Royal Oak
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Office of the City Manager
203 South Troy Street
Royal Oak, MI 48067
www.romi.gov

Guidehouse American Rescue Plan Act (ARPA) Update

February 8, 2022

The Honorable Mayor Fournier and
Members of the City Commission:

On March 11, 2021, the American Rescue Plan Act (ARPA) was signed into law by President Joseph Biden. Under ARPA, Royal Oak will receive a direct allocation of $28,107,502.00. There are four broad eligible uses for these monies identified in the statute:

1. To respond to the COVID-19 public health emergency and its negative impacts;
2. To provide premium pay for essential workers;
3. To provide government services to the extent of eligible governments' revenue losses; and
4. To make necessary water, sewer, and broadband infrastructure investments.

Given the large amount of federal funds the city is receiving, as well as the monitoring and compliance requirements established by ARPA, the city entered into an agreement with Guidehouse Inc. on June 28, 2021, to assist Royal Oak with the administration of ARPA funds.

Throughout the remainder of 2021, Guidehouse initiated the first phase of its engagement with Royal Oak. It scheduled and conducted individual interviews with city commissioners and city staff in order to determine key highlights, themes, and potential projects that would align with trending priorities. The results of this work to date is the focus of Guidehouse's update to the city commission on February 14, 2022 (Attachment 1).

On the federal side, the roll-out of ARPA has not been smooth. There has been a lack of clear guidance from the Department of Treasury, and its Final Rule governing ARPA and eligible activities was not even released until last month. This delay has resulted in a bottleneck of unspent ARPA funds across the country, especially at the state and county levels. Ultimately, it is city staff's goal to coordinate with the state and county where feasible to avoid duplication of efforts and to maximize the impact of the city's ARPA allocation.

There is no action for the city commission to take with regard to this agenda item.

Respectfully submitted,
Todd E. Fenton
Deputy City Manager

Approved,

Paul J. Brake, ICMA-CM, CEcD
City Manager

1 Attachment

Guidehouse

City of Royal Oak American Rescue Plan Act (ARPA) Update

Commission Meeting

February 14, 2022

Agenda

1. Guidehouse Introduction
2. ARPA Overview
3. ARPA Challenges
4. Trending Top Priorities
5. Proposed Projects
6. Community Feedback
7. Next Steps

Guidehouse Team

JAMIE HAMILTON
Director

ELENA SCHWARTZENBERG
Project Manager

Project Plan

Project Phases

Phase 1: Kickoff

Deliverables: Commission presentation, kickoff meeting, introductory materials

Phase 2: Information Gathering

Deliverables: Survey stakeholders, interview results, project prioritization and scopes

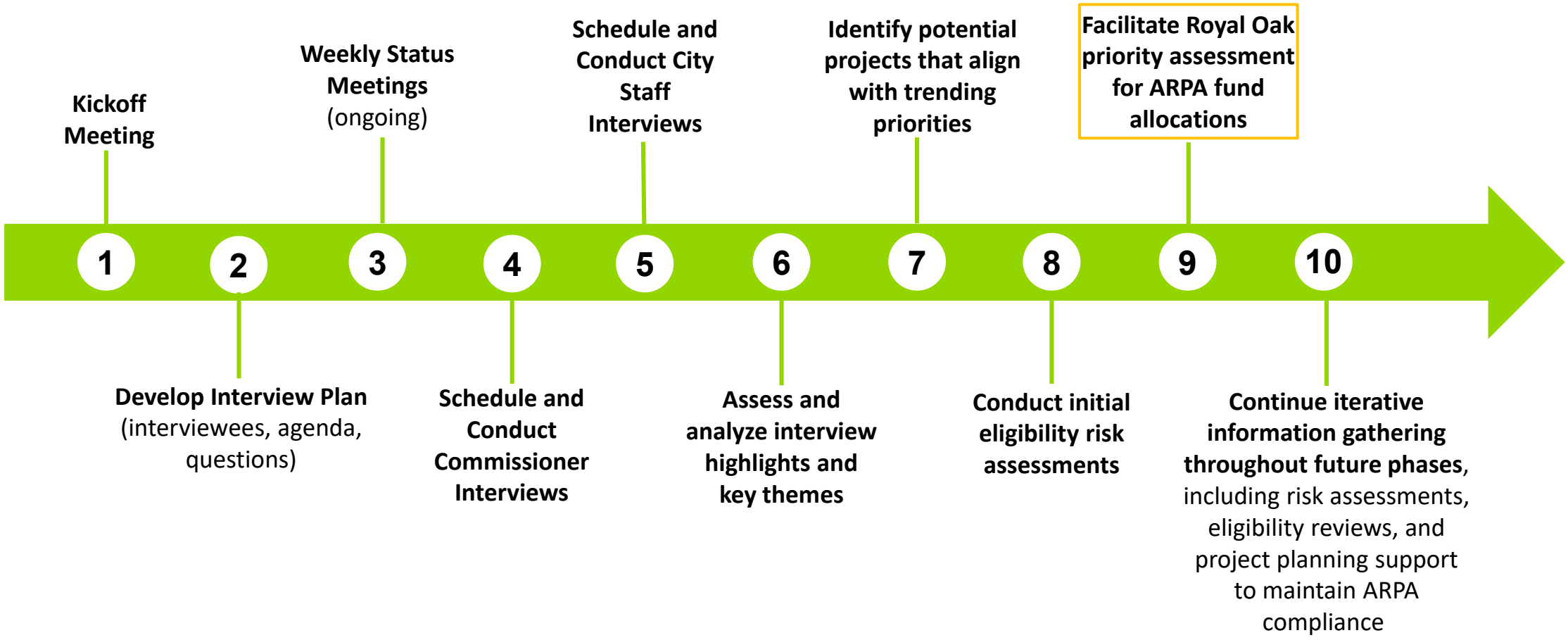
Phase 3: Risk Assessment and Eligibility Review

