

SALT LAKE CITY
ARPA Community Grant Program:
Community Recovery Assistance Grants
(CRAG) Applicant Handbook



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S A L T L A K E C I T Y

HOUSING STABILITY DIVISION

COMMUNITY and NEIGHBORHOODS DEPARTMENT

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Program Overview

Salt Lake City has established the ARPA Community Grant Program with State and Local Fiscal Recovery Funds (SLFRF) provided by the federal American Rescue Plan (ARPA). This funding is provided to nonprofit organizations who require resources to address ongoing needs in their community in the wake of COVID-19. Nonprofit organizations who apply will use these funds to provide critical direct services to low- to moderate-income members of the community in the municipal boundaries of Salt Lake City. **This funding is separate from the ARPA Community Grant Program funding available through the Department of Economic Development (DED) for small business recovery and nonprofit art/artisan assistance.**

CRAG funds are administered by the Department of Community and Neighborhoods (CAN) and are allocated through a competitive application process. Applications will be evaluated based on ARPA SLFRF eligibility requirements; Federal, State, and City activity standards and regulations; and alignment with collective impact outcomes as defined through a collaborative process with community stakeholders including Salt Lake City, Salt Lake County, the State of Utah, the Salt Lake Chamber of Commerce, and the U.S. Treasury Department.

Term Dates

Funding will be made available to applying nonprofit organizations beginning on **September 1st, 2022** for fiscal year 2022-2023. The application process may be repeated the following year if needed until all funds have been obligated. Contract terms for FY22-23 will begin no later than Jan. 1, 2023. CRAG funds may be used to cover eligible costs incurred no earlier than March 3, 2021. In certain circumstances, funds may be used to cover costs before this date (i.e., costs incurred by nonprofit clients/beneficiaries or previously planned project costs), provided the costs were not incurred by the funding recipient before March 3, 2021. **All CRAG funds must be expended by December 31, 2024.**

Funding Amounts

The City has allocated \$4 million of awarded SLFRF ARPA funding for the Community Recovery Grant, \$2 million of which serves the CRAG Program administered by CAN. The other \$2 million will be administered by DED and will serve small businesses and nonprofit art/artisan organizations. Applicants may apply for a maximum of \$100,000 in program funding, with a minimum request of \$30,00. Agencies may submit more than one request to fund different programs and may in select cases be eligible to apply for both CAN and DED funding. Not all agencies approved for funding will receive the maximum amount requested.

Marketing & Outreach

The Department of Community and Neighborhoods (CAN) will engage in targeted outreach and marketing of the grant program to communities most in need of continued COVID-related recovery aid. Advertisement of funding availability will be made to these communities in consultation with the Mayor's Office, the City Council, the Office of Equity and Inclusion, the Human Rights Commission Board, the Civic Engagement Team, as well as other recognized community organizations and nonprofit community partners. The city may also promote advertisements of those nonprofit organizations who receive funding. Applications will be evaluated on their client marketing and outreach strategies.

In all these efforts, CAN will ensure outreach and marketing is both equitable and efficacious in reaching the desired audience. CAN will utilize available data to direct outreach to nonprofit organizations who serve communities and populations most affected by COVID and who will benefit most from grant funding. Public outreach will include training presentations during the application period on September 13, 2022. Materials will be available in English and Spanish.

Application Process

Applications for funding will be available beginning **September 1, 2022 and will remain open for 30 days**. For agencies who wish to secure funding for multiple activity categories, an application must be submitted for each program. Agencies interested in applying for both CRAG and DED funding may inquire if they qualify. Agencies who apply for both funding streams must indicate they have done so in both applications.

Scoring & Review

Application scoring will prioritize submissions with demonstrated program need and equity of proposed services. Scoring may be weighted based on a variety of factors, including agency size, degree of community integration, previous funding levels, and percentage of funding to be used for direct services. Scoring will also ensure that proposals are evidence-based and data-driven, and that funding amounts are proportional to projected outcomes. Applicants are encouraged to consult the Treasury SLFRF Equity & Outcomes Resource Guide when preparing their submission. Once submitted, applications will be reviewed by CAN staff for compliance with program requirements. CAN staff may request additional information if applications are not complete or are missing necessary documentation. Application assistance is offered as a part of the program Technical Assistance (see below). Any applicant may request this assistance to help improve or complete their application. Once reviewed by CAN staff, applications will be scored and publicly reviewed by the Community Recovery Committee. The Mayor and City will review the Committee's recommendations and approve final funding decisions. Awarded agencies will be notified if their organization is selected for grant funding to begin the contracting process.

