Recommendations to the Office of Management and Budget
Methods and Leading Practices for Advancing Equity and Support for Underserved Communities through Government
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Partners for Rural Transformation is a coalition of six Community Development Financial Institutions (CDFIs) that serve three-quarters of the country's persistent poverty counties, communities that are overwhelming rural and people of color. With headquarters in the Mississippi Delta, Appalachia, Native American communities, the Deep South, the Rio Grande Valley and regions in the Rural West, the Partners for Rural Transformation has a unique lens on the range of challenges these communities face, solutions to them, and deep connections with diverse local leaders who are dedicated to creating change.

The recommendations included here are rooted in decades of experience, which includes deploying over $2 billion, reaching millions of people who reside in persistent poverty communities.

Members of the Partners for Rural Transformation are lenders and participants in numerous federal initiative such as, but not limited to those run by the Small Business Administration, U.S. Department of Treasury, Federal Housing Finance Administration, U.S. Department of Housing and Urban Development, CDFI Fund, and U.S. Department of Agricultural, and the Environmental Protection Agency.

In these comments, Partners for Rural Transformations provides responsive comments regarding:

- Equity Assessments and Strategies
- Barrier and Burden Reduction
- Financial Assistance
- Stakeholder and Community Engagement

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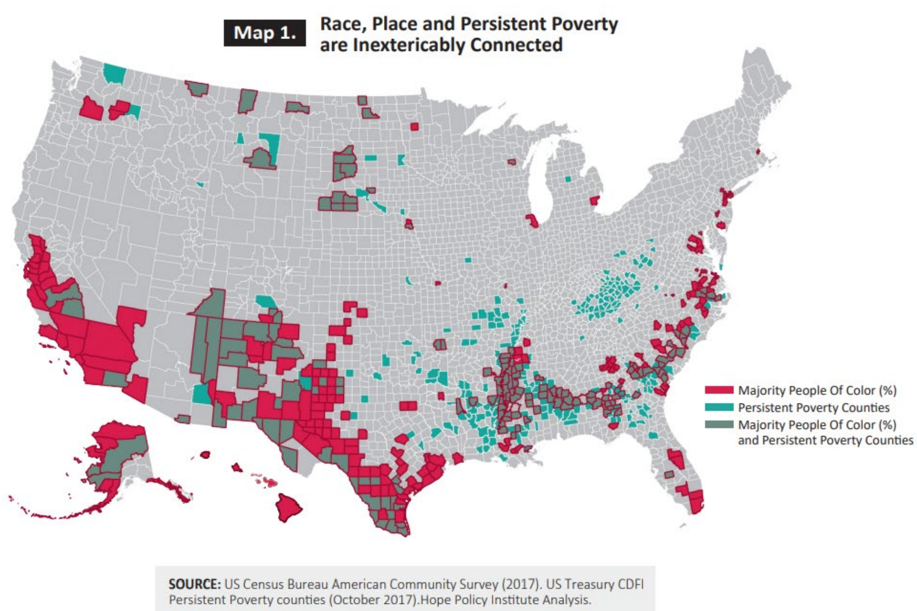
Executive Order 13985 aptly names persistent poverty areas as one among those which exemplify the definition of underserved.[1] Inclusive and equitable distribution of federal government resources to persistent poverty communities is a critical part of the strategy to transform these communities, which are predominantly rural and home to people of color, into areas of persistent prosperity for all. This comment focuses specifically on recommendations related to ensure equity in the federal government's reach to persistent poverty communities.

Setting the Context for Our Recommendations

Partners for Rural Transformation submits these comments against the backdrop of the existing underinvestment and economic disparities facing persistent poverty areas. As defined by the U.S. Treasury CDFI Fund, persistent poverty is defined as an area with a poverty rate of 20% or higher for 30 years in a row.[2] Of the country's 395 persistent poverty counties, eight out of ten are nonmetro and the majority (60%) of people living in persistent poverty counties are people of color. See Map 1.



