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Lessons for Increasing Inclusivity and Equity in Local Spending

A Look at How Three Metropolitan Regions are Prioritizing and Allocating COVID-19 Recovery Funds

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Local governments throughout the nation have received unprecedented levels of flexible federal funding to respond to the COVID-19 crisis (Boddupalli et al. 2021). Although past research suggests that inclusive decisionmaking processes can help local governments achieve an equitable and inclusive recovery from economic distress (Poethig et al. 2018), little is known about whether and how federal spending during prior recessions was allocated at the local level and how inclusive those processes were (Boddupalli et al. 2021). As a result, local leaders today have little guidance from the past on how to allocate federal resources in an inclusive and equitable manner.

To fill this gap, this report describes and assesses the process for deciding upon the use of early COVID-19 recovery funds (focused predominantly on the American Rescue Plan Act, or ARPA) in three metropolitan regions: Memphis, TN; Rochester, NY; and Chicago, IL. We compare the methods used by each region to best practices from the literature to identify how local governments throughout the nation could increase inclusivity for future spending decisions. To do so, we conduct a series of interviews with stakeholders in each region who have a role in the allocation of federal recovery funds, those who sought federal recovery funding for their initiatives, and community leaders that represent and serve historically excluded populations such as residents with low incomes and people of color.

We find that each region embodied strengths and weaknesses in its processes:

- The City of Rochester and Monroe County followed different paths for the allocation of their federal recovery funds, with intentional but inconsistent patterns of community engagement and equity considerations across both. Each jurisdiction made efforts to utilize equitable processes and center resident priorities, but neither fully followed best practices to carry out these plans. While the resulting allocations for each jurisdiction feature substantive community development projects, greater collaboration between the two could have enhanced the strength and inclusivity of the processes used to arrive at these investments.

- Both the **City of Memphis** and **Shelby County** conducted a top-down approach to allocating federal recovery dollars, getting the money out quickly but without a robust community engagement strategy or equitable allocation process. Much of the funding was allocated to filling in operational budget gaps and public safety. Although some funds were allocated to community development and pressing community needs, the process by which the recipients were determined was not always transparent, and there were no written RFPs or clear selection criteria. The limited money that did go toward equity goals was focused on evidence-based initiatives, but this often resulted in money going to larger, more established organizations.
- The **City of Chicago** conducted extensive outreach to community-based organizations but little direct outreach to community members, while **Cook County** took a more intensive approach to individual level engagement. Cook County also utilized equity tools for decisionmaking such as requiring policy staff submitting project proposals to identify the equity implications of their submissions and using an equity scoring rubric to evaluate ideas for ARPA funds.

We conclude the report with recommendations that local leaders across the country could take to increase equity and inclusion in future allocation decisions. The recommendations, while rooted in each local context, are broadly applicable to municipalities seeking to build on the successes of other municipalities and learn from their challenges.

Best Practices for Inclusive and Equitable Decisionmaking

Making allocation decisions that lead to equitable outcomes and are in line with community goals requires a focus on (1) community engagement, (2) using data and evidence to understand needs and inequities, and (3) considering the equity implications for investments both in evaluating proposals and in monitoring investments after they are made. As such, we assess our three case study cities according to these three categories of best practice based upon a review of the literature.[1]

Community Engagement

Community engagement is a cornerstone of inclusive decisionmaking. Efforts like participatory budgeting and community roundtables can offer valuable forums for policymakers and decisionmakers to solicit public feedback to inform priorities and policy implementation. However, community engagement is only as inclusive as the people in the room. If community engagement includes a disproportionate number of residents with high incomes or residents who are non-Latine white people—demographics which research shows are disproportionately represented in some types of public meetings (Einstein, Palmer, and Glick 2018)—then community engagement will only serve to reinforce inequities. Therefore, leaders must be intentional about engaging a range of community members to develop a comprehensive understanding of different community needs, and they must engage community members as active partners and collaborators in decisionmaking.

