach, this effort has the potential to address the wealth and employment gaps that persist in many of Chicago's marginalized communities.

The city of Dallas, TX, chose to establish a new department dedicated to long-term, equitable economic recovery with $7M (National Association of Counties, 2021). Over three years the economic development corporation will be constructed, with ARP funding to pay formation costs and staff onboarding, operational launch in FY23, a three-year work plan, and an operational budget for Years 2 and 3 after which the entity will become self-sustaining. This department will launch initiatives that support small businesses and those that serve low-income communities.

HOUSING

Equity in the context of housing can be defined as the guarantee of shelter for every member in society regardless of race, gender, sexual orientation, ethnicity, and socioeconomic classification. The Department of Housing and Urban Development classifies a household as cost-burdened when it pays more than 30% of its income towards housing expenses. Historic discriminatory planning practices such as redlining have had a profound impact today. Communities of color are often concentrated into neighborhoods that lack essential resources, which contributes to the cycle of poverty and restricted social mobility.

The City of Detroit, MI has launched a three-part housing initiative. Through *Intergenerational Poverty 1, 2,* and *3*, the city has allocated $67M across various projects (City of Detroit, 2021). The first of which is a $30M project that focuses on home repairs for seniors, low-income, and disabled community members. The second project involves allocating $7M to create a city locator service which would help individuals find affordable housing while also providing client management, financial counseling, and legal counseling services. Finally, the third component involves allocating $30M to preventing foreclosures and homelessness. This third project also includes credit repair and restoration, down payment assistance, and Veterans' housing programs. Seattle, WA created the Seattle Rescue Plan to guide their $116M SLFRF award funds. In addition to the $12.2M that the city was awarded by HOME-ARP, Seattle officials dedicated $49.2 of their combined funding to addressing Housing & Homelessness. Fund distribution within the housing sector is as follows:

Housing/ Homelessness	**$49,220,684**
Resources for Emergency Housing, Shelter and Services	
Additional Diversion	$1,300,000
Capacity Building (homeless and housing providers)	$4,300,000
Enhanced Shelter and Outreach	$7,500,000
Investments in Permanent Housing Strategies	
Increase RRH	$6,700,000
Permanent Housing Capital	$28,520,684 *
Additional Shelter	
Safe Lots	$500,000
Tiny Home	$400,000

*Includes $12.2M of HOME funds.

Figure 2: Seattle City Council, Seattle Rescue Plan

EQUITY LENS AND FRAMEWORK

In order to better address historical disinvestment and racism, many municipalities have begun using an equity lens throughout their decision-making process. This lens is often a set of questions to ensure that marginalized populations are included. Exact rubrics vary depending on the organization and nature of work, but the following questions are typically included.

1. **What decision is being made?**
    a. What beliefs, values, and assumptions (some of which will be cultural) guide how the topic is being considered?
2. **Who is at the table?**
    a. Who or what informs their thinking on the issue?
    b. Who is most affected by these decisions, and thus should be at the table?
    c. How can they be included?
3. **How is the decision being made?**
    a. What participatory structures can be added to hear from more voices, to equalize participation, and elements of consensus be used?
4. **What assumptions are at the foundation of the issue? Be explicit in naming these and the values and cultural bases for them.**
5. **What is the likely impact?**
    a. Does the policy, program, or decision improve, worsen, or make no change to existing disparities? Does it result in a systemic change that addresses institutional inequity?
    b. Does the policy, program, or decision produce any intentional benefits or unintended consequences for the affected groups?
    c. What is the real impact likely to be for different groups who are important to the organization?
6. **What is your decision?**
    a. Based on the above responses, what are the possible revisions to the policy, program, or decision under review that could address inequity/promote equity?

Figure 3: The Center for Nonprofit Advancement, What is an Equity Lens?