Deliverables: Risks assessments, eligibility memos, reporting requirement review

Phase 4: Reporting and Documentation Requirements

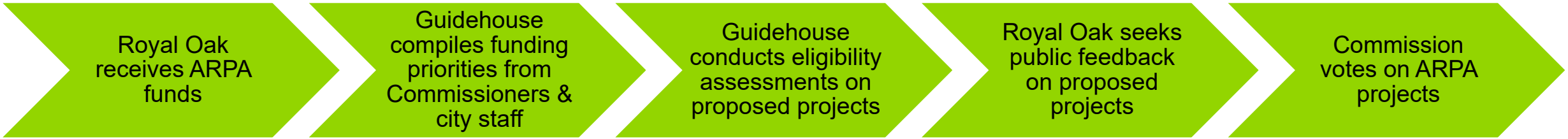
Deliverables: Treasury Interim and Quarterly Reports, Recovery Plan Performance Reports, and any additional monitoring and compliance

Phases 1, 2, and 3: Kickoff, Information Gathering, and Risk Assessment and Eligibility Review



ARPA Decision-Making Process Flow

Royal Oak's ARPA Project Decision-Making Process Flow



ARPA Overview

ARPA Policy Overview

Eligibility Framework

Funding directly addresses a negative impact of the COVID-19 public health emergency

1) **Negative Impact:** Identify the harmful effect of COVID-19 that the activity or expense will address.
   - *Nature of harm:* Assess the causal or compounding connection to COVID-19.
   - *Nature of harm:* Assess the disproportionate impact on distressed sectors or populations.
2) **Respond to Impact:** Determine how to demonstrate the activity or expense produces the expected outcome(s) to address and respond to the harm caused by COVID-19.

Timeframe

- Costs **incurred on or after** March 3, 2021, unless otherwise stated in the guidance
- **Must be obligated** by December 31, 2024
- **Expended** by December 31, 2026

Eligible Uses

1

Support the Public Health Response

Meet and address emergent public health needs

2

Respond to the Negative Economic Impacts

Address economic harm resulting from or exacerbated by the public health emergency

3

Premium Pay for Essential Workers

Provide premium pay to eligible workers performing essential work during the COVID-19 public health emergency, either in public sector roles or through grants to third-party employers

4

Revenue Loss

Provide government services to the extent of reduction in revenue experienced due to COVID-19

5

Investments in Infrastructure

Meet the critical need for investments and improvements to existing infrastructure in water, sewer, and broadband

Expenditure Categories

All ARPA projects must fall within one of the categories below:

