AMERICAN RESCUE PLAN ACT (ARPA)
CORONAVIRUS CAPITAL PROJECTS FUND (CPF)
COMMUNITY LEARNING CENTERS MUNICIPAL GRANT

STAGE 2 GUIDANCE – COMPLIANCE, PROCESS & TIMELINE   OCTOBER 5, 2023

The Pandemic Recovery Office (PRO) at the State of Rhode Island launched the application process for the CPF Community Learning Centers (CLC) Municipal Grant on August 7, 2023. Stage 1 of the application process ended on August 15th and 34 municipalities completed this stage and thereby secured their formula-based allocation of the grant funds. PRO then conducted one-on-one conversations with all applicants and provided guidance on next steps. Stage 2 opened on September 5, 2023, **with an extended due date of October 13, 2023**.

This guidance document reiterates programmatic advice provided during the 1-on-1 meetings PRO conducted with all applicant municipalities. It also provides an explanation of the State's evaluation criteria, timeline for next steps, and clarification on several questions raised during the Stage 2 municipal outreach.

U.S. Treasury Eligibility Criteria

In their guidance for the CPF grant, U.S. Treasury has placed a strong emphasis on community engagement and evidence-based programming. Here is some advice PRO has shared about these two eligibility criteria:

DATA/EVIDENCE: Municipalities will have to demonstrate that the services programmed in their Community Learning Centers will address issues that were created or exacerbated due to the Covid-19 pandemic. Per U.S. Treasury – *"Recipients may choose to consider any available data, including, but not limited to federal and/or state collected data, such as the American Community Survey or the U.S. Department of Housing and Urban Development's Qualified Census Tracts, related to internet use, device ownership, income, poverty, health, education, and employment; interviews with community members and business owners; reports from community organizations; documentation of existing facilities providing similar or identical services to those the Capital Project is intended to provide; and any other information they deem relevant."* Some examples of such data may be:

a. Test results analyzed by the local school district demonstrating the need for certain interventions for students to help overcome the negative impact of the pandemic on their performance.

b. Reports from Rhode Island's Department of Labor and Training identifying worker skills and job sectors that suffered due to the pandemic and where additional resources may be directed to improve the employability and earnings of Rhode Islanders.

c. Community clinic data or Rhode Island Department of Health report that highlights health conditions or concerns that developed or worsened due to the pandemic, and which may be treated and monitored to improve the community's health outcomes.

COMMUNITY ENGAGEMENT: Treasury's guidance is that to be eligible for CPF funds, recipients must engage in grassroots community outreach that enables participation from diverse and representative stakeholders in their communities. This can be done in several ways depending on the size and composition of your community. Some examples are:

a. Regular brief surveys hosted on the municipality's webpage and/or social media page.
b. Periodic Town-hall-type meetings that primarily focus on the Community Learning Center project.
c. Community forums at locations and times convenient to a broad cross section of the community. For instance: 5:30pm on a weekday at the local library or weekend mornings as the local community center.
d. Multi-media and different modes of participation to make it easy for marginalized voices to be heard. For instance: a video-call provision for town meetings that enable those who cannot travel to the venue to participate. Community forums coupled with online surveys allowing everyone to share their comments/ideas without having to meet for long hours.

These community engagement strategies are not mutually exclusive and can be deployed in combination with each other. It is important to develop a robust engagement plan that can be deployed over the performance period which ends on December 31, 2026.

All recipients of the CLC grant will need to report the following in their annual report which PRO is required to submit to U.S. Treasury:

• Summary of community engagement and public participation activities conducted to solicit input from and/or partner with communities from the past year that informed the definition of critical need for program(s) and projects; and

• Summary of future community engagement and public participation activities planned for the upcoming year that will continue to shape program and project selection, implementation, and operation.

Program compliance:

U.S. Treasury considers projects to construct or improve buildings that are designed to *jointly and directly* enable work, education, and health monitoring are eligible for funding under the Capital Projects Fund program.