Key best practices from the literature on how to ensure that community engagement is inclusive and equitable include the following:

- Invest in continual community outreach at all times to build trust and understanding of community needs, especially within neighborhoods and among people who have been historically disengaged or marginalized in public processes (Holley 2016). This helps ensure a solid foundation is in place when key decisions are needed.
- Create several modes for community members to offer input—such as in-person and virtual forums and in person and online surveys—and accommodating different schedules (i.e., offering meetings at multiple times and days), caretaking responsibilities (e.g., providing childcare at meetings), abilities (e.g., having sign language interpreters or closed captioning at events), language abilities (i.e., providing materials in multiple languages per major community languages), and cultural considerations (e.g., offering kosher or halal foods).[2]
- Clearly communicate to community members the opportunities to offer input on priorities, needs, and preferences in policy and program decisions, and set expectations about how their input will inform final recommendations.[3]
- Engage with community organizations and networks (such as faith groups, schools, and nonprofits) to reach historically excluded communities while being sure to reach out to smaller or less frequently engaged community organizations to bring a range of perspectives to discourse (Institute for Local Government 2015).
- When possible and appropriate, pay community members for their time. Compensating community members is an important way to remove the financial barriers that may otherwise make it difficult for lower-income community members or hourly workers to participate while also demonstrating the value of their contributions to the work. This can take different forms, from paying people to complete surveys to funding community organizations (Shakesprere et al. 2021). Although paying everyone who engages in every meeting or outreach effort is not always feasible, paying historically excluded community members to sit on advisory boards or equity cabinets should always be done. Lived experience must be valued as much as other types of expertise.

Using Data and Evidence for Understanding Needs and Inequities

Although inclusive community engagement is necessary, it is not the only component of creating equitable and inclusive policies and programs. Local leaders should also use data and evidence to understand needs and priorities of community members, particularly those who have been affected by institutional racism and injustice. And they should bring community members and people with lived experience into this analysis and application of data to ensure a robust understanding of the varying needs and priorities.

Best practices from the literature on how to use data and evidence to understand needs include the following:

- Use quantitative and qualitative data to shape their understanding of a given policy issue. Data used to inform policies and budgets should be timely and disaggregated by race and place and should be developed and used in collaboration with community members and advocates (Hendey and Pettit 2021).
- Consider who is not reflected in quantitative data and develop strategies to fill data gaps, such as through targeted community meetings and engagement with community groups who are well-connected to the needs of the communities/populations they serve. Data gaps can impede thorough understandings of the experiences and needs of people of different demographics who may be undercounted in data, such as women, nonbinary people, transgender people, Black people, Latine people, and people with disabilities (Center for American Progress 2012; Holtzman et al. 2022; Kimata 2020; Treadwell et al. 2019).

Considering Equity Implications of Decisions

Along with robust community engagement and the use of data to understand needs, local leaders must also consider the equity implications of individual decisions. For instance, when selecting between multiple allocation options, leaders should consider who would benefit from each type of investment, who may be harmed, and who may be left out. Decisions that center groups already experiencing disparities, and prioritizing them as beneficiaries, lead to more equitable outcomes.

Best practices from the literature on how to ensure that equity is a core consideration of each decision include the following:

- Develop equity guidelines for investments and compare proposals across a standard set of benchmarks. For instance, the W.K. Kellogg Foundation's Racial Equity 2030 program used four criteria with varying point qualifiers on a five-point scale and made the rubric public for grant applicants to reference.[4] The Bread for the World Institute's Racial Equity Scorecard offers a six-point scale for evaluating policies and programs, with the lowest possible score for programs that actively harm communities of color, middle scores for broad-based policies that are race neutral or do not actively address resources for racial inequities, and high scores for programs that prioritize racial equity and account for historical trauma (Gamblin 2020).

- Focus on inclusive design processes, implementation, eligibility and access, and outcomes when evaluating programs for equity. Develop equity scoring guidelines that account for who was at the decisionmaking table and who would have access to the program being evaluated, and whether that program would improve net or relative outcomes for priority groups, such as closing access gaps or reducing disparities (Ashley et al. 2022).

