

To: File
From: COUNTY
Date: 7/14/2023
Re: ARPA Eligibility for Senior Center Marketing Program

Purpose and Overview

This memo documents the decision-making process that Livingston County (“the County”) undertook to assess the eligibility of the Senior Center Marketing Program to address public health and negative economic impacts caused or exacerbated by the pandemic (e.g., programming, and activities were stopped) and addressing the critical outreach and communication needs of an aging community. On December 12, 2022, the County’s Board of Commissioners approved Resolution 2022-12-192, which authorized \$450,000 to support six (6) senior centers in Livingston County. This \$36,000 project (part of \$450,000 approved in Resolution 2022-12-192) is a marketing program to inform residents of the availability of these facilities and the services they offer.

Background

On March 11, 2021, the United States Congress passed the American Rescue Plan Act (ARPA) of 2021.¹ ARPA is a \$1.9 trillion economic stimulus package to respond the negative public health and economic impacts of the COVID-19 health pandemic. The State and Local Fiscal Recovery Fund (SLFRF), included in the stimulus package, provide \$350 billion for “eligible state, local, territorial, and tribal governments to respond to the COVID-19 emergency and bring back jobs.”² The United States Treasury (“the Treasury”) published the Final Rule for SLFRF eligibility on January 6, 2022 with an effective date of April 1, 2022.³

The Final Rule outlines four broad categories of funding eligibility:

- 1) To respond to the public health emergency or its negative economic impacts, including assistance to households, small businesses, and nonprofits, or aid to impacted industries such as tourism, travel, and hospitality;
- 2) To respond to workers performing essential work during the COVID-19 public health emergency by providing premium pay to eligible workers;
- 3) For the provision of government services to the extent of the reduction in revenue due to the COVID-19 public health emergency relative to revenues collected in the most recent full fiscal year prior to the emergency; and
- 4) To make necessary investments in water, sewer, or broadband infrastructure.⁴

Description of Need

¹ 117th Congress. H.R.1319: American Rescue Plan Act of 2021. Accessed July 29, 2021.

<https://www.congress.gov/bill/117th-congress/house-bill/1319/text>

² U.S. Department of Treasury. Coronavirus State and Local Fiscal Recovery Funds. Accessed July 29, 2021.

<https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/state-and-local-fiscal-recovery-funds>

³ U.S. Department of Treasury. Coronavirus State and Local Fiscal Recovery Funds: Final Rule. Accessed April 26, 2022. <https://home.treasury.gov/system/files/136/SLFRF-Final-Rule.pdf>

⁴ Ibid

⁵<https://www.livgov.com/hscb/PublishingImages/Pages/senioreeds/Livingston%20Senior%20Service%20Comparison%20Report%20FINAL.pdf>

The COVID-19 pandemic has negatively impacted senior centers in Livingston County and address the needs of an aging community. According to the Livingston Leadership Council on Aging, residents aged 60 and older currently comprise 24% of Livingston County's population, and the 60 and older population is projected to increase by over 1,000 people each year. Livingston County currently has six (6) active senior centers providing varying degrees of service to the county's senior population.

The COVID 19 pandemic negatively impacted day-to-day operations of all six senior centers in Livingston County. The senior centers faced financial hardships during the pandemic which resulted in the loss of programs, staff, equipment, and more. As a result, seniors who regularly participate in center programs and/or rely on services were negatively impacted socially, physically, and mentally.

Project Overview and Objectives

The six senior centers in Livingston County recently received relief funds from the County due to financial harm caused by COVID-19. Those funds will be used to develop resources, facilities, and programming focused on long term support of the 18.1% of Livingston residents who are 65 years of age or older, as reported by census.gov.

The Senior Center Marketing Program request is designed to inform residents of the availability of these facilities, services, and activities, to engage them in ongoing participation, and to connect with vulnerable and at-risk individuals throughout our county. The program will focus on a variety of themes intended to optimize physical, mental, and financial health.

The Senior Center Marketing Program is requesting a total amount of ARPA funds of \$36,000 over three years to accomplish its objectives.

The Senior Center Marketing Program will initiate the program with brainstorming and planning sessions that include Senior Center Directors, stakeholders from local communities and the county, and marketing enthusiasts from related organizations. The end goal is to achieve the maximum results and market penetration with these dollars. As they collaborate with other service organizations to leverage their marketing dollars, they will be very attentive to the ARPA guidelines regarding beneficiaries of these funds.

