Date: November 1, 2021

To: The Honorable Chair and Members
    Pima County Board of Supervisors

From: Jan Lesher
    Chief Deputy County Administrator

Re: The American Rescue Plan Act

The American Rescue Plan Act, which was signed into law on March 11, 2021 provides Pima County a total of $203,421,688 to assist with a variety of relief measures in response to the COVID-19 pandemic. On August 10, 2021 the Board of Supervisors approved the spend plan for the funds. The first performance report to the federal government was submitted, as required, on August 31, 2021. That report is attached. The next project and expenditures report is to be submitted on January 31, 2022.

Grants Management & Innovation is working with project departments and subrecipients to further refine budgets and to establish performance metrics. A progress report will be submitted to the Board mid-December with an updated budget for review and approval.

JKL/mp

Attachment

c: Carmine DeBonis, Jr., Deputy County Administrator for Public Works
    Francisco Garcia, MD, MPH, Deputy County Administrator & Chief Medical Officer, Health and Community Services
Note: The Recovery Plan Performance Report will provide the public and Treasury information on the projects that recipients are undertaking with program funding and how they are planning to ensure program outcomes are achieved in an effective, efficient, and equitable manner. While this template includes the minimum requirements for the Recovery Plan, each recipient is encouraged to add information to the plan that they feel is appropriate to provide information to their constituents on efforts they are taking to respond to the pandemic and promote an equitable economic recovery.

Each jurisdiction may determine the general form and content of the Recovery Plan, as long as it meets the reporting requirements, and recipients are encouraged to tailor this template to best meet their needs. Use of infographics, tables, charts, pictures, case studies, and other explanatory elements are encouraged.
Notes on using this template

All States and territories, and metropolitan cities and counties with a population that exceeds 250,000 residents that are recipients of State and Local Fiscal Recovery Funds (SLFRF) awards are required to produce a Recovery Plan Performance Report (the "Recovery Plan"). The Recovery Plan provides information on the recipient’s projects and how they plan to ensure program outcomes are achieved in an effective and equitable manner. It will include key performance indicators identified by the recipient and some mandatory indicators identified by Treasury. Each annual Recovery Plan must be posted on the public-facing website of the recipient by or on the same date that the recipient submits the report to Treasury.

The initial Recovery Plan will cover the period from the date of award to July 31, 2021 and must be submitted to Treasury by August 31, 2021. Thereafter, the Recovery Plan will cover a 12-month period and recipients will be required to submit the report to Treasury within 30 days after the end of the 12-month period (by July 31).

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<td>July 1, 2026 – December 31, 2026</td>
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Instructions:

This document is meant as a suggested template for applicable SLFRF recipients to assist them in submitting their Recovery Plan. Recipients should consult the SLFRF Guidance on Recipient Compliance and Reporting Responsibilities (Reporting Guidance) located at https://home.treasury.gov/system/files/136/SLFRF-Compliance-and-Reporting-Guidance.pdf for detailed guidance on the submission of this report.

Treasury encourages Recipients to tailor this report to best meet their needs in terms of format and content. Treasury recommends the use of infographics, tables, charts, pictures, case studies, and other explanatory elements in describing their programs.

Text in italics represents the requirements from the Reporting Guidance and is meant to serve as a reference as recipients prepare their Recovery Plan. This instructions page and the text in italics should be removed before the final transmitted report is published and submitted to Treasury.

Additional information around Expenditure Categories is located in Appendix 1 of the Reporting Guidance.

For More Information

More information about the State and Local Fiscal Recovery Fund program and associated reporting requirements are located at www.treasury.gov/SLFRP.

Questions on reporting, eligible uses, or other general topics should be directed to SLFRP@treasury.gov.
Pima County
2021 Recovery Plan

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GENERAL OVERVIEW

Executive Summary

In this section, provide a high-level overview of the jurisdiction’s intended and actual uses of funding including, but not limited to: the jurisdiction’s plan for use of funds to promote a response to the pandemic and economic recovery, key outcome goals, progress to date on those outcomes, and any noteworthy challenges or opportunities identified during the reporting period. See Section C(1) on page 24 of the Reporting Guidance for additional information.

This report details planned spending for $75,684,578 of $203,422,668 in total funding received by Pima County (“The County”) in American Rescue Plan Act - State and Local Fiscal Recovery Funds (ARPA-SLFRF). The projects described here were approved by Pima County Board of Supervisors (BOS) as of the end of Annual Report Period 1 (May 10, 2021 – July 31, 2021). Planned expenditures for these projects in Annual Report Period 1 total $8,933,954.61.

Other intended uses of ARPA-SLFRF (totaling $127,738,090) had not been approved by Pima County BOS as of July 31, 2021, and will be detailed in an updated Recovery Plan Performance Report, which the County will provide within 60 days of approval by the legislature or other governance entities (in this case, Pima County BOS), per Treasury SLFRF reporting guidance.1

The County plans to use ARPA-SLFRF to support its public health pandemic response by defraying supplies and services costs incurred by the Pima County Health Department to address the public health emergency. Uses of funding approved by the Pima County BOS during the reporting period (i.e., through July 31, 2021) include personnel expenses for the COVID-19 public health response, and supplies and services for continued testing, vaccine distribution, personal protective equipment, and additional supplies and services to support pandemic response, as well as communications. Expenditures in the reporting period total $8,873,762.26.

The County further intends to use funding to support a variety of efforts to promote economic recovery by mitigating negative economic impacts of the pandemic. ARPA-SLFRF projects that were approved by Pima County BOS during the reporting period include Emergency Eviction Legal Defense Services, a new division providing legal and navigation services to tenants at risk for eviction, and JobPath, an established job skills training program that assists lower income students and workers to obtain diplomas and/or technical certifications leading to higher income jobs and a more skilled local workforce. Expenditures in the reporting period total $55,428.01.

Additionally, the County will use funding for revenue replacement to ensure provision of government services to the extent of the reduction in the County’s general revenue, calculated according to the methodology provided in the Interim Final Rule. There were no expenditures in the reporting period.

The County also intends to use ARPA-SLFRF to expand of grants management staff to support tripling of grant revenue, assuring the organization’s ability to meet programmatic and fiscal

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requirements including conducting internal process and impact evaluations and subrecipient monitoring as required by Treasury and Uniform Grant Guidance (2 C.F.R. 200). Expenditures in the reporting period total $4,764.34.