BOX 1

A Note about Language and terms Employed in This Paper

The pandemic hit low-income and communities of color disproportionately hard. Black, Latine, and Native American communities saw higher rates of death caused by COVID-19.[a] And people who identify as Black, Latine, Native, and Asian saw higher unemployment rates in 2020 and were slower to rebound in 2021 than people who identify as white.[b]

This disproportionate economic and health impact is not a coincidence but rather a result of structural racism across many institutions and systems within the United States. Structural racism comprises a wide array of institutional, cultural, and interpersonal dynamics, such as redlining and employment discrimination, that reinforce racial inequity and have led to generations of disinvestment in communities of color.

In discussing these communities, we chose not to use the commonly used terms "vulnerable" or "disinvested" because these terms do not fully capture centuries of policymaking and planning intentionally designed to exclude and oppress. A more precise term would be "those affected by generations of structural racism and disinvestment and hardest hit by the pandemic." However, throughout this report we use the term "historically excluded residents" as a shorthand. Some people hardest hit by the pandemic were not the ones who faced the greatest disparities before the pandemic, leading to tensions in funding. This is one reason why defining these terms and setting clear guidelines is critical for local leaders.

[a] We recognize that language evolves, and we strive to be inclusive in our work. Thus, we have adopted "Latine" as a more gender-neutral term to reference people of Latin American heritage, with the exception of quotes and proper nouns such as organization names. To read more about this term, see Evan Crochet, "Let's Nix Latinx: Latine Is the Word You Were Already Looking For," The Diversity Movement, January 18, 2022, https://thediversitymovement.com/nix-latinx-latine-is-word-you-were-looking-for/. See also Latoya Hill and Samantha Artiga, "COVID-19 Cases and Deaths by Race/Ethnicity: Current Data and Changes Over Time" (San Francisco: Kaiser Family Foundation, 2022), https://www.kff.org/coronavirus-covid-19/issue-brief/covid-19-cases-and-deaths-by-race-ethnicity-current-data-and-changes-over-time/.

[b] Racial Disparities in Unemployment during the COVID-19 Pandemic and Recovery (Prepared for the Federal Reserve Bank of Boston's 64th Economic Conference, "Racial Disparities in Today's Economy" October 4-6, 2021).

Case Studies

Rochester, New York: Disjointed Process, Disjointed Results

The first metropolitan region we studied was Rochester, NY. In the City of Rochester, 30 percent of residents have income below the federal poverty level, and the median household income of $37,395 sits well below the national average.[5] Monroe County fares better on these metrics, but its percentage of people with income below the federal poverty level is still 10 percent higher than the current rate in the United States.[6] The loss of major employers like Kodak, Xerox, and Bausch + Lomb[7] over the past several decades has drastically affected the area's economy, with population loss and urban decay exacerbating pre-existing inequities in job quality (Atteridge and Strambo 2021). Wage disparities by ethnicity and gender are stark in Rochester, with Black or Latine residents earning less than white residents in nearly every industry regardless of education levels (Doucette and Fitts 2021). These disparities contributed to the results of a 2016 study that ranked Rochester 241st out of 274 cities on overall inclusion, 236th on economic inclusion, and 223rd on racial inclusion.[8]

Federal recovery funds present a tremendous opportunity for local governments in the region to address deep-set poverty and inequity in the Rochester area, but our analysis found that a lack of preestablished institutional processes for equitable public spending, inconsistent collaboration across jurisdictions, and entrenched distrust amongst residents constrains efforts to promote a fully inclusive recovery from the COVID-19 pandemic. Although local governments in the region have taken intentional steps to incorporate community priorities in their ongoing plans for public funds, mechanisms for embedding equity and inclusion in these government processes are still underdeveloped. Collaborating more substantively with community organizations to reach those hit hardest by the pandemic, weighting public survey responses to be representative of current jurisdiction demographics, and engaging in stronger coordination between jurisdictions are practices that could have enabled the City and County's federal recovery allocation processes to be more inclusive, but institutional changes, such as forming permanent community advisory boards, formalizing equity budgeting tools, establishing Chief Equity Officer positions, and committing to existing cross-jurisdictional equity initiatives could embed equitable practices for all future processes. Given the deep disparities present in Rochester and the area's history of public distrust, intensive measures are likely needed to meaningfully address these long-standing challenges.