Regions of deep and persistent poverty were not an accident – formed by policy choices that facilitated the acquisition of wealth and power among a select group through the enslavement of Africans and African Americans in the Mississippi Delta and Black Belt, the taking of land and life from tribal nations and Latinx people throughout the country and along the U.S./ Mexico border, and the extraction of natural resources from Appalachia. Today, the consequence of history manifest in other forms of distress and structural exclusion– high unemployment, a lack of access to banking services, a paucity of quality affordable housing and safe drinking water – yet all of which contribute to higher rates of premature death and lower health outcomes:

- 86% of persistent poverty counties have unemployment rates in excess of the national average;
- Three-quarters of the 158 counties nationwide that have household unbanked/underbanked rates at 1.5 times the national average are persistent poverty counties;

- Eighty-one percent (81%) of persistent poverty counties are in the bottom quartile of counties in terms of health outcomes; and
- Of the 395 persistent poverty counties, a "health related drinking violation" occurred in approximately 42% of the counties – nearly five percentage points higher than the rate nationally.

Importantly, solutions exist. For decades, members of Partners for Rural Transformation--CDFIs in some of the most economically distressed regions of the country--have been addressing the employment and housing, banking and infrastructure needs of local people and places.[3] Collectively, in the last 10 years alone, members of Partners for Rural Transformation, have deployed over $2 billion reaching millions of people who reside in persistent poverty communities. These investments have been in the form of mortgage lending, small dollar loans, community investments of hospitals and non-profit organizations, rural water systems, broadband, small business loans, housing counseling, and more.

Leveraging federal resources to reach small, nonmetro communities is a critical part of this strategy. The recent Paycheck Protection Program (PPP) is just one of many examples of how CDFIs rooted in persistent poverty areas ensure federal resources reach those otherwise bypassed by them. Through their individual PPP lending programs, three PRT members – HOPE, RCAC, and Communities Unlimited - collectively saved more than 17,000 jobs, deployed over $160 million in capital through more than 5,600 PPP loans. A majority of these loans went to small businesses owned by people of color. One-third of HOPE's PPP loan volume flowed to persistent poverty counties, as did more than a third of each of RCAC's and Community Unlimited's PPP loans.

Despite evidence of solutions to meet the needs of rural, persistently poor communities, philanthropic, bank and federal investment in community and economic development in regions of persistent poverty dramatically lags behind investment in places with significantly more resources, perpetuating and exacerbating inequity.

- From 2010-2014, grant making in Appalachia, the Mississippi Delta and the Rio Grande Valley was around $50 per person – well behind the national average of $451 and $4,096 in San Francisco.[4] Data for Native Communities was not available.

- Bank investment trails in poor rural areas as well. In 2018, only 31 cents of every dollar borrowed by rural CDFIs was from a bank. In contrast, over half the borrowed funds from urban CDFIs were supplied by banks.[5]

- Federal investment for community development in rural areas remains well behind dollars available for community development in cities. From 1994-2001 the federal government invested twice as much, per capita, on community development in metropolitan areas than in rural areas.[6]

A more detailed analysis of persistent poverty communities, and how CDFIs are change agents for economic opportunities within them, see the attached policy brief, Transforming Persistent Poverty in America: How Community Development Financial Institutions Drive Economic Opportunity. A virtual visit to the regions served by Partners for Rural Transformation, and leaders advancing change for their communities, can be found at PRT's YouTube Channel here: https://www.youtube.com/watch?v=EGZFb1zX5EA

In light of this context, the Partners for Rural Transformations provides solutions to increase the federal government's equitable reach into persistent poverty areas, focusing on the following: comments regarding:

- Equity Assessments and Strategies
- Barrier and Burden Reduction
- Financial Assistance
- Stakeholder and Community Engagement

Equity Assessments and Strategies

Impact and reach into Persistent Poverty Counties should be a metric that federal agencies use to target and assess their impact.

Implementation of this recommendation is eased by the annual publication of persistent poverty counties. The list of persistent poverty counties is published annually by the CDFI Fund and easily available online as an excel spreadsheet.[7] Federal agencies should utilize this list to guide not only stakeholder engagement, assessment of potential impact, but also to assess and report on actual resource deployment after the fact.

There are multiple examples of federal legislation and regulation recognizing the unique challenges of persistent poverty communities. Several prioritize investments into persistent poverty counties and have reporting requirements as to how federal funds were deployed to reach persistent poverty counties. For example, the Consolidated Appropriations Act of 2021 references Persistent Poverty 18 times. In addition to Treasury and USDA, the Department of Commerce, the Environmental Protection Agency and the Department of Transportation all create funded preferences for persistent poverty areas.