The County’s outcome goals for ARPA-SLFRF align directly with intended uses and priorities of the federal government. With ARPA-SLFRF, the County strives to mitigate the COVID-19 public health emergency and promote a robust economic recovery for all people in Pima County through effective, efficient, and equitable stewardship of funds received.

The County’s ARPA-SLFRF projects are designed to promote equity by using the organization’s capacity to disaggregate programmatic data to fulfill its commitment to this principle to close gaps in pursuit of universal levels of service. Disaggregating data by characteristics that can be analyzed to determine differences in access to or benefits from a program or service, is a basic step for any jurisdiction towards being able to identify sources and magnitude of differences among groups. Many County departments and programs, including programs receiving ARPA-SLFRF like JobPath, already disaggregate participation and outcome data on a variety of demographic and geographic characteristics, including gender, race/ethnicity, and residence.

Pima County BOS “Resolution Declaring Racial and Ethnic Health Inequities and Income Inequality in Pima County to be Public Health Crisis” affirms the County’s commitment by asserting that “systemic racism and poverty negatively impact the social factors that determine a person’s health, including access to safe and affordable housing, active recreational opportunities, well-paying jobs, quality early childhood education, clean air and water, and health care and health insurance.” To better understand how issues disproportionately affect people living in the region, County departments use data-driven best practices such as qualified census tract data, race and ethnicity data, geographic data, and social determinants of health.

To date, the County has encountered the following challenges and opportunities. Emergence of the Delta variant in mid-2021 has redirected the nature of the County’s overarching pandemic response to once again concentrate more centrally on mitigation efforts, including testing and vaccination. These efforts have only increased in importance in the context of returns to pre-pandemic activities, including in-person schooling at all levels, as well as variable application of community mitigation strategies like masking and social distancing. Resource constraints have re-emerged as inpatient volumes further strain hospital capacity across the region.

Additionally, the gap in funding between previous federal Coronavirus Relief Funding allotments and the ARPA-SLFRF funding period has imposed a significant strain on local jurisdictions to bear the full burden of the pandemic response. In this respect, Pima County is reconciling a reduction in state investment in local COVID-19 response efforts. ARPA-SLFRF is critical and timely as the County continues to ramp up its public health emergency response, specifically by improving equitability and accessibility of ongoing COVID-19 testing and vaccination efforts. In light of COVID-19 variants and public policy shifts (such as the end of eviction moratoria), local jurisdictions must be adequately equipped to initiate and maintain robust and equitable responses to evolving public health and economic conditions.

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Uses of Funds

Describe in further detail your jurisdiction’s intended and actual uses of the funds, such as how your jurisdiction’s approach would help support a strong and equitable recovery from the COVID-19 pandemic and economic downturn. Describe any strategies employed to maximize programmatic impact and effective, efficient, and equitable outcomes. Given the broad eligible uses of funds and the specific needs of the jurisdiction, explain how the funds would support the communities, populations, or individuals in your jurisdiction.

This report details planned spending for $75,684,578 of $203,422,668 in total funding received by Pima County (“The County”) in American Rescue Plan Act - State and Local Fiscal Recovery Funds (ARPA-SLFRF). The projects described here were approved by Pima County Board of Supervisors (BOS) as of the end of Annual Report Period 1 (May 10, 2021 – July 31, 2021). Planned expenditures for these projects in Annual Report Period 1 total $8,933,954.61.

Other intended uses of ARPA-SLFRF (totaling $127,738,090) had not been approved by Pima County BOS as of July 31, 2021, and will be detailed in an updated Recovery Plan Performance Report, which the County will provide within 60 days of approval by the legislature or other governance entities (in this case, Pima County BOS), per Treasury SLFRF reporting guidance.3

Address how you are promoting each of the following Expenditure Categories, to the extent they apply:

a. Public Health (EC 1)

Pima County has prioritized Public Health expenditures in order to further address and mitigate the COVID-19 pandemic. Specifically, Pima County will be funding personnel expenses for the COVID-19 public health response, and supplies and services for continued testing, vaccine distribution, personal protective equipment, and additional supplies and services to meet the need of the pandemic response in Pima County. This funding will be used to defray supplies and services costs incurred by the Pima County Health Department to address the public health emergency.

Public Health: $64,131,450 (32% of total ARPA-SLFRF revenue)

Intended and actual uses of the funds include:

- Payroll and covered benefit expenses for Health Department staff responding to the COVID-19 public health emergency.
- Health Department supplies and services to mitigate and contain COVID-19, including vaccination, testing, contact tracing, and personal protective equipment.

b. Negative Economic Impacts (EC 2)

Due to the precipitous declines in economic activity and employment, as well as direct impacts of COVID-19 illness, exposure, quarantine and caregiving, tens of thousands of households in Pima County are at risk of eviction, particularly with the looming expiration of the moratorium on evictions. In many cases, access to counsel can increase the likelihood of a settlement with the

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landlord and eviction prevention, particularly in combination with Pima County’s Housing and Utility Assistance programs.

Pima County’s new Office of Emergency Eviction Legal Defense Services (EELS), a division created at the direction of the Pima County BOS, will provide legal services through competitive procurement of private lawyers or lawyers with one or more nonprofits to provide limited-scope or full representation to tenants, as appropriate. Funds may also be used to train lawyers who don’t have experience in eviction cases. EELS will also provide navigation services and Eviction Prevention Clinics to provide information about eviction process to litigants and connect parties with resources.

Economically, services like education, job training and job placement are critical for the recovery of our community. Many adults work multiple minimum wage jobs and yet are still unable to support their families, while local employers struggle to find skilled employees to meet their workforce needs. COVID-19 has had detrimental effects on the local economy, with layoffs and modified working conditions. Changes to the labor market, such as fewer hospitality and retail jobs in addition to ongoing automation of office and factory jobs, mean many workers won’t have jobs to return to and will need to reskill in order to reenter the workforce.

Since its inception in 1998, the JobPath program has been a primary support mechanism to assist students and lower income workers in Pima County in their quest to advance their training with a goal to obtain diplomas and/or technical certifications leading to higher income jobs. The JobPath model includes providing household assistance to assure that students do not face economic barriers to completing their chosen training program, including wrap-around case management services and financial aid for both school and non-school expenses (e.g., childcare, car repairs, and minor emergencies).