WHAT DID THE PROCESS LOOK LIKE?

Following the passage of the American Rescue Plan Act (ARPA) in March 2021, the City of Rochester[9] and Monroe County[10] received a combined total of over $346 million federal recovery dollars. Although each jurisdiction acknowledged the unprecedented scale of the investment and its potential for substantive impact, the City and the County's processes for allocating their federal recovery dollars were largely disjointed and uncoordinated. While the County conducted a more well-rounded and in-depth community engagement process than the City, interviewees noted a lack of transparency following outreach efforts as the County determined how to allocate its recovery funds. The City employed stronger equity mechanisms within its allocation process through its use of a budget equity tool and an ARPA spending dashboard, but its community engagement methods were limited. Both jurisdictions demonstrated strengths and weaknesses within these processes that could have been strengthened in a variety of ways.

Kicking off the process in the summer of 2021, the City of Rochester began its ARPA-centered community outreach efforts several months before Monroe County. Throughout June 2021, residents were given the opportunity to provide input on ARPA spending through one community input session, one telephone town hall, and an online survey. In total, over 4,700 residents were engaged through the latter two methods. The online survey captured over 1,183 of these participants, whose responses were disaggregated by age and city residency. Responses from city residents, which accounted for 70 percent of online survey responses, were then broken down by residency within the five main areas of the city (City of Rochester, New York 2021b).

In July of 2021, the Mayor's Office released a Community Input Report distilling key themes, survey results, and quotes from these engagements. Using these inputs as "a guide," the Mayor's Office then published the Strategic Equity and Recovery Plan (SERP) in September of 2021.[11] Organized by the six initiative areas outlined in "Rochester 2034," a 30-year comprehensive plan adopted by the Rochester City Council in 2019, the SERP details almost 40 key programs and focus areas for ARPA investments that total the city's allocated $202.1 million (City of Rochester, New York 2021a). Although the announcement of former Mayor Warren's resignation less than a month after the Recovery Plan's release cast doubt on how closely the incoming administration would follow it, the City Council approved allocations for many of its major programs as the Mayor's Office transitioned administrations. In May of 2022, recently elected Mayor Malik Evans announced that his staff would review the $130 million ARPA dollars the City Council had already allocated to ensure these projects could be completed in a timely manner. Mayor Evans also indicated in May that the city was speaking with Monroe County to align their investments and maximize their impact, although by this point the county had not released any spending plans.[12] The Mayor's Office has not yet publicized any reallocations of ARPA dollars or released alternate federal recovery spending plans, and the city is moving forward in releasing individual requests for proposals (RFPs) for several of the Recovery Plan's previously approved programs.

Taking a slower and more open-ended approach, Monroe County began developing plans for its $144 million ARPA award in August of 2021 by distilling 12 existing government and community reports into six key focus areas to create the "Bring Monroe Back Recovery Agenda." The county conducted community engagement activities from October through December of 2021 that included distributing a community-wide survey, requesting testimony from community organizations, and hosting in-person and virtual community forums (Monroe County 2021). The county held three in-person forums and one virtual meeting where citizens were able to learn about ARPA funds and share their thoughts on spending priorities. Additional follow-up meetings with specific stakeholders rounded out the county's engagement efforts. In total, the county engaged over 3,600 residents through these outreach methods (Monroe County 2022a)

Although the county stated in its timeline that it would use this input to "develop a detailed Bring Monroe Back plan," no such document was produced before the county released its ARPA RFP in June of 2022. Rather, the county published three reports roughly within that same time frame, with the first in July of 2021 outlining its plans for community engagement, the second in January of 2022 reporting out results of the engagements, and the third in July of 2022 providing details for the county's ARPA RFP process.[13] In its January report, the county announced three high-priority areas it derived from the previous community outreach efforts and the three goals the county would seek to accomplish through its upcoming RFP process. The county also identified six metrics it planned to use to quantitatively determine through reporting requirements whether ARPA investments were successful (Monroe County 2022b). Almost three months after closing applications, the county released its list of successful proposals in late September 2021. Almost $99 million of the county's $144 million ARPA award will be spent through these proposed projects, and it is still unclear how the remaining $45 million will be allocated.[14] The county did not respond to any requests for information throughout the drafting of this brief.