A non-exhaustive list of additional examples include:

- CDFI Fund: The Consolidated Appropriations Act of 2021, like previous appropriations bills, provides that "…of the funds awarded under this heading, not less than 10 percent shall be used for awards that support investments that serve populations living in persistent poverty counties…"[8] The supporting Committee Report further "directs the Treasury to report to the Appropriations Committee…how the CDFI Fund will ensure fiscal year 2021 recipients will serve non-metropolitan and rural areas and populations living in persistent poverty counties." [9]

- Emergency Capital Investment Program: The Consolidated Appropriations Act of 2021, in creating the Emergency Capital Investment Program, includes persistent poverty counties as underserved communities to be supported by the emergency infusion of capital to CDFIs and MDIs.[10] Further in its implementing guidelines, though not prescribed by statute, Treasury doubles the weight of lending in persistent poverty counties as "deep impact lending" that counts towards a CDFI/MDI's eligibility for a rate reduction in repayment of the capital.[11]

- Community Facilities Relending Program: Though not proscribed by an enabling statute, U.S. Department of Agriculture (USDA) regulations for the program prioritizes lenders reaching persistent poverty counties. It requires participating lenders to both have demonstrated lending experience in persistent poverty counties, as well as demonstrate future ability to target investments there.[12]

- Other USDA Programs: The enabling statute for the Rural Business-Cooperative Service Program, providing technical assistance and training grants to support rural business applications for USDA programs, provides: "In selecting recipients of grants under this section, the Secretary shall give priority to grants serving persistent poverty counties and high poverty communities, as determined by the Secretary."[13] Similarly, the Committee Report for Agriculture, Rural Development, and Food and Drug Administration for the Consolidated Appropriations Act of 2021, "supports targeted investments in impoverished areas, particularly in persistent poverty counties."[14]

Specific recommendations for expanding the use of persistent poverty areas to guide federal agencies' prioritization and assessment of funds include but are not limited to:

- Federal agencies, including the Federal Reserve, should report on the amount of CARES Act, American Rescue Plan, and other COVID-19 relief funding that reaches persistent poverty counties. Understanding the extent to which persistent poverty areas benefited or were excluded from COVID relief aid provides a baseline of understanding for future recovery needs for these communities. For example, Partners for Rural Transformation provided specific recommendations of such a recommendation can and should be carried out in the deployment of the State Small Business Credit Initiative (SSBCI). These recommendations can be reviewed in detail in PRT's recent policy brief on SSBCI, and can be applicable in the deployment of other funding streams: Ensuring State Small Business Credit Initiative Funds Reach Persistent Poverty Communities.

- Report across all CDFI Fund programs on the amount of dollars and services extended into persistent poverty areas. Currently, per Congressional mandate, the CDFI Fund reports how much of the CDFI Program and NACA Program Financial Assistance and Technical Assistance awards go to CDFIs with a commitment to serve persistent poverty counties. This reporting requirement should extend to all CDFI Fund program areas.

- Govern all federal stimulus bills with the 10-20-30 anti-poverty investment formula. This funding formula mandates that 10 percent of spending be disbursed to areas where 20 percent of the population has been below the poverty line for 30 consecutive years. This formula ensures that the geographic poverty concentrations receive the lifeblood of federal investment; something not guaranteed in the absence of the 10-20-30 formula.

Effective equity and assessment strategies also require good, robust data that accurately reflect the reality of persistent poverty communities and the diversity of people who live there. As PRT member Fahe noted in their recent comments to the Census Bureau, "Rural communities, with their smaller populations, are in particular need of high quality, publicly available (de-identified) data in order to make planning decisions and to effectively deploy resources."[15] Utilizing this data is critical in decision making not only federal government agencies, but also non-profit and community based organizations, making decisions about resource allocation and investments in things like in housing, economic development, educational facilities, and recovery programs.