While there are many ways in which governments can engage in equity initiatives, this can be best simplified as inputs and outputs, or procedural and distributional equity. Procedural equity focuses on equitable input within the planning process (questions 2 and 3 above), while distributional equity focuses on the output, impact, benefits, or burdens of a given plan (question 5 above).

DISTRIBUTIONAL EQUITY

As an example of distributional equity in practice, the Evaluating Transportation Equity: Guidance for Incorporating Distributional Impacts in Transport Planning serves as a guide for governments to incorporate distributional impacts into transportation planning by defining various equity types, impacts, metrics, and objectives to consider, while conveying the importance of equitable evaluation (Victoria Transport Policy Institute, 2021). Figure 4 displays the various types, impacts, measurement units, and groups to consider in a distributional equity analysis.

PROCEDURAL EQUITY

Procedural Equity addresses the commitment to communities having a voice in the decision-making process, and that adaption planning are done through diverse and inclusive engagement processes (Georgetown Climate Center, 2022). Equity in this form is often overlooked for distributional, but the distribution of resources is entirely dependent on the procedures that determine the reasons for their allocation, and the way in which this is achieved. Using an equity lens, Benoy Jacobs details how local governments can restructure their decision-making process to be centered around equity in every sector in “Governing for Equity: Implementing an Equity Lens in Local Governments.” This report is designed to help governments act decisively by promoting equity throughout the government, training all staff members on racial bias in planning, and assessing the effectiveness of equity initiatives in reducing disparity (Jacobs, 2020).

To achieve procedural equity, decision-making requires full participation of those impacted, adequate information, complete expression of opinion, and the impartiality of decision-makers (Tarekegne et. al. 2021).

Types of Equity	Impacts	Metrics	Groups
Horizontal (Fairness) Equal treatment of equals. Equal benefits and costs. "Get what you pay for and pay for what you get." **Vertical with-respect-to Need and Ability** Multimodal planning. Universal design. Special mobility services. **Vertical with-respect-to Income and Social Class** Affordability. Quality of low-price modes. Targeted subsidies. Impacts on low-income communities. **Social Justice** Impacts on minority communities. Affirmative action.	**Facilities and Services** Facility planning and design. Funding and subsidies. Involvement in planning. **User Benefits and Costs** Service quality (convenience, comfort, speed, safety). User information. Fares, fees and taxes. **External Impacts** Congestion delays. Crash risk. Pollution and hazardous material exposure. **Economic Impacts** Economic opportunities. Job and business impacts. **Regulation and Enforcement** Regulations and enforcement.	**Level of Impacts** *Inputs* (funding, road space, etc.). *Outputs* (amount of mobility and accessibility). *Outcomes* (trips made, cost burdens, crash injuries, etc.). **Units of People** Per adult. Per commuter or peak-period travel. Per household. **Units of Travel** Per vehicle-mile or -km. Per passenger-mile or -km. Per trip (by type). **Financial** Per dollar. Subsidies. Cost recovery.	**Demographics** Age and household type. (Dis)ability. Income and poverty rates. Race and ethnicity. Driver's licensure. **Location** Jurisdiction and neighborhood. Urban/suburban/rural. **Mode** Active (walking & bicycling). Motor vehicles. Transit user/dependent. **Industries** Equipment/service providers. Shippers. Employees. **Trip type** Commutes and errands. Commercial/freight. Recreational/tourist.