Public Health

1.1 COVID-19 Vaccination
1.2 COVID-19 Testing
1.3 COVID-19 Contact Tracing
1.4 Prevention in Congregate Settings
1.5 Personal Protective Equipment
1.6 Medical Expenses
1.7 Capital Investments or Physical Plant Changes to Public Facilities that respond to the COVID-19 public health emergency
1.8 Other COVID-19 Public Health Expenses
1.9 Payroll Costs for Public Health, Safety, and Other Public Sector Staff Responding to COVID-19
1.10 Mental Health Services
1.11 Substance Use Services
1.12 Other Public Health Services

Negative Economic Impacts

2.1 Household Assistance: Food Programs
2.2 Household Assistance: Rent, Mortgage, & Utility Aid
2.3 Household Assistance: Cash Transfers
2.4 Household Assistance: Internet Access Programs
2.5 Household Assistance: Eviction Prevention
2.6 Unemployment Benefits or Cash Assistance to Unemployed Workers
2.7 Job Training Assistance
2.8 Contributions to UI Trust Funds
2.9 Small Business Economic Assistance (General)
2.10 Aid to Nonprofit Organizations
2.11 Aid to Tourism, Travel, or Hospitality
2.12 Aid to Other Impacted Industries
2.13 Other Economic Support
2.14 Rehiring Public Sector Staff

Services to Disproportionately Impacted Communities

3.1 Education Assistance: Early Learning
3.2 Education Assistance: Aid to High-Poverty Districts
3.3 Education Assistance: Academic Services
3.4 Education Assistance: Social, Emotional, and Mental Health Services
3.5 Education Assistance: Other
3.6 Healthy Childhood Environments: Child Care
3.7 Healthy Childhood Environments: Home Visiting
3.8 Healthy Childhood Environments: Services to Foster Youth or Families Involved in Child Welfare System
3.9 Healthy Childhood Environments: Other
3.10 Housing Support: Affordable Housing
3.11 Housing Support: Services for Unhoused Persons
3.12 Housing Support: Other Housing Assistance
3.13 Social Determinants of Health: Other
3.14 Social Determinants of Health: Community Health Workers or Benefits Navigators
3.15 Social Determinants of Health: Lead Remediation
3.16 Social Determinants of Health: Community Violence Interventions

Premium Pay

4.1 Public Sector Employees
4.2 Private Sector: Grants to Other Employees

Infrastructure

5.1 Clean Water: Centralized Wastewater Treatment
5.2 Clean Water: Centralized Wastewater Collection and Conveyance
5.3 Clean Water: Decentralized Wastewater
5.4 Clean Water: Combined Sewer Outflows
5.5 Clean Water: Other Sewer Infrastructure
5.6 Clean Water: Stormwater
5.7 Clean Water: Energy Conservation
5.8 Clean Water: Water Conservation
5.9 Clean Water: Nonpoint Source
5.10 Drinking Water: Treatment
5.11 Drinking Water: Transmission & Distribution
5.12 Drinking Water: Transmission & Distribution: Lead Remediation
5.13 Drinking Water: Source
5.14 Drinking Water: Storage
5.15 Drinking Water: Other Water Infrastructure
5.16 Broadband: “Last Mile” Projects
5.17 Broadband: Other Projects

Revenue Replacement

6.1 Provision of Government Services

Administrative & Other

7.1 Administrative Expenses
7.2 Evaluation & Data Analysis
7.3 Transfers to Other Units of Government

ARPA Challenges

ARPA Challenges

- Lack of clear guidance from Treasury
  - The Final Rule was recently released in mid-January 2022
- Collaboration at the State and County levels
- Overlapping and pending funding programs, including:
  - Infrastructure Investment and Jobs Act
  - Build Back Better framework
  - Capital Projects Fund
  - Numerous housing assistance programs

- *97.1% of state and local ARPA funds were unspent as of the first reporting period*
  - *Data from the initial ARPA report shows that state and local governments have only spent **2.9%** of their allocated ARPA funds (as of July 31, 2021)*
  - *State and local governments were allocated $172 billion of ARPA funds but had only spent $4.9 billion*

Trends from Commissioner and City Staff Interviews

Trending Priorities from Commissioner Interviews

1. Infrastructure
   a. Lead pipe replacement
   b. Flooding prevention
   c. Water main improvements
2. Support for essential workers and those hit hardest by the pandemic
3. Mental health support
4. Affordable housing
5. Revenue loss: reimbursement for city impacts resulting from COVID-19