Finally, when considering equity for persistent poverty, rural, and communities of color, we recommend OMB evaluate when agencies, government grantmaking bodies, or government-chartered entities (such as GSEs and FHLBs) may be creating funding eligibility rules that will exclude these populations from access to resources. An example would be if a community development funding source has in place urban standard broadband requirements for project approval; while this high standard of broadband may be what rural areas should expect, such standards will in practice exclude poor rural projects from receiving consideration and assistance because the broadband is in fact not up to this standard.[16]

Barrier and Burden Reduction

In light of the severe economic distress in persistent poverty areas, federal government programs should remove barriers to access to federal resources for investment in these areas.

The following are a few examples of barriers that disproportionately limit persistent poverty areas' access to federal resources. These barriers include, but are not limited to, eligibility formulas, local matches, and the reimbursement model of disbursing funding. A more exhaustive list can be found in PRT's brief, Federal Policy Priorities: Transforming Areas of Persistent Poverty into Persistent Prosperity.[17]

- Use the Area Median Income (AMI) for all nonmetropolitan areas in the country as an option to determine income limits in addition to the AMI for the state in which a nonmetro county is located. Making this adjustment will increase the participation and access to resources for individuals living in rural communities in which the state has low, or depressed wages. Under the current use of AMI to determine eligibility for federal programs, the benefits distribution is uneven. While this program works well in cities with a range of incomes, in communities where economies and housing markets are inefficient and where more than 20 percent of the residents live in poverty, the average income is often depressed. A smaller percentage of residents – not just a smaller absolute number of residents – are eligible for federal programs in these non-metropolitan counties. Under the current formula, in urban areas, 30.4% of the population qualifies as "low-income" whereas in rural areas only 16.3% of the population does.[18]

  A good recent example of this solution -- the use of AMI for all non-metro areas in the country, rather than just the state -- is included in the American Rescue Plan's Homeowner Assistance Fund. In creating the Homeowner Assistance Fund, Congress provided that states must target "homeowners having incomes equal to or less than 100 percent of the area median income for their household *size or equal to or less than 100 percent of the median income for the United States*, as determined by the Secretary of Housing and Urban Development, *whichever is greater*."[19] (emphasis added).

- Waive local government matches for certain federal community development funding sources to increase their reach to persistent poverty areas. The issue of matching federal dollars is a problem in typical times for persistent poverty areas, and a near impossibility in the current climate of recovering from COVID-19 and natural disasters. Programs like HUD's HOME Program and USDA's Rural Development programs are used widely in persistent poverty regions and will be the type of program stymied by lack of matching dollars. Without a waiver, it is often be difficult to deploy these investments in exactly the type of place that needs it the most.

  A recent example, which could be replicated in other program areas and made permanent for persistent poverty areas, is the recent White House memorandum waiving the 25% non-federal match for FEMA Disaster Relief.[20]

- Move away from the reimbursement model of deploying assistance. As noted by PRT member, RCAC, in their comment to this process: "smaller communities or nonprofit organizations often have limited financial resources to pay upfront costs and must wait to be reimbursed by the federal government, even after the awards and the work plans have all been approved. The state and federal government often wants and needs nonprofit organizations to partner with them, however, the method of receiving the funds is often challenging and roadblocks exist. This leads to difficulties in small rural communities or organizations to cash flow the projects upfront and wait to get reimbursed. Most nonprofits do not have the cash flow to use, and operations can become a problem for partnering agencies."[21] The same challenges exist for smaller local governments in persistently impoverished regions. When a disaster strikes or the opportunity for a capital project comes along, there is often not extra cash flow to outlay in order to then seek reimbursement. Unfortunately, many federal relief aid and other resources are structured to be disbursed on a reimbursement basis.

This reimbursement model favors well-resourced local governments and institutions, and may lead to disparate distribution of resources, particularly along rural, communities of color. As just one example, under the CARES Act Coronavirus Relief Fund, some states used their discretion to distribute local government aid on a reimbursement basis. Analysis of data in access to these funds in the state of Louisiana demonstrates the resulting disparity: Majority people of color parishes that are also rural and areas of persistent poverty received only a third (31%) of the funding allocated, where as their white counterparts received 74%. In dollar amounts, rural, persistent poverty, majority people of color parishes only received 6.9% of similarly situated white counties.[22] Similar challenges in accessing founds due to the reimbursement model occurred in Alabama's Black Belt[23] and in Texas.[24]

A recent good example of addressing this inequity is in the U.S. Treasury's Interim Final Rule for the deployment of the Coronavirus State and Local Government Relief Funds authorized by the American Rescue Plan. In the guidance for States' distribution of these funds to non-entitlement jurisdictions, it specifically prohibits the use of the reimbursement model.[25]

Financial Assistance

CDFIs are critical conduits to ensure federally-funded financial assistance and capital reach persistent poverty communities.