Negative Economic Impacts of COVID-19: $5,003,500 (2% of total)

Intended and actual uses of the funds include:

- Assistance to households and disproportionately impacted populations and communities that address housing insecurity, lack of affordable housing, or homelessness:
  - Emergency Eviction Legal Services Program
- Investment in job training programs for displaced workers, unemployed and low income individuals:
  - Expansion of JobPath program

c. Services to Disproportionately Impacted Communities (EC 3)
d. Premium Pay (EC 4)
e. Water, sewer, and broadband infrastructure (EC 5)
f. Revenue Replacement (EC 6)

Revenue Replacement: $3,066,128 (2% of total)

Intended and actual uses of the funds include:

- Provision of government services to the extent of a reduction in the recipient’s general revenue, calculated according to the methodology provided in the Interim Final Rule.

g. Administrative and Other (EC 7)
Administrative and Other Expenses: $3,483,500 (2% of total)

Intended and actual uses of the funds include:

- Expansion of grants management staff to support tripling of grant revenue and assure ability to staff to meet programmatic and fiscal requirements, including ability to conduct internal process and impact evaluations and subrecipient monitoring as required by Treasury and Uniform Grant Guidance (2 C.F.R. 200)

Where appropriate, include information on your jurisdiction’s use (or planned use) of other federal recovery funds including other programs under the American Rescue Plan such as Emergency Rental Assistance, Housing Assistance, and so forth, to provide broader context on the overall approach for pandemic recovery.

See Section C(2) on page 24 of the Reporting Guidance for additional information.

Due to the precipitous declines in economic activity and employment, as well as direct impacts of COVID-19 illness, exposure, quarantine and caregiving, tens of thousands of households in Pima County are at risk of eviction, particularly with the looming expiration of the moratorium on evictions. In many cases, access to counsel can increase the likelihood of a settlement with the landlord and eviction prevention, particularly in combination with Pima County’s Housing and Utility Assistance programs.

EELS, a new division created at the direction of Pima County BOS, will provide legal services through competitive procurement of private lawyers or lawyers with one or more nonprofits to provide limited-scope or full representation to tenants as appropriate. Funds may also be used to train lawyers who do not have experience in eviction cases. EELS will also provide navigation services and Eviction Prevention Clinics to provide information about the eviction process to litigants and connect parties with resources.

Promoting equitable outcomes

In this section, describe efforts to date and intended outcomes to promote equity. Each annual report to follow must provide an update, using qualitative and quantitative data, on how the recipients’ approach achieved or promoted equitable outcomes or progressed against equity goals during the performance period.

Describe efforts to promote equitable outcomes, including how programs were designed with equity in mind. Include how your jurisdiction will consider and measure equity at the various stages of the program, including:

a. Goals: Are there particular historically underserved, marginalized, or adversely affected groups that you intend to serve?

Located in southern Arizona, Pima County has roughly one million residents and five incorporated jurisdictions (the City of South Tucson, City of Tucson, and the towns of Marana, Oro Valley, and Sahuarita). The majority of the county population resides in the City of Tucson. Pima County is a unique jurisdiction, sharing a border with the state of Sonora, Mexico. Pima County also includes two Native American tribal reservations: The Pascua Yaqui Tribe and the Tohono O’odham Nation.
The Pima County Board of Supervisors (BOS) December 1, 2020, “Resolution Declaring Racial and Ethnic Health Inequities and Income Inequality in Pima County to be Public Health Crisis” notes the continued presence “year after year, grave health disparities between different racial/ethnic and low income populations, not only in Pima County of course, but across the state and the nation.” Specifically, the resolution identifies health disparities experienced by Pima County’s African American, Hispanic, and Native American populations, as well as the assertion that “systemic racism and poverty negatively impact the social factors that determine a person's health, including access to safe and affordable housing, active recreational opportunities, well-paying jobs, quality early childhood education, clean air and water, and health care and health insurance.”

Pima County is defined as a Medically Underserved Area (MUA) by Arizona Department of Health Services (ADHS) in its Arizona Medically Underserved Area (AzMUA) biennial report. According to state reporting, most qualified census tracts (QCTs) in Pima County are considered MUAs. Across Pima County, thousands of adults and children are uninsured despite the increase in insured residents through the Affordable Care Act (ACA), which expanded Medicaid access across the state. According to U.S. Census Bureau American Community Survey estimates for 2019, 17% of Pima County residents live below the federal poverty level. Of the 240 census tracts in Pima County, 43 (18%) are considered QCTs, and these areas are spread across the county in urban, rural, and tribal regions, including both incorporated municipalities and unincorporated areas of the county.

Contributors to the County’s 2018 Community Health Needs Assessment identified access to services was identified as a key priority for Pima County. This included access to services that demonstrate cultural competency and display a comprehensive approach to reaching services, working to build a more robust network of community resources and referral tools. As COVID-19 swept through Pima County, the importance of an equitable pandemic response in offsetting the impact levied on area hospitals, emergency rooms, and ICUs proved essential. Ensuring adequate staffing and supplies for Pima County Health Department have been paramount in creating an environment for accessible and free COVID-19 testing, vaccination, and pandemic resources to the community.

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5 Ibid.
Prior to and throughout the pandemic response, the County has worked diligently to implement data-driven approaches that best meet the needs of the diverse needs of people living in the region, providing equitable and accessible emergency health and wraparound services. Key practices include synthesis of data on QCTs, geography, demographics, and social determinants of health to better understand the pandemic’s disproportionate effects on people across the County. Additionally, through the pandemic response, the County has utilized additional tools such as Social Vulnerability Index (SVI) and health equity oversight to assure that resources are deployed where they are needed most throughout the county.

Prior to the COVID-19 pandemic, Pima County stakeholders elected to prioritize looking at community health needs through the lens of the social determinants of health framework, focusing on conditions in the environments in which people are born, live, work, play, worship and age that affect a wide range of health, functioning, and quality-of-life outcomes and risks. This holistic and data-driven approach promoting access to comprehensive services aims to assure that Pima County meets the physical, mental, social, and economic needs of people in the region. With the onset of the COVID-19 pandemic, the County augmented this approach to identify disproportionately affected residents of the county, to assure that robust testing, vaccinations, and wrap-around services are prioritized for the populations most at-risk and most in need, and to inform transparent public health data reporting.