Eligibility

CRAG funded activities are intended to support ongoing public health and economic recovery from COVID, assisting low- to moderate-income households who are most impacted by the pandemic. Grants are provided to agencies to fund direct services, and as such awarded agencies will be classified as subrecipients, not beneficiaries. Applying agencies must be registered as 501(c)(3) entities and be registered in the federal System for Award Management (SAM). Eligible services must comply with the following requirements:

- Principally benefit low- to moderate-income (LMI) persons.
- The provision does not authorize waivers or modifications from requirements related to nondiscrimination, labor standards, or environmental considerations.
- Beneficiaries must live in the incorporated boundaries of Salt Lake City.

As outlined, service eligibility is primarily verified by AMI and LMI metrics. Additional methods of service eligibility verification may include the following:

- By Area Benefit, i.e., LMI, AMI, QCT, or high poverty/disproportionally impacted school districts.
- By Presumed Benefit, including victims of domestic violence; homeless individuals; illiterate adults; severely disabled adults; households experiencing food insecurity; households that qualify for the Children's Health Insurance Program, Childcare Subsidies through the Child Care Development Fund (CCDF) Program, or Medicaid; students who lost access to in-person instruction for significant periods of time; etc.
- By Individual Reported Benefit in the form of self-reported income for individuals/households.

In addition to direct client services, program funding may be allocated to direct service staffing expenses related to program delivery, or administrative expenses for program oversight. Administrative expenses may be charged both as direct and indirect costs to a program. Direct administrative expenses are capped at 20% of award total. Agencies with a negotiated indirect cost rate agreement (NICRA) may request an indirect cost budget category at this rate for each of their program applications. Certification will be required for those who use their NICRA rate. For agencies who do not have a NICRA, they may request the de minimis indirect cost rate of 10% for each of their programs. Non-eligible expenses

include, but are not limited to capital investments, food assistance programs, unemployment benefits, childcare, housing vouchers, mortgage assistance, political activities, or personal expenses.

CRAG Eligible Activity & Expenditure Categories

Each funded nonprofit organization must ensure its program falls within the appropriate activity and expenditure categories:

- **Activity Categories:** Salt Lake City Council has identified 6 areas of focus for Community Recovery spending. Any funding received through CAN must fall within one of these 6 categories. These categories are:
 - Retraining Displaced Workers
 - Legal Services for Eviction Assistance
 - Expanded Educational Opportunities
 - Resources to Mitigate the Digital Divide
 - Access to Healthcare for Underserved Populations
 - Mental Health Assistance

Additional details about each eligible category are available below.

- **Expenditure Categories:** Each Activity Category includes one or more Expenditure Categories as an additional layer of classification for the eligible uses of funds. These categories have been provided by the Treasury Department and are required in our reporting to ensure funds are being spent appropriately. Any ARPA funding received through CAN must fall within one these categories. Agencies may not apply multiple Expenditure Categories for one program. Expenditure Categories will encompass direct staffing costs, direct administrative costs (up to 20%), or indirect costs associated with services rendered (i.e., case manager staffing costs for the “Mental Health Services” Expenditure Category). Several of these Expenditure Categories may be more general than their parent Activity Categories. Available Expenditure Categories and their eligibility details are listed below under each Activity Category.

Treasury cautions grantees and subgrantees that recordkeeping clearly document all uses of funds to satisfy the statutory purposes of ARPA and SLFRF. CAN will work with recipients of CRAG funds to ensure proper eligibility and documentation that meets Treasury compliance. Available CRAG funding will be distributed between the 6 activity categories during scoring and review of applications, and reviewers will endeavor to ensure equal distribution of funding between each category. CAN and the Community Recovery Committee will review applications to ensure the scope of submissions falls within the appropriate Activity and Expenditure Categories.

Retraining Displaced Workers

Description: Providing job-training assistance to household workers who qualify as LMI and who have experienced negative economic impacts from COVID.