By "directly" the Treasury requires that the center provide services and/or equipment that provide an active support to the community instead of passive/informational support. Examples of this may include:

- Afterschool learning programs, homework clubs, tutoring services, computers with broadband internet and educational software or online learning capabilities etc.
- Resume-writing and/or interview skills workshops, certification courses that have no specialized pre-requirements to enroll such as Microsoft Office courses, CPR training, CNA certification, etc., computers with broadband access and other equipment through which users may search for jobs online or interview remotely.
- Vaccination clinics, mental health counselling, regular consultations with trained professionals such as a nutritionist who may provide targeted recommendations to improve the health outcomes of participants, computers with broadband access and supporting equipment to enable tele-health appointments.

By "jointly" Treasury requires that all three programs should be enabled concurrently at the facility. While not all services may be offered at all hours, there should be the possibility for someone to "walk in" and be able to access some level of support that directly assists them. The provision of computers with broadband access available for all three uses allows for this requirement to be met with ease and flexibility.

Some examples of Multi-Purpose Community Facility Projects are:

- Projects to construct or improve full-service community schools that provide a comprehensive academic program to their students and adult education in the community at large; health monitoring to their students and the community; and workforce training or career counseling services that provide community members with the knowledge needed to engage in work, including digital literacy training programs.

- Projects to construct or improve libraries that provide public access to the internet for purposes including work, education, and health monitoring such as offering digital skills programs and support for community members engaging in virtual learning.

- Projects to construct or improve community health centers that, in addition to engaging in health monitoring, provide a broader range of services to the communities they serve, including activities such as access to job counseling employment services, as well as health education classes or internship programs for medical professionals.

Projects must be designed to jointly and directly enable work, education, and health monitoring, but these activities need not be the exclusive function or purpose of the Project. For example, a building, such as a library or community center providing the public with access to computers with high-speed internet service, can meet this criterion even if the completed Project is also used for other functions, such as community recreational activities.

Stage 2 Evaluation

All Stage 2 applications are due on October 13, 2023, by 11:59pm. PRO is unable to offer any more extensions and advises all applicants to submit complete and comprehensive applications

on time. The State recognizes that there may be changes to a municipality's application after it has been submitted. Applicants will be able to update or modify their applications after the October 13, 2023, deadline. However, PRO will not enter into subaward agreements or transfer any funds until the application is finalized. A finalized application is one that is comprehensive and presents a viable and compliant project.

All applications received by 11:59pm on October 13, 2023, will be sorted into two categories:

a. Complete & comprehensive (Category C): applications that have addressed each question/prompt on the application and provide adequate information to facilitate a compliance and viability review.

b. Incomplete or needing further development (Category I): applications that have not provided any or adequate information to questions/prompts in the application that are needed to perform a compliance and viability review.

Category C: All Category C applications will be reviewed by PRO and may be forwarded to the State's subject matter experts, the Rhode Island Department of Elementary and Secondary Education (RIDE), the Rhode Island Department of Labor and Training (DLT), the Rhode Island Department of Health (DOH), and the Rhode Island Division of Capital Asset Management and Maintenance (DCAMM) to determine compliance and viability of the proposed project. All municipalities with Category C applications that are judged as compliant and viable will begin the process of entering into a subaward agreement with the State for the compliant and viable project.

If during the review process any aspect of a Category C application is found non-compliant or non-viable, PRO will reach out to the municipality and provide it with the feedback on the areas of the application that need to be addressed to make the proposed project compliant and/or viable. The municipality will be allowed 1-3 weeks to update their application.

Category I: All Category I applications will receive notification from PRO to complete or modify their applications. Category I applicants will have until December 11, 2023, at 11:59pm to make any necessary changes to bring their applications into compliance with State and U.S. Treasury requirements. Municipalities should note that taking longer to complete an application could interfere with their project's viability since a late start could result in their inability to complete the project and operationalize the programs by the Treasury deadline of December 31, 2026.