The County has prioritized ARPA-SLFRF projects aimed at assuring that people have equitable access to public health services, community services, economic resources, and infrastructure in a multipronged and holistic approach to service delivery.

b. Awareness: How equal and practical is the ability for residents or businesses to become aware of the services funded by the SLFRF?

Pima County will report via its website on all services funded by ARPA-SLFRF. This will include funding allocated, by expenditure category, along with performance, and evaluation reporting associated with the access, utilization and impact of these funds in the community. Pima County Grants Management and Innovation (GMI) will coordinate data and evaluation activities for ARPA-SLFRF-funded projects to ensure that outreach and service delivery are equitable and address issues that meet needs impacting disproportionately affected members of the community.

c. Access and Distribution: Are there differences in levels of access to benefits and services across groups? Are there administrative requirements that result in disparities in ability to complete applications or meet eligibility criteria?

Pima County’s commitment to ensuring equitable access to benefits and services is exemplified by the organization’s robust use of population health data and reporting: including, but not limited to, data on demographics (including race and ethnicity), geography, QCTs, and SVI assessments, as well as targeted deployment of emergency response teams to promote equitable access to services. In designing accessible community pandemic-response resources, such as testing efforts and vaccination clinics, the County has developed a cross-functional effort that aligns SVI
and QCT data alongside epidemiological statistics, resulting in planning and design driven by up-to-date information.

d. Outcomes: Are intended outcomes focused on closing gaps, reaching universal levels of service, or disaggregating progress by race, ethnicity, and other equity dimensions where relevant for the policy objective?

While the County’s ‘Resolution Declaring Racial and Ethnic Health Inequities and Income Inequality in Pima County to be a Public Health Crisis’ advocates for “collecting, analyzing and reporting public health data by age, race, ethnicity, gender, disability, neighborhood, and other sociodemographic characteristics, including adding such data to the Healthy Pima Community Health Assessments,” the spirit of this resolution goes beyond analyzing the data to acting to close gaps.9

All proposed ARPA-SLFRF projects are vetted and approved by the same Pima County leadership body that approved this resolution. Plans are based on data-driven needs, which span across public health impact, negative economic impacts, building the workforce to better respond to the public health crisis and rebuild across the community. The County’s approach to this spending directs improved, more comprehensive access to services across the region via the array of wraparound health, economic and community services funded.

All data designs and evaluations will center on the intentional planning of data collection, analysis, and dissemination to assure that projects are assessed for progress towards the greater goals of creating an equitable network of services and pivoting when service delivery is found to not be addressing community needs.

Describe how your jurisdiction’s planned or current use of funds prioritizes economic and racial equity as a goal, names specific targets intended to produce meaningful equity results at scale, and articulates the strategies to achieve those targets.

The County BOS resolution on racial and ethnic health inequities and income inequality includes several specific targets that directly align with its proposed ARP spending. Specifically, the resolution:

5. Advocates for economic development projects and opportunities designed to increase employment and income opportunities as a modality to reduce and eventually eliminate income inequality.
6. Supports the expansion of continuing education, job training and workforce development programs as a pathway to economic self-sufficiency and stability for Pima County residents.10

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10 Ibid.
The County’s ARPA-SLFRF projects described in this report, namely JobPath, respond specifically to these aims. A July 6, 2021 Pima County BOS memorandum on JobPath describes the program’s capacity to work with the Pima County Economic Development Office to identify disparities in program participation, including no students identified by tribal reservation geography in Annual Report Period 1.11 The program’s draft strategic plan defines one goal for the program moving forward to be to “advocate for the removal of workforce barriers through participation in community planning and strategy discussions to drive equity and justice.” 12 These high-level gaps and strategic goals can be met by specific objectives for performance during the ARPA-SLFRF funding period to leverage the program’s demonstrated ability to disaggregate program participation by demographic and geography into tangible progress towards equity in both participation and programmatic outcomes.

Explain how your jurisdiction’s overall equity strategy translates into the specific services or programs offered by your jurisdiction in the following Expenditure Categories:

a. **Negative Economic Impacts (EC 2):** assistance to households, small businesses, and non-profits to address impacts of the pandemic, which have been most severe among low-income populations. This includes assistance with food, housing, and other needs; employment programs for people with barriers to employment who faced negative economic impacts from the pandemic (such as residents of low-income neighborhoods, minorities, disconnected youth, the unemployed, formerly incarcerated people, veterans, and people with disabilities); and other strategies that provide disadvantaged groups with access to education, jobs, and opportunity.

The County’s overall equity strategy for ARPA-SLFRF, which echoes the goals initially articulated in the County BOS resolution on racial and ethnic health inequities and income inequality, are reflected by both the EELS and JobPath programs:

- **JobPath,** as stated previously, has identified specific programmatic gaps related to equity in participation. The program has also identified advocacy for equity as a strategic goal for the future. ARPA-SLFRF will enable the program to work towards equity in program participation on the micro level while advocating for the removal of workforce barriers that impede equity and justice on the macro level.
- **EELS** is explicitly designed to protect the rights of vulnerable members of the Pima County community – those at risk for eviction. Implicitly, EELS provides people with legal representation, conferencing, and resources that will in many cases prevent evictions that would have otherwise occurred. Explicitly, disaggregated measurement across the program, from referrals to representation and resources provided through court outcomes, will enable managers to

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12 Ibid.
conduct oversight and modify programming as warranted in order to ensure equitable realization of benefits associated with the services offered.

b. Services to Disproportionately Impacted Communities (EC 3): services to address health disparities and the social determinants of health, build stronger neighborhoods and communities (e.g., affordable housing), address educational disparities (e.g., evidence-based tutoring, community schools, and academic, social-emotional, and mental health supports for high poverty schools), and promote healthy childhood environments (e.g., home visiting, child care).

N/A

Describe your jurisdiction’s efforts to date and intended outcomes to promote equity using qualitative and quantitative data on how the jurisdiction’s approach achieved or promoted equitable outcomes or progressed against equity goals. Describe any constraints or challenges that impacted project success in terms of increasing equity.

N/A for Annual Report Period 1

Describe the geographic and demographic distribution of funding, including whether it is targeted toward traditionally marginalized communities.