Expenditure Category:

- “Assistance to Unemployed or Underemployed Workers”
 - **Job Training is the only assistance Activity permitted by CAN in this Expenditure Category.**

Treasury SLFRF Guidance:

- Job training funding should be used to accelerate the hiring of unemployed or underemployed workers who fall within the low- to moderate-income range (LMI).
- As defined by the SLFRF Final Rule, eligible beneficiaries are “individuals who want and

are available for work, including those who have looked for work sometime in the past 12 months or who are employed part time but who want and are available for full-time work.” This includes unemployed, underemployed, or fully employed workers.

- Assistance to unemployed workers may include both workers who lost their jobs during the pandemic and workers who were unemployed when the pandemic began.
- Fully employed workers who are seeking to move to a job that provides better opportunities for economic advancement, such as higher wages or more opportunities for career advancement, are also eligible for job training per Treasury guidance.
- Job training may take the form of combined education and on-the-job training programs.

Legal Services for Eviction Assistance

Description: Providing nonprofit legal assistance to prevent evictions of those who qualify as LMI and who have experienced negative economic impacts from COVID.

Expenditure Category:

- “Household Assistance: Rent, Mortgage, and Utility Aid”
 - Treasury has combined rental assistance, mortgage, utility aid, and eviction assistance all under the same Expenditure Category. However, the **only assistance Activity permitted by CAN in this Expenditure Category is Legal Services for Eviction Assistance.**

Treasury SLFRF Guidance:

- The SLFRF Final Rule outlines eligible activities related to legal service for eviction prevention, including, “legal aid such as legal services or attorney’s fees related to eviction proceedings and maintaining housing stability, court-based eviction prevention or eviction diversion programs, and other legal services that help households maintain or obtain housing.”
- Legal Services for Eviction Assistance funding should be used to assist LMI households.

Expanded Educational Opportunities

Description: Providing resources to address educational disparities or promote early learning for those who qualify as LMI and who have experienced negative impacts from COVID.

Expenditure Categories:

- “Household Assistance: Rent, Mortgage, and Utility Aid”
- “Healthy Childhood Environments: Early Learning”
- “Addressing Educational Disparities: Aid to High-Poverty Districts”
- “Addressing Educational Disparities: Academic, Social, and Emotional Services”
- “Addressing Educational Disparities: Mental Health Services”
- “Address Impacts of Lost Instructional Time”

Treasury SLFRF Guidance:

- Expanded Educational Opportunities includes several different eligibility categories, including addressing educational disparities, addressing impacts of lost instructional time, and healthy childhood environments: early learning. Demographic and other eligibility requirements will vary between expenditure categories. For additional information, applicants are encouraged to consult the SLFRF Final Rule and the SLFRF Final Rule Overview.
- While funding recipients may presume under the SLFRF Final Rule that any K-12 student who lost access to in-person instruction for a significant period has been impacted and is thus eligible for services, providers are still encouraged to prioritize LMI, QCTs, and households for responsive services.

Resources to Mitigate the Digital Divide

Description: Providing internet access or digital literacy assistance to households negatively impacted by limited internet capabilities and who qualify as LMI.

Expenditure Category:

- “Household Assistance: Internet Access Programs”

Treasury SLFRF Guidance:

- Eligible uses under this category can include a wide range of programs and services to expand internet access and digital literacy, such as subsidies for the cost of internet service, other programs that support adoption of internet service where available, or digital literacy programs.
- Programs that fall under this activity category are NOT intended to address capital investment, i.e., broadband investment, large hardware purchases, etc.

Access to Healthcare for Underserved Populations

Description: Providing resources to address basic health needs for the community in COVID mitigation and prevention, community violence interventions, or financial assistance for LMI households’ medical needs exacerbated COVID.

Expenditure Categories:

- “COVID-19 Vaccination”
- “COVID-19 Testing”
- “COVID-19 Contact Tracing”
- “Other COVID-19 Public Health Expenses (including Communications, Enforcement, Isolation/Quarantine)”
- “Household Assistance: Paid Sick and Medical Leave”
- “Household Assistance: Health Insurance”

Treasury SLFRF Guidance:

- Providing Access to Healthcare for Underserved Populations includes several different Eligibility categories, including COVID-19 Mitigation & Prevention services, Substance Use services, Household Assistance, Paid Sick and Medical Leave, and Health Insurance. Demographic and other eligibility requirements will vary between expenditure categories. For additional information, applicants are encouraged to consult the SLFRF Final Rule (31 CFR Part 35 Subpart A) and the SLFRF Final Rule Overview.
- Treasury has clarified that “recipients can provide COVID-19 mitigation and prevention services to members of the general public without any further analysis of impacts of the pandemic on those individuals and whether the service is responsive.” CAN will work with recipients in determining appropriate metric reporting for those served. This is also true with substance use substance use services.
- Funding recipients may also respond to increased rates of COVID-19-related services at a population level or, for an individual, new COVID-19-related challenges or exacerbation of pre-existing challenges, including new barriers to accessing treatment when providing services.