As Category I applications are completed, they will be recategorized as Category C and follow the same process as described above.

<u>Next Steps</u>

1. **Stage 3:** Once Stage 2 applications are determined to be in adherence with U.S. Treasury Guidance, PRO will open Stage 3 on the eCivis portal for the qualifying municipalities. Stage 3 is an attestation form that confirms that applicants understand the terms and compliance

requirements of the grant. Applicants will indicate their acceptance of the CLC grant requirements by initialing all attestation statements appropriately and obtaining a final signature of the town executive.

2. **Subaward Agreement:** Upon completion of Stage 3, municipalities will receive a draft subaward agreement which they should be prepared to review and sign in an expeditious manner. The signing of the subaward agreement will formalize the municipality's participation in the CLC grant and make them eligible to receive the first payment of their CLC funds.

3. **1st Payment:** Municipalities should expect their first payment to arrive within two weeks of formalizing their subaward agreement. This payment will be based on their budget sheet submitted as part of the Stage 2 application.

4. **Monitoring:** Formalizing the subaward agreement will place the applicants into the monitoring phase of the CLC grant. PRO's monitoring of the CLC grant applicants will include a project kickoff meeting and a site visit which, weather permitting, may be combined. After project kickoff, grantees should expect desk reviews of their grant twice a year and project check-ins every 4 to 6 weeks throughout the period of performance.

5. **Reporting:** For those municipalities whose subaward agreement is formalized before January 1, 2024, municipalities should expect their first report to PRO to be submitted by January 10, 2024. For municipalities whose subaward agreement is finalized between January 1, 2024, and March 31, 2024, the first report will be due by April 10, 2024. PRO will conduct training on the reporting templates and requirements to assist grantees.

FAQs

Q. Is the Learn365RI grant the same as the Community Learning Centers grant?

A. No. While signing the Learn365RI compact is an eligibility criterion for the CPF Community Learning Centers grant, they are two separate grants with separate applications and requirements. Please refer to the attached guidance for more information to help distinguish between the two grants.

Q. If there is uncertainty about the choice of site where the CLC funding will be invested, should the municipality submit multiple applications for alternative sites?

A. It is not advisable to submit multiple applications for the same grant unless it is for separate projects all individually funded by CLC funds. The State recognizes, however, that not all Stage 2 applications will be equally developed at this point. PRO recommends that the applications be as specific and fleshed out as possible. In the case where there may still be some ambiguity, applicants should transparently state that the certain aspects of the grant could change soon and include the alternatives in the application.

Q. How should a municipality apply for multiple projects into which they intend to invest CPF CLC funding?

A. If a municipality is planning to acquire, build, and/or renovate more than one capital asset with the CLC grant, then a separate application should be submitted for each capital asset. Separate applications protect a municipality's funding for their other assets should one capital asset be unable to reach completion and operate programs by December 31, 2026 (i.e., only the funding associated with the unfinished capital asset would be returned to U.S. Treasury not all of a municipality's CLC allocation).

Q. How long after the October 13, 2023, deadline can a municipality continue to update their application.

A. Consistent with their evaluation timeline, PRO will provide municipalities with incomplete or non-compliant applications until the end of November to update their application for comprehensive review. PRO will not formalize subaward agreements if the application is not complete, compliant, and viable. Of these three benchmarks, viability declines as time passes. As a northeastern state, Rhode Island experiences a compressed construction window. There is also a limited pool for construction-related vendors who may be engaged to complete these projects. Projects that do not conform to the key milestones shared by PRO would be considered to have low viability. The State will not authorize subawards after February 1, 2024.

Q. Will there be more reallocations of the CLC funds?

A. As the grant progresses there may be municipalities who either opt out, are unable to complete a compliant application, or whose projects are judged as noncompliant when reviewed in strict adherence with U.S. Treasury's guidance. In such cases, the allocation of the disqualified municipality will be reallocated across all qualifying municipalities based on the Treasury approved formula.