Several projects are explicitly intended to provide assistance to households and disproportionately impacted populations and communities that address housing insecurity, lack of affordable housing, or homelessness, including:

- Emergency Eviction Legal Services Program; and
- Expansion of JobPath program, which will provide job training for displaced workers, unemployed and low income individuals.

Additionally, a portion of the public health allocation will be directed towards Health Department supplies and services to mitigate and contain COVID-19, including costs incurred for mitigation and case investigation among the asylum seeker population.

See Section C(3) on pages 24 and 25 of the Reporting Guidance for additional information.

Community Engagement

Describe how your jurisdiction’s planned or current use of funds incorporates written, oral, and other forms of input that capture diverse feedback from constituents, community-based organizations, and the communities themselves. Where relevant, this description must include how funds will build the capacity of community organizations to serve people with significant barriers to services, including people of color, people with low incomes, limited English proficiency populations, and other traditionally underserved groups.

See Section C(4) on page 25 of the Reporting Guidance for additional information.

Pima County values the input of its constituents and is committed to maintaining transparency and openness in government. The County collects community input in a variety of ways. As programs in the health and social services are developed, needs assessments and community meetings are often conducted independently or with community partners, like the University of
Arizona. Programs and services are designed to target areas that are disproportionately impacted by health and economic disparities.

Additionally, community members have a variety of ways to provide input via public forums. The County has invested in technological upgrades during pandemic to assure that the community still had ready access to public meetings, including the ability to call-in for comments during meetings and hearings of the legislative body and its related boards, commissions and committees.

The Board of Supervisors determine the overall policy direction of County Government. To assist the public in getting a full understanding of the items before the Board, the Board agendas are posted online. Full background information on each item is available with the click of a button. Constituents may submit emails to the Clerk of the Board to be entered into the public record in lieu of speaking.

There are several ways that constituents can have access to Board action in its entirety. Those who are interested in watching the live proceedings of Board of Supervisors meetings may tune in to local cable channels (Cox channel 96, and Comcast channel 96). For those watching online, the live link is available under “Meetings & Resource” on the Board of Supervisors website. Those who cannot tune in to live broadcasts still have access to current video and audio recordings of recent Board meetings for a 90-day period. After that 90-day period, video and audio recordings will then be archived.

Similarly, all communications from the County Administrator to the Board of Supervisors are posted to the public facing website for those seeking detailed information. Contact information for all County staff and elected officials is readily available.

A new website devoted to the COVID-19 response (PimaRecovers.gov) is currently in development and will be publicly available by November 1, 2021 and under continuous development as more funding and activities are established. This website will include reporting out of monies spent to date with details of projects and allow for public comment on future opportunities.

This public-facing website will showcase relevant ARPA-SLFRF fiscal reporting, performance and evaluative data that will clearly describe ARPA program investment and associated community impact. Data reported will specifically highlight COVID-19 recovery impacts in priority populations, disproportionately affected communities, and relevant geographic area within Pima County. This forum will ensure transparency and accountability in government spending and efficient use of resources associated with federal funding. Information will be provided in a reliable, and timely manner to encourage public examination of the County’s use of all taxpayer’s dollars – specifically federal and state funds provided in response to the COVID-19 pandemic.

**Labor Practices**

*Describe workforce practices on any infrastructure projects being pursued (EC 5). How are projects using strong labor standards to promote effective and efficient delivery of high-quality infrastructure projects while also supporting the economic recovery through strong employment opportunities for workers? For example, report whether any of the following practices are being*
utilized: project labor agreements, community benefits agreements, prevailing wage requirements, and local hiring.

See Section C(5) on page 25 of the Reporting Guidance for additional information.

Pima County follows federal and state procurement guidelines for any infrastructure projects utilizing tax payer dollars. If any federal money is utilized for infrastructure projects, Pima County follows Davis-Bacon for prevailing wages, unless the federal funding source exempts the utilization of prevailing wages. Additionally, Pima County prioritizes small and local businesses in procurement for infrastructure projects. It ensures Small Business Enterprise (SBE) compliance in locally-funded design and construction projects and in the procurement of goods and services as well as Disadvantaged Business Enterprise (DBE) compliance in federally-funded design and construction projects. It provides SBEs with assistance in conducting business with Pima County; maintains a list of certified SBE businesses. The County also assists SBE vendors in certification efforts with the City of Tucson. Additionally, Pima County adopted a Living Wage Ordinance (Ordinance No. 2002-1) which mandates inclusion of a living wage requirement in Pima County contracts for specific services through assistance, review, and monitoring of eligible contracts. The 2021 Living Wage is $13.33 per hour for employees who do not receive benefits; and $12.15 per hour with $1.18 in benefits for those employees who do receive benefits. Arizona has banned the use of project labor agreements, so Pima County does not participate in that process. While the County does not regularly utilize community benefits agreements, extensive community input is often gathered on capital projects throughout the design phase to ensure community needs are met. Additionally, when developers are selected for development of County lands they are required to provide community impact analyses.

Use of Evidence

Identify whether SLFRF funds are being used for evidence-based interventions and/or if projects are being evaluated through rigorous program evaluations that are designed to build evidence. Specifically, in this section, recipients should describe their overall approach for using evidence and evaluation, including how a Learning Agenda (either narrowly focused on SLFRF or broadly focused on the recipient’s broader policy agenda) could support their overarching evaluation efforts in order to create an evidence-building strategy for their jurisdiction. However, detailed evidence information for each project should be included in the Project Inventory (see details in the Project Inventory section below).

See Section C(6) on page 26 of the Reporting Guidance for additional information.

The Foundations for Evidence-Based Policymaking Act emphasizes the need for federal agencies to formally plan and invest in infrastructure to support evidence-building activities as part of agency-wide (and coordinated government-wide) strategic planning, spanning a variety of distinct uses of data with focus on utilization of learnings. Evaluation is a key functional activity underlying evidence-building and is inextricably bound to any substantive improvement in intentional data use. Strategically rooted research and evaluation efforts should “address an

appropriate balance between needs related to organizational learning, ongoing program management, performance management, strategic management, interagency and private sector coordination, internal and external oversight, and accountability.”