Department Head Interviews

Relevant Department Heads were consulted for program feedback

Department
City Manager's Office
Engineering
Finance
Fire
Human Resources
Planning and Community Development
Police
Public Library
Public Services and Recreation

Trending Project Proposals

Based on feedback from Commissioners and City Staff

1. Infrastructure
   a. Lead pipe replacement
   b. Flooding prevention
   c. Water main improvements
2. Premium pay for essential workers
3. Social workers for mental health support
4. Affordable housing
5. Funding to support community programming facilitated by non-profit organizations
6. HEPA filters for public buildings
7. Library broadband programs
8. Public restrooms
9. Generator for Farmer's Market
10. Community tree planting
11. Revenue loss: reimbursement for city impacts resulting from COVID-19

Proposed ARPA Projects

ARPA Proposals Eligibility Assessment

ARPA eligibility risk levels for potential programs are illustrated using the color coding below:

Risk Levels

	High Risk	Eligibility concerns based on available information. Requires more information.
	Medium Risk	Medium risk based on available information. Requires more information.
	Low Risk	No eligibility concerns based on available information.

ARPA Proposal Eligibility Assessment

Public Health Response

Program	Est. Cost	Implementation Timeframe (Short/Medium/ Long Term)	Impact to Royal Oak
Public Restrooms: Centennial Commons Park and Farmer's Market	TBD	Short Term	Enables residents to leisurely enjoy Royal Oak's new Centennial Commons park without having to leave the park to search for nearby public restrooms. Also helps mitigate the spread of disease in public spaces by providing hand-washing stations to the Royal Oak community.
Recommendation: Coordinate with Oakland County to maximize support and ensure no duplication of benefits			

ARPA Proposal Eligibility Assessment

Public Health Response

Program	Est. Cost	Implementation Timeframe (Short/Medium/ Long Term)	Impact to Royal Oak
Social Worker(s) for Mental Health Support	TBD	Medium Term	Support Royal Oak residents and employees amidst a global rise in mental health issues. Possible applications include: • Library (support the general public, including homeless population) • Schools (youth and teenage students) • Police department (support for the public)
HEPA filters for public buildings	TBD	Short/Medium Term	Mitigate the spread of COVID-19 in public buildings, thus protecting government employees and residents.
Recommendation: Coordinate with Oakland County to maximize support and ensure no duplication of benefits			

ARPA Proposal Eligibility Assessment

Provision of Government Services

Program	Est. Cost	Implementation Timeframe (Short/Medium/ Long Term)	Impact to Royal Oak
Animal Shelter	TBD	Long Term	Provide a new and improved animal shelter to help keep up with increased demand. The current animal shelter is overfilled and is funded by a donation model; proposing a larger facility will meet increased demand, as well as make the animal shelter a city funded operation.
Generator for Farmer's Market	TBD	Short Term	Install a permanent generator so the Farmer's Market can operate as an emergency center during power outages.
Recommendation: Coordinate with Oakland County to maximize support and ensure no duplication of benefits			

ARPA Proposal Eligibility Assessment

Provision of Government Services

Program	Est. Cost	Implementation Timeframe (Short/Medium/ Long Term)	Impact to Royal Oak
Community Tree Planting	TBD	Medium Term	Enhance residential green space by planting trees in the front lawn area between residential sidewalks and roads. Provides public benefits including neighborhood and roadway beautification and sustainability benefits such as improved water retention and air quality.
Recommendation: Coordinate with Oakland County to maximize support and ensure no duplication of benefits			

ARPA Proposal Eligibility Assessment

Negative Economic Impacts

Program	Est. Cost	Implementation Timeframe (Short/Medium/ Long Term)	Impact to Royal Oak
Affordable Housing Development	TBD	Long Term	Help address housing access inequities through affordable housing development.
Recommendation: Coordinate with Oakland County to maximize support and ensure no duplication of benefits			

ARPA Proposal Eligibility Assessment

Negative Economic Impacts

Program	Est. Cost	Implementation Timeframe (Short/Medium/ Long Term)	Impact to Royal Oak
Royal Oak Non-Profit Community Programming	TBD	Short Term	Provide funding to support community programming at local non-profit organizations, which benefits residents of all ages and income levels.
Recommendation: Coordinate with Oakland County to maximize support and ensure no duplication of benefits			

ARPA Proposal Eligibility Assessment

Premium Pay for Essential Workers

Program	Est. Cost	Implementation Timeframe (Short/Medium/ Long Term)	Impact to Royal Oak
Premium Pay for essential workers hit hardest by the pandemic	TBD	Medium Term	Provide financial assistance to essential workers who were exposed to heightened risk of contracting COVID-19.
Recommendation: Coordinate with Oakland County to maximize support and ensure no duplication of benefits. Leverage State premium pay program (information forthcoming).			