Figure 4: Victoria Transport Policy Institute, Evaluating Transportation Equity

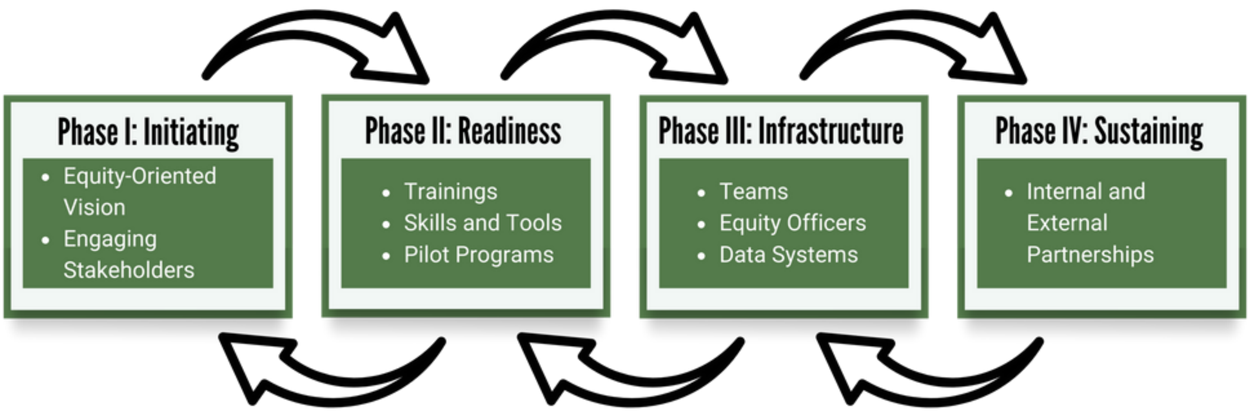


Figure 5: Jacobs 2020, Governing for Equity: Implementing an Equity Lens in Local Governments

Within ARP, Harris County, Texas offers an example of an equity framework that prioritizes both procedural and distributional equity. The Commissioners Court of Harris County, TX, approved a motion which spurred the collaboration of the Budget Management Department, the Department of Economic Equity and Opportunity, the Community Services Department, and the Commissioners Court's Analyst Office. The product of this joint effort was an equity framework which describes equity goals, strategies, reflections, and scoring for advancing in equity in the county's projects funded by ARP.

Does the Project Proposal...		Score
Leverage clear outcome measures & disaggregated data	Include a statement of inequities to be addressed: specific outcomes, disaggregated by race, gender, geography, or other relevant variables (using appropriate proxies for these if not available)? Identify specific groups disproportionately impacted by the pandemic? Prioritize disproportionately affected groups as primary audiences?	
Analyze specific factors underlying inequity	Describe how discrimination, policy impacts, institutional barriers, or other social or environmental conditions have contributed to the identified inequities? Consider if other groups, not identifiable in data, may also be affected by the identified inequities based on the factors above? Articulate how the program design takes into account discrimination, policy impacts, institutional barriers, or other social and environmental conditions?	
Include voices of community representatives	Identify potential partners from community institutions, non-profits, and other organizations representing disproportionately affected groups? Incorporate meaningful moments to engage with representatives or individuals from the disproportionately affected groups? Incorporate input from representatives of disproportionately affected groups who have participated in project development, taking into account their lived experiences?	
Target resources & strategies to minimize burden & maximize access	Target resources and strategies to minimize burden on disproportionately impacted groups? Target resources and strategies to maximize access for disproportionately impacted groups?	
Evaluate performance through defined metrics & reflection	Include a plan to measure and evaluate outcomes, specifying metrics to be tracked and how data will be disaggregated by race, gender, geography or other demographic variables? Include a plan to expand access to relevant data if original data sources were insufficient? Include plans to engage in Equity Reflections and adapt the project as needed based on interim results and community impact?	
Publish transparent program results	Discuss channels for disseminating reports and information? Include means of reaching disproportionately impacted groups within the results dissemination plan?	
	Total Proposal Score	

Scoring:
-1 = Not done, or including adverse impacts contrary to the Equity Strategy
0 = Minimally completed
+1 = Thoroughly completed

Proposals are scored by the relevant Working Group.
Proposals with a negative score are rejected or sent back for significant redesign.
Proposals with a neutral score are further reviewed and refined by the Working Group.
Proposals with a positive score may be considered for submission to the Steering Committee.