For localities like the County, ARPA-SLFRF funding presents a much-needed impetus approach planning as an opportunity to reconcile multi-level priorities and articulate an intentional organizational learning strategy in the form of a Learning Agenda designed to both achieve goals associated with pandemic mitigation and recovery as well as to realize the broader benefits of ARPA-SLFRF-funded capacity enhancements. This Learning Agenda will center on building an evidence base that enables the County to promote effective, efficient, and equitable stewardship of funding, regardless of source, on behalf of people living in Pima County.

One way the County will solidify its commitment to program evaluation is by building out its Grants Management and Innovation (GMI) Research and Analysis (RA) unit, a division devoted to evaluation planning, practice, and use associated with ARPA-SLFRF projects. The unit will house a mixture of data analysts and evaluators. Affiliation with County Administration, rather than with a particular department, is intended to promote impartiality as well as to promote a direct channel of communication to disseminate data reports and evaluation findings to organizational leadership for use in decision-making. Ultimately, investing in internal evaluation capacity will also reduce the County’s dependence on external evaluation consultants.

A principal goal of GMI capacity expansion will be to ensure that evaluation reporting informs decision-making by departmental and County leadership through intentional planning and guided use. While priorities of decision-makers at different levels of the organization often differ, well-designed and well-executed evaluations can allow GMI RA to work with sponsoring department staff to ensure that evaluations are useful and relevant to decision-makers. GMI RA will also assist with synthesizing evaluation reports and other information, contextualizing relevant successes, failures, and lessons learned to ensure that findings that may resound beyond the sponsoring department to reach partners and public audiences alike as appropriate.

Engagement in formative work on the organization’s Learning Agenda for ARPA-SLFRF will allow County evaluation practitioners to work in the longer term towards operationalizing the concept of evaluative thinking within departmental contexts. Promotion of evaluative thinking within the County organization can be supported in a number of ways:

1) Create an intentional learning environment;
2) Establish a habit of scheduling meeting time focused on evaluative thinking practice;
3) Use role-play when planning evaluation work;
4) Diagram or illustrate thinking with colleagues;
5) Engage in supportive, critical peer review; and
6) Engage in evaluation.

County evaluators and peers will employ these strategies to support a cohesive approach to evaluative thinking within and across departments in order to establish buy-in and sustain enthusiasm, ideally progressing to development and adoption of policies to support high quality evaluation practice and infuse evaluative thinking across the organization.

14 Results for America (2019). Evidence Act Brief. Available at: https://results4america.org/evidence-act-resources/
Table of Expenses by Expenditure Category

In this section, list the amount of funds used in each Expenditure Category. The table should include cumulative expenses to date within each category, and the additional amount spent within each category since the last annual Recovery Plan.

Jurisdictions may modify the table as needed by deleting unused rows where they have not expended any funds or by adding columns to more clearly characterize their program expenditures over time.

For the initial Recovery Plan, the amounts listed for “Cumulative expenditures to date” and “Amount spent since last Recovery Plan” will be equal.

<table>
<thead>
<tr>
<th>Category</th>
<th>Cumulative expenditures to date ($)</th>
<th>Amount spent since last Recovery Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1</td>
<td>COVID-19 Vaccination</td>
<td>$3,117,943.44</td>
</tr>
<tr>
<td>1.6</td>
<td>Medical Expenses (including Alternative Care Facilities)</td>
<td>$1,743,384.52</td>
</tr>
<tr>
<td>1.8</td>
<td>Other COVID-19 Public Health Expenses (including Communications, Enforcement, Isolation/Quarantine)</td>
<td>$365,067.53</td>
</tr>
<tr>
<td>1.9</td>
<td>Payroll Costs for Public Health, Safety, and Other Public Sector Staff Responding to COVID-19</td>
<td>$3,315,409.80</td>
</tr>
<tr>
<td>1.12</td>
<td>Other Public Health Services</td>
<td>$331,956.97</td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.5</td>
<td>Household Assistance: Eviction Prevention</td>
<td>$55,428.01</td>
</tr>
<tr>
<td>2.7</td>
<td>Job Training Assistance (e.g., Sectoral job-training, Subsidized Employment, Employment Supports or Incentives)</td>
<td>$0.00</td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.1</td>
<td>Provision of Government Services</td>
<td>$0.00</td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.1</td>
<td>Administrative Expenses</td>
<td>$4,764.34</td>
</tr>
<tr>
<td>7.2</td>
<td>Evaluation and data analysis</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

See Section C(7) on page 27 of the Reporting Guidance for additional information.

Project Inventory

In this section, jurisdictions should provide a description of each project undertaken. See Section C(8) on page 27 of the Reporting Guidance for additional information. Below is an example of how to present the information noted in the Reporting Guidance, which incorporates project details as well as evidence and performance measure information outlined in the relevant sections above. This information should be replicated for all of the jurisdiction’s projects.
Example Project
Project [Identification Number]: [Project Name]
Funding amount: [Funding amount]
Project Expenditure Category: [Category number, Category Name]

Project overview
- A description of the project that includes an overview of the main activities of the project, the approximate timeline, primary delivery mechanisms and partners, if applicable, and intended outcomes.
- Link to the website of the project if available
- How project contributes to addressing climate change (for EC 5 infrastructure projects)

Use of Evidence
- Briefly describe the goals of the project, and whether SLFRF funds are being used for evidence-based interventions, the evidence base for the interventions, and/or if projects are being evaluated through rigorous program evaluations that are designed to build evidence. If a recipient is conducting a program evaluation in lieu of reporting the amount of spending on evidence-based interventions, they must describe the evaluation design (see Reporting Guidance for additional details that should be included).
- Identify the dollar amount of the total project spending that is allocated towards evidence-based interventions for each project in the Public Health (EC 1), Negative Economic Impacts (EC 2), and Services to Disproportionately Impacted Communities (EC 3) Expenditure Categories.

See Section C(6) on page 26 of the Reporting Guidance for additional information.

Additional Projects
Project [Identification Number]: [Project Name]
Funding amount: [Funding amount]
Project Expenditure Category: [Category number, Category Name]

NOTE: Non-mandatory key performance indicators for each County project listed below will be reported as projects are implemented.
Project PC-01: Health Department Personnel  
Funding amount: $19,041,825.00  
Project Expenditure Category: EC 1.9 Payroll Costs for Public Health, Safety, and Other Public Sector Staff Responding to COVID-19:

Project Overview:  
Payroll and covered benefit expenses for public health employees mitigating or responding to the COVID–19 public health emergency.