ARPA Proposal Eligibility Assessment

Infrastructure

Program	Est. Cost	Implementation Timeframe (Short/Medium/ Long Term)	Impact to Royal Oak
Lead pipe replacement	TBD (average cost of $5k-6k per home)	Medium Term	Expedite current lead pipe replacement program by increasing the number of houses that are remediated per year.
Flooding prevention	TBD	Medium/Long Term	Help address Royal Oak's historic issues with flooding by improving stormwater retention, thus minimizing risk and severity of flooding in local roadways and residents' basements.

Recommendation: Coordinate with Oakland County to maximize support and ensure no duplication of benefits. Utilize Infrastructure Investment and Jobs Act.

ARPA Proposal Eligibility Assessment

Infrastructure

Program	Est. Cost	Implementation Timeframe (Short/Medium/ Long Term)	Impact to Royal Oak
Water main improvements	TBD	Medium/Long Term	Upgrade outdated water mains, preventing future water main breaks. Will synergize with road millage projects ending in 2024 and lead line replacement project.
Library Broadband Programs	TBD	Short/Medium Term	Provide higher quality Internet access to Royal Oak residents of all ages and income levels. Requests include: • Improve library broadband speed and reliability • Expand WiFi to new park outside the library (Centennial Commons Park) • Hotspot program: expand or subsidize current program

Recommendation: Coordinate with Oakland County to maximize support and ensure no duplication of benefits.
Utilize Infrastructure Investment and Jobs Act for water main improvements.
Utilize Capital Projects Fund, pending State approval, for Library Broadband Programs.

Community Feedback

Community Feedback

Seek feedback on which proposed ARPA projects are most important to Royal Oak residents

- Develop survey for public feedback on ARPA project proposals

Next Steps

Next Steps

Action Items	Owner
Finalize proposed list of ARPA projects for public feedback	Commission
Design public feedback survey and draft questions	Guidehouse and Siren Strategy
Distribute public survey	City of Royal Oak
Compile and analyze survey results	Guidehouse and Siren Strategy
Report survey results to Commission	Guidehouse
Commissioners vote on ARPA-funded projects	Commission

Questions & Closing

Appendix

ARPA Policy Overview

Eligibility Framework

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2) **Respond to Impact:** Determine how to demonstrate the activity or expense produces the expected outcome(s) to address and respond to the harm caused by COVID-19.

Timeframe

- Costs **incurred on or after** March 3, 2021, unless otherwise stated in the guidance
- **Must be obligated** by December 31, 2024
- **Expended** by December 31, 2026

SLFRF awards are generally subject to the requirements set forth in Uniform Guidance (2 CFR 200). This guidance outlines a recipient's compliance responsibilities as they relate to procurement, internal controls, allowable costs, subrecipient monitoring, and more.

Eligible Uses

Support the Public Health Response

Meet and address emergent public health needs

Respond to the Negative Economic Impacts

Address economic harm resulting from or exacerbated by the public health emergency

Premium Pay for Essential Workers

Provide premium pay to eligible workers performing essential work during the COVID-19 public health emergency, either in public sector roles or through grants to third-party employers

Revenue Loss

Provide government services to the extent of reduction in revenue experienced due to COVID-19

Investments in Infrastructure

Meet the critical need for investments and improvements to existing infrastructure in water, sewer, and broadband

1 Support the Public Health Response

Meet and address emergent public health needs

COVID-19 Mitigation & Containment

- Vaccine programs,
- Testing & contract tracing,
- Capital improvements to public facilities for pandemic operation

Medical Expenses

- Care and services to address near and long-term medical needs

Behavioral Health Care

- Mental health treatment
- Substance misuse treatment
- Crisis prevention
- Outreach to promote access to primary care and preventative medicine

Public Health & Safety Staff

- Covers 100% of payroll for staff entirely devoted to responding to or mitigating the impact of COVID-19

Public Health Program Improvements

- Improvement to data or technology infrastructure
- Planning and analysis to improve programs responding to COVID-19

Disparities in Public Health Outcomes*

- Community health workers
- Public benefits navigators
- Housing services
- Lead remediation
- Community violence prevention programs

*Eligible uses when provided in a Qualified Census Tract (QCT), or other populations, households, or geographic areas that are disproportionately impacted by the pandemic.