Mental Health Assistance

Description: Providing resources to address mental health or substance use needs that have resulted from or been exacerbated by COVID for those who qualify as LMI.

Expenditure Categories:

- “Mental Health Services”
- “Substance Use Services”

Treasury SLFRF Guidance:

- Programs in this activity category are cover an expansive array of services for prevention, treatment, recovery, and harm reduction for mental health, substance use, and other behavioral health challenges caused or exacerbated by the public health emergency.
- Treasury has clarified that “recipients can provide behavioral health services to members of the general public without any further analysis of impacts of the pandemic on those individuals and whether the service is responsive.” CAN will work with recipients in determining appropriate metric reporting for those served. Funding recipients may also “respond to increased rates of behavioral health challenges at a population level or, at an individual level, new behavioral health challenges or exacerbation of pre-existing challenges, including new barriers to accessing treatment.”

Documentation

Funding will only be made available to organizations with proper documentation.

Documentation requirements will include the following:

- Tax documentation of 501(c)(3) status
- Proof of worker’s compensation compliance
- Proof of liability insurance
- Proof of SAM.gov UEID #
- Most recent financial audit (if applicable)
- NICRA certificate (if applicable)
- Completed CAN federal grant budget form
- Completed CAN disability & non-discrimination employment form
- List of current board members

Additional documentation may also be requested to ensure program expenses are not currently or were not previously paid by other awarded federal COVID recovery funds. Preference will be given to agencies with thorough policies, procedures, and bylaws, including robust organizational checks and balances. Awarded agencies will be expected to track grant funds separately from general operating funds. Applying agencies are not required to have previously received or applied for federal funding.

Reporting

Awarded agencies are expected to report quarterly on the progress of their program, including the number of individuals/households impacted, demographic information of those served, and other relevant program metrics. Templates for reporting will be provided to awarded agencies, and information on program reporting will be provided during the grant awardee training. Reports will be submitted until all funds are spent. Subrecipients of funding will be expected to be familiar and comply with Treasury reporting regulations. These include different reporting requirements for each Expenditure Activity. For these and additional reporting requirements, please refer to the SLFRF Compliance and Reporting Guidance (see Additional Resources).

Monitoring

By Treasury mandate CAN is required to manage and monitor subrecipients use of awarded funds to ensure compliance with requirements of ARPA award (2 CFR 200.332). Risk assessments will be conducted for each application during the scoring process, and compliance monitoring plans will be established for awarded agencies based on these risk assessments.

Reimbursement Process

CRAG is a reimbursement-based grant program, meaning funds awarded are not distributed to agencies until after relevant costs are incurred and relevant invoices are submitted. Appropriate documentation justifying expenses will be required for reimbursements to be approved. CAN

will offer ongoing technical support to help grant recipients through the reimbursement process. For nonprofit organizations that may struggle to cover costs between reimbursements, invoice payments can be processed and submitted monthly. More frequent invoicing or additional accommodations may be provided upon request and in consultation with CAN staff.

Technical Assistance

To provide equitable opportunity to all potential applicants, CAN will provide technical assistance to all interested candidates to answer questions, assist with software, or provide further explanation regarding the program. This technical assistance can be requested in another language.