<table>
<thead>
<tr>
<th>Annual Report Period 1 Expenditures</th>
<th>Total Allocated</th>
</tr>
</thead>
<tbody>
<tr>
<td>$3,315,409.80</td>
<td>$19,041,825.00</td>
</tr>
</tbody>
</table>

Use of Evidence: Not required for EC selected  
Mandatory Performance Indicators: None  
Key Performance Indicators:  
- Number of government (County) FTEs responding to COVID-19 supported under this authority  
- Number of COVID tests administered by County  
- Number of COVID vaccine doses administered by County  
- Percent of County population vaccinated (cumulative, as of reporting period end)

Project PC-02: Health Department: Supplies and Services  
Funding amount: $43,289,625.00  
Project Expenditure Category: EC 1.1: COVID-19 Vaccination; EC 1.6: Medical Expenses (including Alternative Care Facilities); EC 1.12: Other Public Health Services

Project Overview:  
Despite millions in public grant funds received and expended by Pima County in Annual Report Period 1 to respond to the public health emergency, the Health Department incurred unfunded costs that could not be defrayed by other grants based on performance period and/or cost eligibility restrictions. This funding will be used to defray supplies and services costs incurred by the Health Department to address the public health emergency.

<table>
<thead>
<tr>
<th>Annual Report Period 1 Expenditures</th>
<th>Total Allocated</th>
</tr>
</thead>
<tbody>
<tr>
<td>$5,193,284.93</td>
<td>$43,289,625.00</td>
</tr>
</tbody>
</table>

Targeted to Economically Disadvantaged Communities? No  
Use of Evidence: Not required for EC selected  
Mandatory Performance Indicators: None  
Key Performance Indicators:  
- Number of COVID tests administered by County  
- Number of COVID vaccine doses administered by County  
- Percent of County population vaccinated (cumulative, as of reporting period end)
Project PC-03: COVID-19 and Community Recovery Communications  
**Funding Amount:** $1,800,000.00  
**Project Expenditure Category:** EC 1.8: Other COVID-19 Public Health Expenses

**Project Overview:**  
Communication activities to address the public health emergency (e.g. vaccination hesitancy; boosters; pediatric vaccinations).

<table>
<thead>
<tr>
<th>Annual Report Period 1 Expenditures</th>
<th>Total Allocated</th>
</tr>
</thead>
<tbody>
<tr>
<td>$365,067.53</td>
<td>$1,800,000.00</td>
</tr>
</tbody>
</table>

**Use of Evidence:** Not required for EC selected

**Mandatory Performance Indicators:** None  
**Key Performance Indicators:**  
- Number of public service announcements or other messaging materials generated

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Project PC-04: Emergency Eviction Legal Defense Services (EELS) – Direct Service  
**Funding Amount:** $2,000,000.00  
**Project Expenditure Category:** EC 2.5: Household Assistance: Eviction Prevention

**Project Overview:**  
Due to the precipitous declines in economic activity and employment, as well as direct impacts of COVID-19 illness, exposure, quarantine and caregiving, tens of thousands of households in Pima County are at risk of eviction, particularly with the looming expiration of the moratorium on evictions. In many cases, access to counsel can increase the likelihood of a settlement with the landlord and eviction prevention, particularly in combination with Pima County's Housing and Utility Assistance programs.

Pima County’s new Office of Emergency Eviction Legal Defense Services (created at the Board’s Direction) will provide legal services through competitive procurement of private lawyers or lawyers with one or more nonprofits to provide limited-scope or full representation to tenants, as appropriate. Funds may also be used to train lawyers who don’t have experience in eviction cases. The Office will also provide navigation services and Eviction Prevention Clinics to provide information about eviction process to litigants and connect parties with additional resources.

<table>
<thead>
<tr>
<th>Annual Report Period 1 Expenditures</th>
<th>Total Allocated</th>
</tr>
</thead>
<tbody>
<tr>
<td>$55,428.01</td>
<td>$2,000,000.00</td>
</tr>
</tbody>
</table>

**Targeted to Economically Disadvantaged Communities?** Yes

**Use of Evidence:** In lieu of reporting the amount of spending on evidence-based interventions, the County will undertake an evaluation of EELS over the funding period. The evaluation will feature an undetermined quasi-experimental design, as this is a new
division and is not appropriate for a randomized approach. Key research questions will be
developed in conjunction with EELS managers and County leadership, and will align with
the County’s ARPA-SLRF Learning Agenda. Study outcomes will be disaggregate by
demographics unless specific outcomes do not yield sufficient statistical power.

Mandatory Performance Indicators:
- Number of people or households receiving eviction prevention services (including legal representation) 0
- Number of affordable housing units preserved or developed 0
- Number of workers enrolled in sectoral job training programs 0
- Number of workers completing sectoral job training programs 0
- Number of people participating in summer youth employment programs 0

Key Performance Indicators:
- Number of landlord-tenant settlement conferences convened
- Number of qualifying tenants referred to counsel

Project PC-05: JobPath
Funding Amount: $3,002,500
Project Expenditure Category: EC 2.7: Job Training Assistance

Project Overview:
Education, job training and job placement are critical for the recovery of our community. Many adults work multiple minimum wage jobs and yet are still unable to support their families, while local employers struggle to find skilled employees to meet their workforce needs. COVID-19 has had detrimental effects on the local economy, with layoffs and modified working conditions. Changes to the labor market, such as fewer hospitality and retail jobs in addition to ongoing automation of office and factory jobs, mean many workers won’t have jobs to return to and will need to reskill in order to reenter the workforce.

Since its inception in 1998, the JobPath program has been a primary support mechanism to assist students and lower income workers in Pima County in their quest to advance their training with a goal to obtain diplomas and/or technical certifications leading to higher income jobs. The JobPath model includes providing household assistance to assure that students do not face economic barriers to completing their chosen training program, including wrap-around case management services and financial aid for both school and non-school expenses (e.g., childcare, car repairs, and minor emergencies).