2 Respond to the Negative Economic Impacts

Address economic harm from or exacerbated by COVID-19

Unemployment Assistance

- Job training
- Assistance to accelerate rehiring,
- Deposits into State Unemployment Trust Funds

Assistance to Households

- Assistance for food, rent, burials, home repairs
- Eviction prevention services
- Cash assistance

Efficacy of Economic Relief

- Improvements to data or technology infrastructure
- Impact evaluations

Support for Small Business & Non-Profits

- Implementing safer opening procedures
- Loans and grants to mitigate financial hardship from COVID-19

Rehiring SLTT Staff

- Payroll, benefits, and associated costs with rehiring public sector staff back to pre-pandemic levels

Aid to Impacted Industries

- Support safe reopening of industries and business districts
- Provision PPE and COVID-19 prevention measures

Housing & Neighborhood Investments

- Programs addressing homelessness
- Affordable housing development
- Housing navigators and voucher programs

Addressing Educational Disparities

- Early learning programs
- Assistance to high-poverty districts
- Evidence-based educational practices and student well-being initiatives

Providing Healthy Childhood Environments

- High quality childcare and home visit services for new parents
- Enhanced services for child welfare and foster youth programs

3 Premium Pay for Essential Workers

Provide premium pay to eligible workers performing essential work

Premium Pay Eligibility

- Premium pay can be up to $13 per hour in additional wages not to exceed $25,000 per eligible worker
- Essential workers include positions requiring regular in-person or regular physical handling of items that were also handled by others
- Recipients have discretion to designate additional sectors
- Premium pay should prioritize low- and moderate-income workers, who face the greatest mismatch between employment-related health risks and compensation
- Compensation can be retroactive to the beginning of the public health crisis

Sample Eligible Professions

- Staff at nursing homes, hospitals, and home-care settings
- Workers at farms, food production facilities, grocery stores, and restaurants
- Janitors and sanitation workers
- Truck drivers, transit staff, and warehouse workers
- Public health and safety staff
- Childcare workers, educators, and school staff
- Social service and human services staff

4 Revenue Loss

Provide government services to the extent of reduction in revenue

Revenue Defined

- General Revenue includes revenue from taxes, current charges and miscellaneous general revenue.
- It also includes intergovernmental transfers from state and local governments only, NO Federal government transfers.
- General Revenue excludes refunds and other correcting transactions, proceeds from issuance of debt or the sale of investments, agency or private trust transactions and revenue generated by utilities and insurance trusts.

Calculation for the Reduction in General Revenue

$$\text{Max}\left\{\left[\text{Base Year Revenue} * (1 + \text{Growth Adjustment})^{\left(\frac{n_t}{12}\right)}\right] - \text{Actual General } Revenue_t; 0\right\}$$

Base Year Revenue is General Revenue collected in the most recent full fiscal year prior to the COVID-19 public health emergency.

Growth Adjustment is equal to the greater of ~~4.1 percent (0.041)~~ **5.2 percent (0.052)** and the recipient's average annual revenue growth over the three full fiscal years prior to the COVID-19 public health emergency.