HOW WELL DID ROCHESTER ADHERE TO BEST PRACTICES?

Community Engagement

While the City and County each conducted some form of community engagement to determine priorities for ARPA spending, interviewees reported that political constraints and entrenched distrust amongst residents inhibited the inclusivity of these efforts. And although both jurisdictions attempted and succeeded to follow community engagement best practices to some degree, the disjointed nature of their processes is reflected in the uneven application of these practices across engagement activities. Community leaders we interviewed in Rochester described the closed-off nature of these government bodies, with one interviewee noting the "bunker mentality" that besets the institutions in the community. Greater collaboration between the City and County as well as deeper engagement with community organizations with close ties to residents likely would have enabled both jurisdictions to more closely adhere to best practices and smoothed roadblocks in their efforts to build trust amongst residents. As it stands, each jurisdiction undertook similar but largely uncoordinated approaches to community engagement.

Equity initiatives, reports, and action plans abound in the Rochester area, providing a robust supply of stakeholder-informed assessments for local governments to draw upon when creating spending plans. Both Monroe County and the City of Rochester used existing reports as foundations for their ARPA spending plans, but the City in particular aligned its spending heavily with the priorities laid out in the 2019 Rochester34 Comprehensive Plan (City of Rochester, New York 2019a).

Rochester34's community engagement process was substantial and followed many best practices. Throughout its year-long outreach process, the team behind Rochester34 offered residents several methods of providing input and worked with local community organizations to provide these opportunities in locations that would more likely reach historically under-engaged the residents (City of Rochester, 2019b). In part because of these efforts, the City of Rochester relied on Rochester34 as a guiding framework for its ARPA spending plans. The Strategic Equity and Recovery Plan's inventory of proposed ARPA-funded projects is categorized by Rochester34's six initiative areas, with each item including a provision identifying its connection to the goals of Rochester34.

"We had a platform to jump from because, as a community, we had already gotten in the trenches with one another and rolled up our sleeves about what's important." —Rochester City interviewee

The development of the City's Recovery Plan featured considerably less community engagement than that of Rochester34. Rather than hosting meetings with neighborhood, stakeholder, and community groups, the City of Rochester offered three remote activities over the span of just one month to gather resident input as to how to spend the city's ARPA funds. The telephone town hall was the most successful of these outreach methods, gathering responses from 3,558 residents. The City did not release data on how many attended its online forum, while the online survey captured 1,183 responses (City of Rochester 2021b). Although the prompt publication of the Community Input Report and its inclusion of direct quotes from residents provided a degree of meaningful follow-up to those who participated, the short time frame in which engagement opportunities were offered and the lack of in-person or targeted outreach methods casts doubt on the inclusivity of these methods.

Recent controversies in Rochester also likely harmed what efforts were made to gather community input. In March of 2020, Mayor Warren's administration was embroiled in a scandal after being accused of participating in a cover-up of the death of Daniel Prude, a Black man who died shortly after Rochester police pinned him to the ground and placed a hood over his head as they took him into custody.[15] Less than a year later, Rochester's then-current Mayor Warren faced charges for violating finance, campaign, gun, and child-endangerment laws, ultimately leading her to agree to resign as part of a plea deal in October of 2021.[16] Although the City of Rochester invested heavily in resident outreach efforts through Rochester34 and other community planning initiatives before the pandemic, it is difficult to determine the degree to which these controversies and engrained political conditions damaged municipal efforts to build trust with community members and gather meaningful input for ARPA priorities.