Across various forms of capital resources, such as small business and mortgage loans, to community development financing, such as Low Income Tax Credits or New Market Tax Credits, or funding for water, broadband, and other infrastructure, CDFIs are well-positioned to ensure these resources can reach and be structured to benefit persistent poverty communities. Effective resource flow, even though CDFIs, requires both products structured to meet the needs of people, businesses, and institutions in persistent poverty communities, as well as addressing barriers mentioned in previous section.

Below are some non-exhaustive examples of improving the equitable distribution of federal financial assistance through effective partnerships with CDFIs with a proven track-record of serving and reaching persistent poverty communities.

- Fannie Mae and Freddie Mac should expand affordable homeownership and rental housing in persistent poverty areas. Duty to Serve is intended to drive Fannie Mae and Freddie Mac (the Enterprises) to serve geographies and people who the conventional mortgage market does not serve well. FHFA should ensure that that Enterprises serve persistent poverty areas as part of the Duty to Serve plans. This includes, but is not limited to, creating a CDFI-preferred mortgage product that allows for exceptions to income limits and more flexible credit requirements; creation of a single-delivery platform or a broker network across all persistent poverty regions through entities, such as members of Partners for Rural Transformation, which are approved seller/servicers to the Enterprises; and make eligible "equity like" investments in qualifying regional CDFIs that serve these areas.

- Increase funding for down payment assistance and preservation programs that expand homeownership opportunities for low- and moderate-income households in persistent poverty communities, particularly rural and communities of color. In addition to making funds available for these purposes, ensure the funding can be accessed and deployed by CDFIs to reach these hard to serve areas. As one example of a successful downpayment assistance program, between 2019 and 2020, through a NeighborWorks-funded down payment assistance program conducted in partnership with Wells Fargo, called NeighborhoodLIFT, PRT member HOPE provided down payment grants of up to $10,000 to 257 Mississippians, a quarter of which were in rural communities.

- Increase federal grant-based funding for critical infrastructure, such as expanded broadband and upgraded and expanded water and wastewater infrastructure. Even before COVID, affordable high-speed internet was rural communities' lifeline to basic needs, such as education or online bill paying. For rural small businesses it is their connection to access to national and international markets. [26] Water and wastewater systems in rural communities were struggling financially before COVID, which has worsened since then. Built in the 1950s and 1960s, these rural utilities are in dire need of repair, maintenance and upgrades. During COVID, most states halted water shut offs for non-payment, because washing hands is an essential preventative health measure. A May 2020 Rural Community Assistance Partnership national survey of water systems showed that more than 31% of systems surveyed said they could not continue to cover all costs for more than six months under current conditions. Current debt-based federal financing tools are simply not an option for systems that struggle with cash flow. To effectively expand critical lifelines to persistent poverty areas, federal funding, particularly through the U.S. Department of Agriculture, should be increased, with more grants than debt for operating support and infrastructure investments.

- Increase capital to CDFIs that serve persistent poverty areas. CDFIs that serve persistent poverty communities are involved at every rung of the economic mobility ladder. This includes access to basic financial services, such as a bank account and financial education; providing capital for future wealth building through homeownership and small business owners; and providing financing for critical community infrastructure, such as affordable housing, hospitals, healthy food systems and nonprofit organizations. Increasing federal funding in the form of grants to support CDFIs that serve persistent poverty areas is a critical part of the strategy to increase economic vitality and opportunity in these communities. Increased grant funding to to support the CDFI activities leads to job creation through small business lending, investments in local communities, financial education, wealth and stability creation, and access to fair credit options.

  Additionally, state, local, and federal program administrators of federal funding should allow CDFIs administer programs directly, and to utilize the funding as capital to increase lending capacity, volume, and impact to underserved regions. A good, but not exclusive example, of this is the original State Small Business Credit Initiative program, where several states contracted with CDFIs to administer the portions of the fund directly and retain the funds as capital at the program's conclusion.[27] Similar structures may be possible to replicate in other contexts, such as funding for down payment assistance, capital projects, or infrastructure.