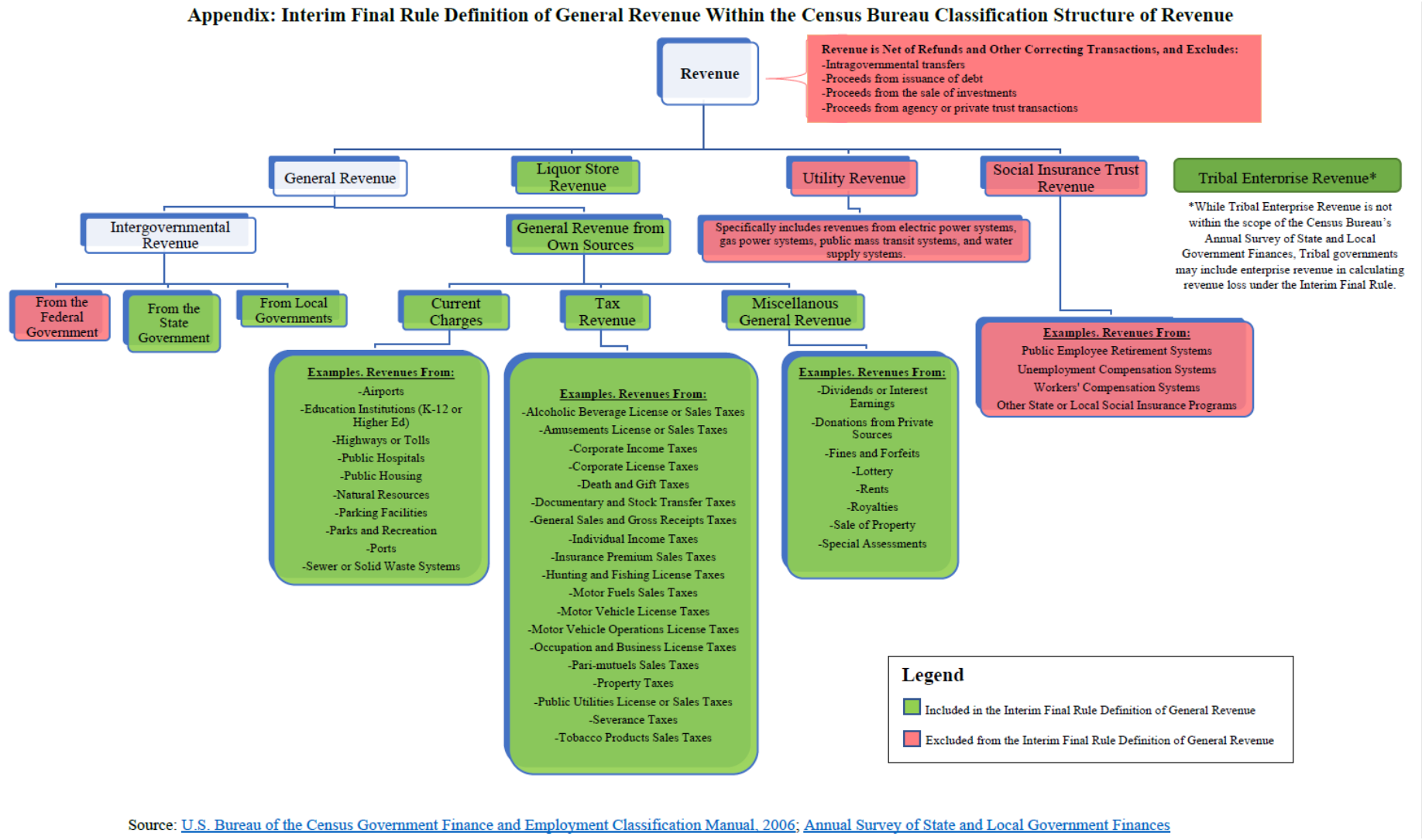
n equals the number of months elapsed from the end of the base year to the calculation date.

Actual General Revenue is a recipient's actual General Revenue collected during the 12-month period ending on each calculation date.

Subscript **t** denotes the calculation date.

- Recipients can calculate revenue loss using four periods of time, December 31, 2020; December 31,2021; December 31 2022; and December 31, 2023
- This timeframe was granted to allow for any lagging impacts of the pandemic which may happen over time.

Interim Final Rule Definition of General Revenue



Source: U.S. Bureau of the Census Government Finance and Employment Classification Manual, 2006; Annual Survey of State and Local Government Finances

5 Investments in Infrastructure

Meet critical needs to provide improvements in infrastructure

Water & Sewer

- Includes improvements to infrastructure, such as building or upgrading facilities and transmission, distribution, and storage systems
- Eligible uses aligned to Environmental Protection Agency project categories across the:
  - Clean Water State Revolving Fund
  - Drinking Water State Revolving Fund

Broadband

- Focus on households and businesses without a wireline connection capable of reliably delivering 25 Mbps download / 3 Mbps upload
- Fund projects that deliver reliable service
  - Minimum 100 Mbps download / 100 Mbps upload speeds unless impracticable
- Complement broadband investments made through the separate Capital Projects Fund