"I think the challenge is that we have a community that—again, because of this kind of long-standing economic malaise, paired with a history of inequity in particularly the racial inequity, that's left a lot of people very cynical about participating in the civic space... part of it is probably a lack of information and resources to really get the word out. But I think it's equally true that folks are not particularly convinced that their participation will actually have a meaningful impact, and subsequently, they do not participate."—Rochester Community Interviewee

Given the challenges posed by these circumstances, several city staff involved in the development of the Recovery Plan expressed pride in what they were able to accomplish. One city leader noted, “I'm proud of what we did in Rochester—while it is flawed, it is the best attempt at getting community input prior to spending the dollars or allocating the dollars. It was the best effort that a small city could undertake given the circumstances.” However, others working closely with the City maintained that, despite their best efforts, the project teams behind Rochester34 and the Recovery Plan conducted “in-reach” rather than outreach. Citing the focus on homeowners within the Recovery Plan’s housing recommendations and its virtual outreach methods, one interviewee described the plan’s engagement process as a middle-class process creating middle-class solutions.

“Especially when we're talking about limited internet access, then our community, we're just really not at the table. And so in my opinion, we have created a middle-class process and coming up with middle-class solutions to poverty-level problems, which is why we never move.”—Rochester City and community interviewee

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Others close to the city expressed disappointment that Rochester34’s heavy influence on the Recovery Plan seemingly came at the expense of the inclusion of other community plans. In particular, the Racial and Structural Equity (RASE) Report, released by a joint commission of the City and the County in March of 2021, has few footprints in the city’s Recovery Plan.[17] Only one data recommendation from the report made it into the Recovery Plan, calling for an expansion of the Rochester Police Department’s data governance systems (City of Rochester, New York 2021a).

Although Monroe County is deploying its ARPA dollars at a slower pace, it conducted its community engagement process with a more intensive equity lens. Instead of basing the majority of its recommendations on one plan as the City did with Rochester34, the County took 12 reports into consideration when developing its six focus areas for ARPA spending. According to the County’s Bring Monroe Back webpage, each of the twelve reports were “supported directly by community feedback” and informed by “research and testimony of subject matter experts.” This initial synthesis included the 2021 RASE Report, as well as ROC the Future’s 2020 Report Card, the Rochester-Monroe Anti-Poverty Initiative’s Community Concerns Assessment, and others.[18]

The County also provided residents more opportunities over a longer period to inform ARPA priorities through a variety of in-person and virtual engagement activities. Residents and community organizations were invited to provide input through a public survey, which collected the race, age, and gender of its respondents. Although the survey offered limited options to identify potential solutions to challenges, respondents could contribute more detailed responses through the County’s four public feedback sessions as well as through long-form testimonies. County officials also conducted “pop-in outreach" by attending preexisting meetings, events, and forums to target engagement with twelve communities it identified as underserved (Monroe County 2022a).

Additionally, Monroe County made efforts to provide access to virtual and physical engagement materials in a variety of languages, host forums throughout different parts of Monroe County, and offer both afternoon and evening meeting options. The County's January 2022 Quarterly Report synthesized inputs gathered from these engagements and reported the feedback to the community less than a month after the county ended its outreach process. In total, 2,817 residents responded to the public survey, 175 residents participated in the public feedback sessions, 519 were engaged through targeted outreach, and 96 written testimonies from community-based organizations, nonprofits, businesses, and individuals were submitted. Monroe County also invited stakeholders to attend three additional in-person meetings in April 2022, each focused on the County's focus areas (Monroe County 2022a).

Although the County shared a timeline at its final virtual community forum in December of 2021 promising to develop a detailed Bring Monroe Back plan by March of 2022, officials instead released an RFP for ARPA funding opportunities in early June. Upon their release, applicants had just under two months to apply for ARPA funds. Further guidance on these opportunities was released by the County in its July 2022 Quarterly Report as well as through a live Q&A session after the RFP was made public.[19]

Using Data and Evidence to Understand Needs and Inequities

Similar to the City and County's engagement efforts, the use of data to assess community priorities demonstrated an intentional but inconsistent effort across the two jurisdictions. Disaggregation and weighting of data collected through community input as well as greater transparency into how each jurisdiction used data to inform resulting spending decisions would have benefitted each of their processes.