Stakeholder and Community Engagement

Meaningful engagement in persistent poverty areas requires ensuring a diversity of voices, building trusted relationships. CDFIs can be helpful in meeting these goals.

As noted in the comments by PRT member RCAC, "Rural looks different in different parts of the country, so ensuring representative voices from rural Appalachia, the Black Belt in the Southeast, the desert Southwest, the Mountain West, the rural Northeast, Indian Country, and the great plains are included in the conversation is necessary to get a true picture of the impact of a proposed policy on rural areas. The diversity of rural places in this country necessitates a broader range of stakeholders than are traditionally invited to participate to truly get a holistic rural perspective… Rural wellbeing should be supported through socially and culturally- appropriate outreach, flexible grant funding programs, and must be paralleled with technical assistance from local, trusted, and regional intermediaries who will provide meaningful engagement to meet the community's needs."[28]

CDFIs with a strong track record in serving persistent poverty communities are rooted in deep, meaningful relationships with people in the communities they serve. This includes not only individuals receiving financial services or counseling, but also community leaders, local government officials, leaders of state governmental agencies, and others. They also carry knowledge and history of the region, including lessons learned from previous challenges or successes in deployment of federal resources.

As such, federal government agencies seeking to ensure equitable deployment of resources in these communities, should look to CDFIs as an priority stakeholder. This outreach and engagement should be both on the front-end input of program designed and structure, as well as a conduit for outreach and technical assistance to ensure historically excluded communities can actually access the resources. Partners for Rural Transformation, collectively or its individual members, are a good resource to begin this outreach inquiry across federal programs and funding streams.

[1] Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, Jan. 21, 2021, https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/

[2] CDFI Fund, " Persistent Poverty Counties (PPCs) (2011-2015 ACS and Island Areas Decennial Census)," 2019, available at https://www.cdfifund.gov/sites/cdfi/files/2021-05/12_FY21_CDFI_NACA_Persistent_Poverty_Counties_2011_2015_ACS_and_Island_Areas_Decennial_Census.xlsx

[3] Transforming Persistent Poverty in America: How Community Development Financial Institutions Drive Economic Opportunity. Partners for Rural Transformation. November 2019, available at https://www.ruraltransformation.org/wp-content/uploads/2020/03/Transforming_Persistent_Poverty_in_America_-_Policy-Paper-PRT-_FINAL.pdf

[4] Schlegel, Ryan and Stephanie Peng. As the South Grows: Strong Roots. National Committee for Responsive Philanthropy and Grantmakers for Southern Progress. June 27, 2017.

[5] Bank Investment Falls Short in Rural Areas. Opportunity Finance Network. 2020.

[6] Federal Investment in Rural America Falls Behind. W.K. Kellogg Foundation. 2004.

[7] CDFI Fund, " Persistent Poverty Counties (PPCs) (2011-2015 ACS and Island Areas Decennial Census)," 2019, available at https://www.cdfifund.gov/sites/cdfi/files/2021-05/12_FY21_CDFI_NACA_Persistent_Poverty_Counties_2011_2015_ACS_and_Island_Areas_Decennial_Census.xlsx

[8] Consolidated Appropriations Act, 2021, PL 116-260, Dec. 27, 2020, 134 Stat 1182 (Defining "persistent poverty counties" as "any county that has had 20 percent or more of its population living in poverty over the past 30 years, as measured by the 1990 and 2000 decennial census, and the 2007 – 2011 and 2014 – 2018 American Community Survey 5-year average.").

[9] Committee Report for appropriations for financial services and general government for the fiscal year ending September 30, 2021, Oct. 26, 2020.

[10] Consolidated Appropriations Act, 2021, PL 116-260, Dec. 27, 2020, 134 Stat 1182 ("to support the efforts of low- and moderate-income community financial institutions to, among other things, provide loans, grants, and forbearance for small businesses, minority-owned businesses, and consumers, especially in low-income and **underserved communities, including persistent poverty counties,** that may be disproportionately impacted by the economic effects of the COVID-19 pandemic.") (emphasis added).