Figure 6: Harris County Budget Management Department, American Rescue Plan Act (ARPA) Equity Framework

DATA AND METHODOLOGY

Given the nascent nature of the ARP, it's unclear as to whether or not the conditions surrounding funding – i.e., timeline requirements, eligible spending categories, reporting methods etc. – will have an impact on the successful implementation of equity initiatives. Each of the previously reviewed equity frameworks and considerations encourage a robust analysis of current systems. While this type of review is crucial to addressing the root of systemic disparity, it may be challenging for government entities to navigate for the first time while simultaneously navigating the ARP's requirements.

The intended purpose of this study is to identify government entities who have created and/or utilized equity frameworks and resources in order to implement equity initiatives within the parameters of the ARP. It's important to note that the term framework is interchangeable with similar terms including funding process guidance, scorecard, scoring matrix, and toolkit to name a few. The variety of names is due to the fact that this is not yet a standardized practice but instead a process in which cities are creating their own systems.

We have created the ARP Municipal & County Equity Scoring Matrix (Table 1), formed with a set of criteria which requires the input of categorical and nominal data.

Criteria	Number of SLFRF Projects	Percentage of Funds Remaining	Average Status of Completion	Average Length of Project	Equity Framework	Additional Considerations
Definition	This indicates the number of projects that governments have funded with State and Local Fiscal Recover Funds.	This ratio divides SLFRF that a government has obligated by the total amount of SLFRF funding that has been allocated to a city, or county, as of 12.31.2022.	This is the average status of completion achieved by a given county or municipality. This includes one of four options: Not Started; Completed less than 50%; Completed 50% or more; or Completed.	This is the average length of time that a government's SLFRF projects require to achieve full implementation. This includes any combination of the following three categories: Short-Term (0-6 months); Medium-Term (6 months - 2 years); and Long-Term (2-4 years).	This is to determine whether or not an equity framework was used in the planning process: "yes" or "no."	This takes into account equity-related policy, plans, resolutions, dashboards, committees, and other components that existed prior to ARPA, or were created as a result.

Table 1: ARP Metro Municipal and County Scoring Matrix

This analysis includes whether or not a metro municipality or county used any of the aforementioned equity framework-formats while analyzing how many projects they have created, what percentage of SLFRF funding they have remaining, the average status of completion for their projects, and the average length of time each project requires to be implemented. Additional considerations such as an existing equity department or framework will also be noted. Although this analysis doesn't isolate every variable that might contribute to a plan's completion, the intended goal is to highlight any trends across different Southeastern U.S. governments given these parameters.

Given that this study focuses solely on municipal and county governments within metropolitan regions, the following entities were selected: Broward County, FL; City/Parrish of Baton Rouge, LA; City of Charleston, WV; City of Durham, NC; City of Jackson, MS; City of Little Rock, AR; City of Memphis, TN; City of Mobile, AL; City of Norfolk, VA; Fulton County, GA; Greenville County, SC; and Lexington-Fayette Urban County, KY. In Table 2, detail is provided for each government regarding their population, median income, and project key terms.