Our staff will offer the following assistance to nonprofit organizations:

- **Informational Webinars:** an informational webinar will be provided during the application process for potential applicants. This webinar will review eligibility requirements, funding schedules, required documentation, and approved uses of funding. This webinar will be held jointly with DED and will be held separately in both English and Spanish. A second webinar will be hosted reviewing reporting requirements, reimbursement procedures, and uses of funds. This webinar will also be held in English and Spanish. Both webinars will be recorded and made available on the CAN website so applicants and awardees can watch these webinars at their own convenience.
- **One-on-One Appointments:** If needed, applicants can schedule appointments with CAN staff for one-on-one assistance. Appointments will be available in-person (City Hall), over Zoom, or over the phone. Assistance can be provided in both English and Spanish.
- **Sorenson Unity Center Computer Lab:** Applicants can visit the Sorensen Unity Center Computer Lab (1383 S 900 W) for one-on-one assistance with their staff. The computer lab is open to the public 9 am-9 pm Monday-Friday, and 9 am-5 pm Saturdays.
- **Assistance in multiple languages:** If applicants need assistance in languages other than English or Spanish, staff can work with the SLC Mayor's Office of Equity & Inclusion to coordinate translation & interpretation services.

ZoomGrants Management Software

CRAG funds are administered through the ZoomGrants management software. Program uses of ZoomGrants include application submission and review, scoring, contract recording, reimbursement requests, budget monitoring, and quarterly program reporting. Tutorials on how to use ZoomGrants will be provided in application and awardee presentations, as well as on the CAN website. Funded agencies will be expected to use ZoomGrants and any additional program management software implemented in the future.

Citizenship Requirements

SLFRF and CRAG do not have immigration or citizenship status eligibility requirements that would bar a person from accessing services. As such, funding recipients are not required to verify immigration status of applicants for federal, state, or local public benefits.

State and Local Fiscal Recovery Funds (SLFRF) Summary

On March 11, 2021, the American Rescue Plan Act was signed into law and established the Coronavirus State Fiscal Recovery Fund and Coronavirus Local Fiscal Recovery Fund, which together make up the Coronavirus State and Local Fiscal Recovery Funds (SLFRF) program. This program is intended to provide support to State, territorial, local, and Tribal governments in responding to the economic and public health impacts of COVID and in their efforts to contain impacts on their communities, residents, and businesses. The program ensures that governments can provide the necessary community resources to:

- Fight the pandemic and support families and businesses struggling with its public health and economic impacts.
- Maintain vital public services, even amid declines in revenue.
- Build a strong, resilient, and equitable recovery by making investments that support long-term growth and opportunity.

The amount of funding Salt Lake City received is determined using the same method as federal CDBG funding determinations. This is done using a HUD formula that considers population lag, pre-1940 housing, and poverty rates, among other factors. The CRAG funding must show evidence that it will be used for a program that prevents, prepares for, and/or responds to coronavirus. CRAG activities must meet one of the program's four national objectives. All funds must be used to assist activities that meet low- to moderate-income funding requirements.

Additional Resources

Salt Lake City CAN/HSD Resources

Community Recovery Assistance Grants Program Slides

- Available in English and Spanish upon request

Treasury Resources:

SLFRF Policies & Procedures

31 CFR Part 35 Subpart A (online linked version)

<https://www.ecfr.gov/current/title-31/part-35>

Final Rule, Federal Register Vol. 87, No. 18 (Jan 2022)

<https://www.govinfo.gov/content/pkg/FR-2022-01-27/pdf/2022-00292.pdf>

Overview of the Final Rule (Jan 2022)

<https://home.treasury.gov/system/files/136/SLFRF-Final-Rule-Overview.pdf>

Final Rule FAQs (April 2022)

<https://home.treasury.gov/system/files/136/SLFRF-Final-Rule-FAQ.pdf>

Compliance & Reporting Guidance (June 2022)

<https://home.treasury.gov/system/files/136/SLFRF-Compliance-and-Reporting-Guidance.pdf>

Assistance Listing 21.027 [SLFRF] Compliance Supplement (April 2022)

<https://home.treasury.gov/system/files/136/21.027-SLFRF-2022-Compliance-Supplement.pdf>

SLFRF Equity & Outcomes Resource Guide (June 2022)

<https://home.treasury.gov/system/files/136/SLFRF-Best-Practices-Guide.pdf>

Treasury SLFRF Website

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

Treasury Presentation Slides

SLFRF Final Rule Introduction Slides:

<https://home.treasury.gov/system/files/136/SLFRF-Final-Rule-Webinar.pdf>

SLFRF Equity & Outcomes Slides:

<https://home.treasury.gov/system/files/136/SLFRF-Promising-Practices-Equity-and-Community-Engagement.pdf>

or

<https://home.treasury.gov/system/files/136/SLFRF-Promising-Practices-Metrics-and-Evaluation.pdf>

SLFRF Evidence-Based Intervention Slides:

<https://home.treasury.gov/system/files/136/SLFRF-Evidence-Webinar.pdf>

CRAG Program Appendices

The attached appendices are supplemental to the previously detailed CRAG policies and procedures. These include the following:

Appendix A: [Salt Lake City Ordinance No. 17 of 2022](#)

- This City Ordinance amends Lake City Code Chapter 2.20 to establish the Community Recovery Committee and Community Grant Program.