Reporting Requirements

Reporting Requirements

Key dates and timeframes

Interim Report

- Due **August 31, 2021** to cover the period from the date of award to July 31, 2021
- Expenditures by category at the summary level

Quarterly Reports

- Initial report due ~~**October 31, 2021**~~ **January 31, 2022** covering the period from the date of award to December 31, 2021
- Subsequent reports **due within 30 days** after the end of each calendar quarter
- Same general data as the reports submitted for CRF, with some modifications to classifications and additions of data elements related to eligible uses

Expenditure Categories

1: Public Health	
1.1	COVID-19 Vaccination ^
1.2	COVID-19 Testing ^
1.3	COVID-19 Contact Tracing
1.4	Prevention in Congregate Settings (Nursing Homes, Prisons/Jails, Dense Work Sites, Schools, etc.)*
1.5	Personal Protective Equipment
1.6	Medical Expenses (including Alternative Care Facilities)
1.7	Capital Investments or Physical Plant Changes to Public Facilities that respond to the COVID-19 public health emergency
1.8	Other COVID-19 Public Health Expenses (including Communications, Enforcement, Isolation/Quarantine)
1.9	Payroll Costs for Public Health, Safety, and Other Public Sector Staff Responding to COVID-19
1.10	Mental Health Services*
1.11	Substance Use Services*
1.12	Other Public Health Services
2: Negative Economic Impacts	
2.1	Household Assistance: Food Programs* ^
2.2	Household Assistance: Rent, Mortgage, and Utility Aid* ^
2.3	Household Assistance: Cash Transfers* ^
2.4	Household Assistance: Internet Access Programs* ^
2.5	Household Assistance: Eviction Prevention* ^
2.6	Unemployment Benefits or Cash Assistance to Unemployed Workers*
2.7	Job Training Assistance (e.g., Sectoral job-training, Subsidized Employment, Employment Supports or Incentives)* ^
2.8	Contributions to UI Trust Funds
2.9	Small Business Economic Assistance (General)* ^
2.10	Aid to Nonprofit Organizations*
2.11	Aid to Tourism, Travel, or Hospitality
2.12	Aid to Other Impacted Industries
2.13	Other Economic Support* ^
2.14	Rehiring Public Sector Staff
3: Services to Disproportionately Impacted Communities	
3.1	Education Assistance: Early Learning* ^
3.2	Education Assistance: Aid to High-Poverty Districts ^
3.3	Education Assistance: Academic Services* ^
3.4	Education Assistance: Social, Emotional, and Mental Health Services* ^
3.5	Education Assistance: Other* ^
3.6	Healthy Childhood Environments: Child Care* ^
3.7	Healthy Childhood Environments: Home Visiting* ^
3.8	Healthy Childhood Environments: Services to Foster Youth or Families Involved in Child Welfare System* ^
3.9	Healthy Childhood Environments: Other* ^
3.10	Housing Support: Affordable Housing* ^
3.11	Housing Support: Services for Unhoused Persons* ^
3.12	Housing Support: Other Housing Assistance* ^
3.13	Social Determinants of Health: Other* ^
3.14	Social Determinants of Health: Community Health Workers or Benefits Navigators* ^
3.15	Social Determinants of Health: Lead Remediation ^
3.16	Social Determinants of Health: Community Violence Interventions* ^
4: Premium Pay	
4.1	Public Sector Employees
4.2	Private Sector: Grants to Other Employers
5: Infrastructure[27]	
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5.9	Clean Water: Nonpoint Source
5.10	Drinking water: Treatment
5.11	Drinking water: Transmission & Distribution
5.12	Drinking water: Transmission & Distribution: Lead Remediation
5.13	Drinking water: Source
5.14	Drinking water: Storage
5.15	Drinking water: Other water infrastructure
5.16	Broadband: "Last Mile" projects
5.17	Broadband: Other projects
6: Revenue Replacement	
6.1	Provision of Government Services
7: Administrative	
7.1	Administrative Expenses
7.2	Evaluation and Data Analysis
7.3	Transfers to Other Units of Government
7.4	Transfers to Non-entitlement Units (States and territories only)

*Denotes areas where recipients must identify the amount of the total funds that are allocated to evidence-based interventions (see Use of Evidence section above for details)

^Denotes areas where recipients must report on whether projects are primarily serving disadvantaged communities (see Project Demographic Distribution section above for details)

Guidehouse