Government/ State	Population	Median Income	Project Key Terms
Broward County, FL	1,944,375	$65,747	Government Services
City/Parrish of Baton Rouge, LA	227,470	$41,257	Affordable Housing, Community Violence Intervention, Economic Development, Cyber Security, Mixed-Use Development, etc.
City of Charleston, WV	48,864	$54,101	Community Health Center, Mental Health, Wraparound Services, Counseling, etc.
City of Durham, NC	283,506	$71,343	Eviction Assistance, Reentry Housing, Latino Credit Union, Business Equity, Affordable Sustainable Homes, Community Infrastructure Investment, Equitable Engagement, Community Driven Planning, Digital Literacy Training, Wealth Building, etc.
City of Jackson, MS	153,701	$30,070	Administrative, Nonprofit Assistance, Water Distribution, Treatment Plant, Water & Sewer, etc.
City of Kansas City, MO	508,090	$63,396	Housing Trust Fund, Land Bank, Homelessness Support, Homeownership, Community Gardens, Neighborhood Resilience, Small Business, Violence Prevention, etc.
City of Little Rock, AR	202,591	$53,565	Broadband, Capital Improvements, Drainage, Parks and Community Centers, Community Violence Intervention, Stormwater Management, etc.
City of Memphis, TN	633,104	$44,317	Affordable Housing, Youth Engagement, Mobile Library, Community Health, Violence Intervention, Broadband, Micro-Grocery, etc.
City of Mobile, AL	187,041	$43,786	Affordable Housing, Downpayment Assistance, Small Business, Rental Assistance, Utilities, Community Violence Intervention, etc.
City of Norfolk, VA	283,005	$56,244	Business Assistance, Economic Inclusion Grants, Eviction Mitigation Gap Financing, Business Assistance, etc.
Fulton County, GA	1,066,710	$83,192	Behavioral Health, Child Care, Job Training, Food Insecurity, Community Services, etc.
Greenville County, SC	525,534	$68,540	Affordable Housing, Premium Pay, Revenue Replacement, Medical, Overtime, Vaccination , etc.
Lexington-Fayette Urban County, KY	322,570	$60,942	Access to Greenspace, Affordable Housing, ADA Improvements, Minority Business, Economic Development, Housing Stabilization, Mental Health, etc.

Table 2: Southeastern U.S. Selected Case Studies

The purpose of this analysis is not to determine objectively whether or not a government is using its funds in an appropriate manner. Instead, this study will provide a snapshot into whether or not governments in the Southeastern U.S. have incorporated equity frameworks into their SLFRF planning process, and how this impacts their project outcomes.

RESULTS

In this section we will review the results of the Applied ARP Metro Municipal and County Scoring Matrix (Table 3).

Government/ State	Number of SLFRF Projects	Percentage of Funds Remaining	Average Status of Completion	Average Length of Project	Equity Framework	Additional Considerations
Broward County, FL	1	0.0%	Completed	Short-Term	No	Equity and Community Investment (ECI)
City/Parrish of Baton Rouge, LA	43	54.9%	Completed Less than 50%	Long-Term	Yes	Commission on Racial Equity and Inclusion
City of Charleston, WV	14	78.1%	Completed Less than 50%	Short-Term/ Medium Term	No	
City of Durham, NC	34	43.5%	Completed	Medium-Term	Yes	Equity and Inclusion Department, Scorecard
City of Jackson, MS	9	19.7%	Completed Less than 50%	Short-Term/ Medium-Term	No	
City of Kansas City, MO	104	29.4%	Completed 50% or More	Medium-Term	Yes	Office of Racial Equity and Reconciliation
City of Little Rock, AR	34	59.7%	Completed Less than 50%	Short-Term/ Medium-Term	Yes	Office of Diversity, Equity, and Inclusion
City of Memphis, TN	29	0.0%	Completed Less than 50%	Medium-Term/ Long-Term	Yes	Office of Diversity and Inclusion
City of Mobile, AL	19	58.3%	Completed Less than 50%	Short-Term/ Medium-Term	No	
City of Norfolk, VA	22	0.0%	Completed Less than 50%	Long-Term	Yes	Office of Diversity, Equity, and Inclusion, Mayor's Commission on Social Equity
Fulton County, GA	20	56.2%	Completed Less than 50%	Short-Term/ Medium Term	No	Taskforce for Racial Equity in All Policies
Greenville County, SC	13	0.0%	Completed	Short-Term	No	
Lexington-Fayette Urban County, KY	84	56.0%	Completed 50% or More	Medium-Term/ Long Term	Yes	Office of Diversity and Inclusion

Table 3: Applied ARP Metro Municipal and County Scoring Matrix

Each of the criterion contributes to a better understanding of both the objective of a given government, in addition to their effectiveness in planning with SLFRF award funds. Across the board, governments that utilized some sort of equity framework had created a greater number of projects (22-104 projects) than governments that did not utilize an equity framework (1-20 projects) as exhibited in Figure 7.