Appendix B: Glossary of Terms

American Rescue Plan Act (ARPA) – A \$1.9 trillion economic stimulus bill passed by Congress and signed into law on March 11, 2021. The Act is intended to provide additional relief to address the continued impact of COVID-19 (i.e., coronavirus disease 2019) on the economy, public health, state and local governments, individuals, and businesses.

Area Median Income (AMI) - the midpoint of a region’s income distribution – half of families in a region earn more than the median and half earn less than the median. For this program, AMI is one of the ways to identify individuals and households eligible to receive services.

ARPA Community Grants Program (CGP) – The Community Grants Program was adopted into ordinance by the Salt Lake City Council on April 19, 2022. The Program was created to deploy \$4 million in ARPA funds to support disproportionately impacted communities in the City and mitigate the negative economic impacts to the City’s local businesses and nonprofit organizations. The funds will be equally divided between the Department of Economic Development (DED) Community Grants Program – Small Businesses (CGP-SB) and Community and Neighborhoods (CAN) Community Recovery Assistance Grants Program (CRAG).

Community & Neighborhoods Department (CAN) – The Department of Community and Neighborhoods is focused on creating Sustainable, Equitable, Growing, and Opportunity-rich (“SEGO”) communities and neighborhoods in Salt Lake City. SLCCAN does this through an emphasis on providing upward mobility and housing choice for City residents, community investments and transportation options, making Salt Lake City a “15-minute City,” and ensuring all efforts promote a safe and healthy built environment.

Community Recovery Assistance Grants Program (CRAG) – The Community Recovery Assistance Grants Program (CRAG) is the \$2 million of ARPA Community Grants Program (CGP) funds managed by Community and Neighborhoods (CAN). It funds nonprofit organizations providing necessary direct services to the Community in the continued recovery from COVID-19. The program focuses on six areas of focus for recovery efforts, namely Retraining Displaced Workers, Legal Services for Eviction Assistance, Expanded Educational Opportunities, Resources to Mitigate the Digital Divide, Access to Healthcare for Underserved Populations, and Mental Health Assistance.

Community Recovery Committee (CRC) - The CRC is a new committee adopted into ordinance by the Salt Lake City Council on April 19, 2022. The CRC will oversee the ARPA Community Grants Program and make recommendations to the Administration. The Committee will review all grant applications while considering federal requirements and geographic equity and make funding recommendations to the Mayor and City Council.

Department of Economic Development (DED) – formed in 2016, SLC DED is focused on building Salt Lake City as a place that is economically accessible to everyone. DED works to streamline processes, provide excellent customer service, and offer an array of resources and services to recruit and retain businesses in Salt Lake City, and ensure that they have the tools to thrive.

Low- to Moderate-Income Households (LMI) - defined as families and individuals whose total gross household incomes is at or below 40% AMI (low) and 65% AMI (medium) respectively.

Qualified Census Tract (QCT) – geographic areas in which 1) 50% or more of the households are income eligible and 2) the population of all census tracts that satisfy this criterion does not exceed 20% of the total population of the respective area. For this program, QCT is one of the ways to identify individuals and households eligible to receive services.

State and Local Fiscal Recovery Funds (SLFRF) - The Coronavirus State and Local Fiscal Recovery Funds (SLFRF) program, a part of ARPA, delivers \$350 billion to state, local, and Tribal governments across the country to support their response to and recovery from the COVID-19 public health emergency. It is through SLFRF that the ARPA Community Grants Program is funded.

ZoomGrants– a grant management software that the Salt Lake City uses for the administration of many of its grant applications.

Additional appendices may be added as is deemed necessary to communicate policies and procedures for the CRAG program. All appendices shall be enforced as CRAG policies and procedures as of August 2022.