[11] U.S. Treasury, Emergency Capital Investment Program, "Rate Reduction Incentive Guidelines," Mar. 4, 2021, https://home.treasury.gov/system/files/136/Rate-Reduction-Incentive-Guidelines.pdf

[12] 7 C.F.R. § 1942.30

[13] 7 U.S.C.A. § 2008c

[14] Committee Report for Agriculture, Rural Development, and Food and Drug Administration, Oct. 26, 2020.

[15] Fahe, Comments to the U.S. Census Bureau, "Soliciting Feedback from Users on 2020 Census Data Products," Docket ID 180608532-8841-02, Nov. 2018.

[16] See for example, Section J, Enhanced Broadband Access, FHLB Atlanta Affordable Housing Program Implementation Plan, http://corp.fhlbatl.com/files/documents/ahp-implementation-plan.pdf, Pages 29, 36

[17] Partners for Rural Transformation, "Federal Policy Priorities: Transforming Areas of Persistent Poverty into Persistent Prosperity," Oct. 2020, https://www.ruraltransformation.org/wp-content/uploads/2020/10/PRT-Federal-Policy-Priorities-October-2020.pdf

[18] Fahe, "Fahe Public Policy Positions: Rural Income Limits Fairness," https://fahe.org/fahe-public-policy-positions-rural-income-limits-fairness/

[19] Homeowner Assistance Fund, Sec. 3206 of the American Rescue Plan Act of 2021.

[20] White House, "Memorandum on Maximizing Assistance from the Federal Emergency Management Agency," Feb. 2, 2021, https://www.whitehouse.gov/briefing-room/presidential-actions/2021/02/02/memorandum-maximizing-assistance-from-the-federal-emergency-management-agency/

[21] RCAC, Comment to Office of Management and Budget, "Methods and Leading Practices for Advancing Equity and Support for Underserved Communities through Government," July 6, 2021.

[22] Calandra Davis and Georgia Barlow, "Racial Inequities in the Distribution of Louisiana's Coronavirus Relief Funds: A Report for Communities Leaders," April 16, 2021, http://hopepolicy.org/manage/wp-content/uploads/LA-CARES-Act-brief-Updated.pdf

[23] Oscar Perry Abello, "Alabama's Black Belt Figured Out Zero-Interest Local Government Financing," Next City, Oct. 22, 2020, https://nextcity.org/daily/entry/alabamas-black-belt-figured-out-zero-interest-local-government-financing

[24] Texas Housers, “Texas struggles to streamline CARES funds as local governments scrape for resources,” Dec. 23, 2020, https://texashousers.org/2020/12/23/texas-cares-funds-struggles/

[25] U.S. Dep’t of Treasury, Interim Final Rule, “Coronavirus State and Local Fiscal Recovery Funds,” Federal Register, Vol. 86, No. 93, at page 26814, May 17, 2021, available at https://www.govinfo.gov/content/pkg/FR-2021-05-17/pdf/2021-10283.pdf. See also, Alabama Black Belt Community Foundation and Hope Policy Institute, Press Release, “Our Leaders Must Understand the Realities of Small, Rural Communities to Ensure Pandemic Relief Funds Are Distributed Equitably,” June 23, 2021, http://hopepolicy.org/blog/our-leaders-must-understand-the-realities-of-small-rural-communities-to-ensure-pandemic-relief-funds-are-distributed-equitably/ (stating that “Too often, systems of oppression have been normalized so deeply that we don’t even recognize it and the necessary considerations of access and equity are not given their due attention. The use of the reimbursement model to distribute relief aid is a prime example.”).

[26] For further recommendations related to broadband, see Fahe Policy Position Paper on Broadband, https://fahe.org/wp-content/uploads/Fahe-Public-Policy-Position-Broadband.pdf

[27] U.S. Dep’t of Treasury, “Best Practices from Participating States: Partnering with Community Development Financial Institutions (CDFIs),” Feb. 2015, https://www.treasury.gov/resource-center/sb-programs/Documents/SSBCI%20CDFI%20Paper%202-27-15%20-%20final.pdf

[28] RCAC, Comment to Office of Management and Budget, “Methods and Leading Practices for Advancing Equity and Support for Underserved Communities through Government,” July 6, 2021.