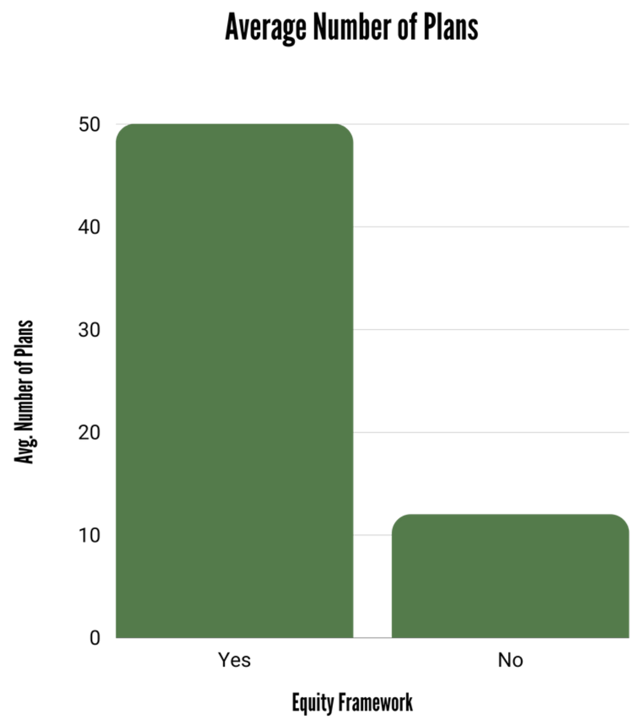


Figure 7: Comparison of Average Number of Plans

This suggests that governments that utilize equity frameworks are able to offer a wide range of services to support vulnerable populations. Kansas City, MO boasts 104 SLFRF projects which is over 5x more than the highest non-equity framework government, Fulton County (20 SLFRF projects).

Regarding the percentage of funding remaining, governments that utilize an equity framework tend to have allocated almost half of their funding (0-59.7%) whereas the other governments had a wider range of allocation (0-78.1%). It's important to pair this data with both the average length of project, and the number of SLFRF projects. While Durham still has 43.5% remaining, almost all of the 34 projects they've started have been completed, meaning that they're able to follow through on the ambitious nature of their plans with proven action. Additionally, even though Norfolk has completed less than 55% of their 22 plans, all of their funding has been allocated and is being implemented in phases of long-term projects. On the other hand, both Broward and Greenville Counties have allocated all of their funds and completed their projects. However, Broward solely invested in revenue replacement whereas Greenville allocated funding primarily into COVID-19 related debt and existing government services. By utilizing equity frameworks, both Durham and Norfolk have created innovative projects that are guided by community input, solely focusing on disinvested communities.

It's clear that an existing Office of Diversity and Inclusion or similar government department also contributed to the utilization of equity frameworks with SLFRF award funds. The only case where this was not applicable was Broward County, which, again, chose to only invest in their county's revenue replacement. Even when comparing two government with comparable median incomes and populations – Mobile, AL and Baton Rouge, LA – only Baton Rouge chose to create a Commission on Racial Equity and Inclusion. Guided by their equity framework, Baton Rouge, LA has been able to efficiently implement more long-term projects while also allocating more of their SLFRF award funds than Mobile, AL.

While the results indicate that communities who utilize an equity framework are able to create equity initiatives that are efficiently implemented, innovative, and more nuanced, there are a few factors to consider. The first of which is in regard to the prior conditions of a given government. The current needs of a given municipality or county is entirely dependent on choices made by predecessors. While Little Rock, AR has the resources and capability to focus on many Short-Term and Medium-Term projects, Jackson, MS is in desperate need of adequate water infrastructure. For this reason, Jackson, MS invested over 1/3 of their SLFRF award funds into a system-wide water distribution project and thus had less funding for other initiatives. Table 2 also shows that the median income for residents of Durham, NC is higher than the median income for Jackson, MS residents. This suggests that historically, Durham, NC has had access to more tax revenue with which they could invest in more public services, compared to Jackson, MS.