<table>
<thead>
<tr>
<th>Annual Report Period 1 Expenditures</th>
<th>Total Allocated</th>
</tr>
</thead>
<tbody>
<tr>
<td>$0.00</td>
<td>$3,003,500.00</td>
</tr>
</tbody>
</table>

Targeted to Economically Disadvantaged Communities? Yes
Use of Evidence: In lieu of reporting the amount of spending on evidence-based interventions, the County will undertake an evaluation of JobPath over the funding period. The evaluation will feature an undetermined quasi-experimental design. Key research questions will be developed in conjunction with JobPath and County leadership, and will align with the County’s ARPA-SLFRF Learning Agenda. Study outcomes will be disaggregate by demographics unless specific outcomes do not yield sufficient statistical power.

**Mandatory Performance Indicators:**
- Number of workers enrolled in sectoral job training programs: 0
- Number of workers completing sectoral job training programs: 0
- Number of people participating in summer youth employment programs: 0

**Key Performance Indicators:**
- Percent of JobPath participants obtaining certification (Target: 40-45%)
- Percent of JobPath participants obtaining employment with wage of $16/hour or more (Target: 80%)
- Percent of JobPath participants enrolling in and completing second year after completing first year of a college degree program (Target: 80%)

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Project PC-06: Revenue Replacement

**Funding Amount:** $3,066,128

**Project Expenditure Category:** EC 6.1: Provision of Government Services

**Project overview:** For the provision of government services to the extent of a reduction in the recipient’s general revenue, calculated according to the methodology provided in the Interim Final Rule.

<table>
<thead>
<tr>
<th>Annual Report Period 1 Expenditures</th>
<th>Total Allocated</th>
</tr>
</thead>
<tbody>
<tr>
<td>$0.00</td>
<td>$3,066,128</td>
</tr>
</tbody>
</table>

Use of Evidence: Not required for EC selected

**Mandatory Performance Indicators:** None

**Key Performance Indicators:**
- Amount of revenue replaced
Project PC-07: Pima County Grants Management & Innovation (GMI) ARPA-SLFRF Team
Funding Amount: $3,483,500
Project Expenditure Category: EC 7.1: Administrative Expenses or EC 7.2: Evaluation and Data Analysis

Project overview:
With the dramatic increase in federal funding over the last year and the continued expansion both through the American Rescue Plan Act and anticipated infrastructure funding, it is necessary for the County to expand vital segments of GMI to allow for the continued building out of financial oversight and management as well as research, analysis and evaluation capacity, in order to augment the depth of experience needed to support ARPA-SLFRF grant-funded initiatives.

GMI Finance will provide technical oversight and financial management to align with all expenditures under the ARPA-SLFRF funding allocated to the County. This team will provide accounting, financial management and compliance oversight for these critical funds.

GMI Research & Analysis (GMI RA) provides technical assistance to County departments in data analysis, program evaluation, and business process flows and reorganization. Building out two core teams – Data and Evaluation and Research, Policy and Strategic Planning – will equip the County and its departments with the necessary capacity to fulfill requirements for performance measurement and reporting associated with ARPA-SLFRF-funded projects.

<table>
<thead>
<tr>
<th>Annual Report Period 1 Expenditures</th>
<th>Total Allocated</th>
</tr>
</thead>
<tbody>
<tr>
<td>$4,764.34</td>
<td>$3,483,500</td>
</tr>
</tbody>
</table>

Use of Evidence: Not required for EC selected

Mandatory Performance Indicators: None

Key Performance Indicators:
- Number of government FTEs supported with this funding 1

Performance Report

- For the Project Inventories in Section 8, include key performance indicators for your jurisdiction’s major ARPA-SLFRF funded projects. Report key performance indicators for each project, or group projects with substantially similar goals and the same outcome measures. Jurisdictions may choose to include some indicators for each individual project as well as crosscutting indicators. Include both output and outcome measures. See Section C(9) on page 27 of the Reporting Guidance for additional information.
- In addition, you must include the mandatory performance indicators if your jurisdiction has projects in the relevant areas (this information may be included in each recipient’s Recovery Plan as they determine most appropriate). Provide data disaggregated by race, ethnicity, gender, income, and other relevant factors, if possible. Data should be presented in a table and each annual report should include updated data for the performance period as well as prior period data.
a. Household Assistance (EC 2.2 & 2.5) and Housing Support (EC 3.10-3.12):
   - Number of people or households receiving eviction prevention services (including legal representation)
   - Number of affordable housing units preserved or developed
b. Negative Economic Impacts (EC 2):
   - Number of workers enrolled in sectoral job training programs
   - Number of workers completing sectoral job training programs
   - Number of people participating in summer youth employment programs
c. Education Assistance (EC 3.1-3.5):
   - Number of students participating in evidence-based tutoring programs
d. Healthy Childhood Environments (EC 3.6-3.9):
   - Number of children served by childcare and early learning (pre-school/pre-K/ages 3-5)
   - Number of families served by home visiting

See Section C(10) on page 27 of the Reporting Guidance for additional information.

<table>
<thead>
<tr>
<th>Expenditure Category</th>
<th>Mandatory Performance Indicator</th>
<th>Annual Report Period 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Household Assistance (EC 2.2 &amp; 2.5) and Housing Support (EC 3.10-3.12)</td>
<td>Number of people or households receiving eviction prevention services (including legal representation)</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Number of affordable housing units preserved or developed</td>
<td>0</td>
</tr>
<tr>
<td>Negative Economic Impacts (EC 2)</td>
<td>Number of workers enrolled in sectoral job training programs</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Number of workers completing sectoral job training programs</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Number of people participating in summer youth employment programs</td>
<td>0</td>
</tr>
<tr>
<td>Education Assistance (EC 3.1-3.5)</td>
<td>Number of students participating in evidence-based tutoring programs</td>
<td>N/A</td>
</tr>
<tr>
<td>Healthy Childhood Environments (EC 3.6-3.9)</td>
<td>Number of children served by childcare and early learning (pre-school/pre-K/ages 3-5)</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Number of families served by home visiting</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Ineligible Activities: Tax Offset Provision (States and territories only)

For the initial reporting year, States and territories will report the following items related to the Tax Offset Provision 31 CFR 35.8. Baseline revenue or revenue-increasing covered charges are not required at this time.

<table>
<thead>
<tr>
<th>Item</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Revenue-reducing Covered Changes</td>
<td>$</td>
</tr>
</tbody>
</table>

See Section C(11) on page 28 of the Reporting Guidance for additional information. Additional guidance will be forthcoming for reporting requirements regarding the tax offset provision.