Eligibility Considerations

The County determined that supporting senior centers in the community is an eligible use of SLFRF dollars as a response to both public health and economic impacts of the pandemic. The Final Rule provides a framework for recipients to identify eligible uses of these funds:

- 1) Identify a COVID-19 public health or negative economic impact on an individual or a class.** Recipients should identify an individual or class that is "impacted" or "disproportionately impacted" by the COVID-19 public health emergency or its negative economic impacts as well as the specific impact itself.
- 2) Design a response that addresses or responds to the impact.** Programs, services, and other interventions must be reasonably designed to benefit the individual or class that experienced the impact. They must also be related and reasonably proportional to

the extent and type of impact experienced. For example, uses that bear no relation or are grossly disproportionate to the type or extent of the impact would not be eligible.⁵

Identifying an Impacted Class

The Final Rule provides the following guidance on identifying impacted classes:

[A] recipient may identify such impacts for a class of households, small businesses, or nonprofits. In such cases, the recipient need only demonstrate that the household, small business, or nonprofit is within the relevant class. ... In identifying an impacted class and responsive program, service, or capital expenditure, recipients should consider the relationship between the definition of the class and proposed response.⁶

The Treasury does not outline specific criteria that recipients must use to identify these classes. Rather, it suggests that they consider (1) the relationship between the defined class and the proposed response and (2) the population or geographic basis of the identified class. Recipients may use qualitative and/or quantitative data, as available, to inform these designations, though there is no stated threshold for these determinations.⁷

The County identified two impacted classes that will benefit from the administration of this program: the senior centers and the individuals that participate in offered programs.

The County required the senior centers to complete a "Project Information Form" to substantiate the impacts to both the organization's programming and financial stability. The Senior Center Marketing Program provided the following information about the impacts of the pandemic:

- *"The key word here is "isolation". Prolonged isolation during COVID shutdown was particularly detrimental to the at-risk senior population. It has led to newly embedded changes in social habits that result in a lack of connections with others, and lack of engagement with resources that can help them deal with the circumstances of aging. When the pandemic hit, Senior Centers in Livingston County jumped into "survive" mode, by addressing these circumstances as aggressively as possible. We are now regaining our legs in "thrive" mode. Work still needs to be done to re-establish the vital norm of social interaction."*

Additionally, elderly populations are widely recognized as an impacted class of the pandemic. Although the Final Rule does not formally recognize this group, many articles have been written on the physical, mental, emotional, social, and financial impacts to this population. The National Council on Aging recognizes senior centers as a critical access point to connecting aging populations to vital community services and social connection through the provision of nutrition

⁵ U.S. Department of the Treasury. Coronavirus State & Local Fiscal Recovery Funds: Overview of the Final Rule. Accessed April 27, 2023. <https://home.treasury.gov/system/files/136/SLFRF-Final-Rule-Overview.pdf>

⁶ U.S. Department of the Treasury. Coronavirus State & Local Fiscal Recovery Funds: Final Rule. Accessed April 27, 2023. <https://www.govinfo.gov/content/pkg/FR-2022-01-27/pdf/2022-00292.pdf>

⁷ *ibid*

and wellness programming, transportation services, public benefits counseling, social, recreational, and education programs, and more.⁸

Designing a Response

The County opted to support the Senior Center Marketing Program through collaboration of all six Senior Center Directors. The County recognized that while each senior center provided responses for immediate and long-term support to address the impact of COVID, the additional Marketing Program provides critical outreach to the senior community.

Consistent with other examples of assistance programs for non-profits, small businesses, and impacted industries, the County determined that the Senior Center Marketing Program may use this grant fund for SFLRF-eligible operations and/or programming costs that will benefit the outreach to the senior community.

Reporting Requirements

The Senior Centers Marketing Program will be reported to Treasury as part of the Senior Centers Grant Program. Because the awardee will be using funds for marketing purposes that serve both public health and negative economic impacts, the County determined that 2.37 *Economic Impact Assistance: Other* is the most appropriate category for required reporting.⁹

In each quarterly Performance and Expenditure Report to the U.S. Treasury, the County acknowledges it must provide the following programmatic data:

- Brief description of structure and objectives of assistance program(s), including public health or negative economic impact experienced
- Brief description of how a recipient's response is related and reasonably and proportional to a public health or negative economic impact of COVID-19
- The dollar amount of the total project spending that is allocated towards evidence-based interventions
- Indication if a program evaluation of the project is being conducted¹⁰

This expenditure category also requires the recipient to identify the project demographic distribution for this project. The following option should be selected on the report:

- Other households or populations that experienced a negative economic impact of the pandemic other than those listed above (please specify: aging population)
- Impacted Non-Profits that experienced a negative economic impact of the pandemic¹¹

⁸ National Council on Aging. Get the Facts on Senior Centers. Accessed April 27, 2023.

<https://ncoa.org/article/get-the-facts-on-senior-centers>

⁹ U.S. Department of the Treasury. State and Local Fiscal Recovery Funds Compliance and Reporting Guidance, Version 3.0. Accessed April 26, 2022. <https://home.treasury.gov/system/files/136/SLFRF-Compliance-and-Reporting-Guidance.pdf>

¹⁰ U.S. Department of Treasury. State and Local Fiscal Recovery Funds Compliance and Reporting Guidance, Version 3.0. Accessed April 4, 2022. <https://home.treasury.gov/system/files/136/SLFRF-Compliance-and-Reporting-Guidance.pdf>

¹¹ U.S. Department of Treasury. State and Local Fiscal Recovery Funds: Project and Expenditure Report User Guide, Version 2.0. Accessed May 17, 2022. <https://home.treasury.gov/system/files/136/April-2022-PE-Report-User-Guide.pdf>