Additionally, political turnover can contribute to the delay or denial of equitable initiatives. For example, although Little Rock, AR has an equity framework, the State's new Governor has repealed the creation of the former Governor's ARPA Oversight Committee. This change of administration has caused confusion for many applicants, as it has yet to be resolved. However, these factors do not mitigate the results of this study which indicate that equity frameworks encourage robust, equitable, and efficient allocation of SLFRF award funds.

POLICY RECOMMENDATIONS

By requiring the utilization of equity frameworks and evaluating rubrics such as that from the Urban Institute's Pathways to Equity at Scale, local governments can be held accountable to implement equity initiatives thoughtfully and effectively. The nature of such frameworks requires governments to consider how historic discrimination evolved into today's disparities, and the inclusion of disadvantaged groups among other metrics. Analyzing equity initiatives in this manner ensures that marginalized communities are actively involved in the process of procedural justice. This notion of procedural justice will allow for communities to hold their governments accountable throughout the planning process, while also allowing for governmental departments to hold each other accountable.

For governments looking to implement an equity framework there are a number of steps that need to be taken, many of which involve internal analysis. The following policy recommendations will lay the foundation of creating an equity framework while also further encouraging civic engagement and transparency to increase accountability.

GOVERNMENT ORGANIZATION

While governments in recent years have begun incorporating equity-centric planning theories into planning practice, the residual impact from rational planning is still deeply embedded in government systems. The way that government's function reflects this as community engagement tends to be a minute component of given plans and projects.

In order to restructure general government organization, we recommend passing an Equity Resolution, as exhibited by Arlington County, VA (Arlington County Board, 2019). This will allow for governments to define equity within their geographic context, identify community stakeholders, create specific equity-analysis questions, and both create and designate departments to implement standards. This department will then create an equity framework to hold departments accountable for abiding by such standards. Additionally, we recommend that governments pass this resolution with the stipulation that a yearly Needs Assessment Study is conducted, similar to one conducted in Greene County, MO (Greene County ARPA Team, 2021). This will allow for governments to alter plans in a time-sensitive manner in order to respond to current community need.

CIVIC ENGAGEMENT

Many of the local government SLFRF award funds were used either in collaboration with local non-profits, steering committees, and other government departments. In addition to this, governments should incorporate traditionally excluded voices in innovative ways.

For this, we recommend that governments establish context-specific Minority Advisory Councils that are involved throughout planning procedures. An example of this is the Youth Council that was formed in Louisville, KY, that was created to ensure that all constituents regardless of age were included in equity decision-making (University of Louisville, 2016). Another example of encouraging civic engagement is by implementing a Participatory Budgeting program, such as the program in Durham, NC (City of Durham, 2023). This is a financial planning method that directly involves community members in budgeting and fund allocation. The City of Durham has used it throughout their SLFRF process, which has allowed for citizens to significantly influence priority funding areas.

PROJECT TRANSPARENCY

While conducting the analysis portion of this document, it became clear that most governments don't present project and plan information in a manner that is accessible to the public. Inaccessibility only contributes to the challenge of holding governments accountable regarding the creation and implementation of equity initiatives. For this, we recommend the creation of a Project Tracking Dashboard similar to the one created by the City of Norfolk, VA, as it is frequently updated and user friendly (City of Norfolk, 2023). Another example of this is the project dashboard created by the Southern Economic Advancement Project (SEAP, 2023). This dashboard is easy to navigate and provides real-time plan tracking as updated by the U.S. Department of the Treasury. By utilizing SEAP's tracker rather than creating one, this also allows for governments to conserve resources and reduce any potential administrative burden.

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