Although the City disaggregated its online survey responses by age and city residency, at no point did it collect data on respondents' race, ethnicity, gender, or economic status. Interim guidance from the US Treasury Department permitted recipients of ARPA funds to presume that services provided in Qualified Census Tracts (QCTs) or to those living in QCTs would qualify as responsive to the disproportionate impacts of the pandemic, which the City referenced in its materials for the Recovery Plan.[20] However, this designation applies to most census tracts in Rochester. Disaggregation by neighborhood residency alone thus makes it difficult to determine whether the online survey truly captured the voices of those most affected by the pandemic, although data indicates the area of the City most heavily represented amongst respondents to the online survey is not representative of the wider Rochester population. The Southeast Quadrant, which captured 44 percent of online survey respondents, has a median household income $13,000 higher than that of the city[21] and its percentage of white residents is almost double the city's average.[22] Although these statistics indicate that white respondents were overrepresented in the city's public survey, those who reported that they were from the Southeast quadrant of the City may not be representative of the neighborhood as a whole. Directly collecting data is preferable to relying on inferred demographics from neighborhood characteristics, because the latter cannot be accurately reweighted to be representative of the city's actual racial, ethnic, or economic breakdowns.

Although Monroe County collected data on the race, age, and gender of its public survey respondents, elements of its process also could have been improved to ensure its results more accurately captured the needs of those most deeply affected by the pandemic. The January 2022 Quarterly Report shows that white respondents were slightly overrepresented within the survey compared to Monroe County's 2021 census data, while respondents who are Black or African American were heavily underrepresented (Monroe County, 2022b). The County did not reweight responses to account for these discrepancies, limiting the potential for the resulting priorities to be truly representative of its demographics. Additionally, by not collecting data on respondents' economic status and reweighting responses by combinations of race, age or gender, the County hindered its ability to understand how the intersection of these identities may have affected what respondents listed as their priorities for ARPA spending.

Both jurisdictions incorporated a mixture of qualitative and quantitative data in their assessment of community input, but it is unclear exactly how either form of data was used to determine the type or volume of ARPA expenditures beyond belonging to overarching focus areas. A lack of follow-up with those engaged through the City and County's outreach efforts or clear demonstration of how input informed recommendations may also be contributing to chronic patterns of disengagement. The City's Community Input Report and the County's January Quarterly Report disclosed the results of outreach efforts back to residents, but neither jurisdiction demonstrated the processes by which that feedback was used to craft resulting expenditures. One meaningful step the City did take was to incorporate direct quotes from the public feedback it received into its Community Input Report, although these quotes were not linked back to proposed expenditures in the Recovery Plan. Leaders of community organizations we spoke with were not sure whether or how the input they and their coalitions submitted to the City or County was utilized, because they never received any subsequent form of follow-up after their engagement.

"The County has been a little bit more mystifying. We actually have a pretty close relationship with that administration, but actions to spend ARPA funding on the broad recovery needs of children and their families weren't prioritized to the extent we had hoped."—Rochester Community Interviewee

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In using data collected through community input to determine ARPA spending, the City seemed to rely more heavily on department staff to decide which projects should be funded and who should be involved in them than on qualitative or quantitative data. The City's short timeline to submit plans for the Recovery Plan also impeded efforts to more closely analyze what data was available, as the Mayor's Office only gave the three City commissioners responsible for the Recovery Plan 30 days to submit it following the completion of community outreach efforts. According to interviewees, the City imposed this timeline to respond to community input as quickly as possible as well as incoming pleas for immediate assistance and investment. However, this internally imposed deadline likely inhibited the ability of the City to meaningfully analyze and incorporate the community input they received.

"We really relied on their [city departments] best judgment as they were proposing the programs that what they were proposing made sense with what they're seeing and was accomplishable within the constraints of the funding in addition to the overarching framework of what's important, what are the priorities for the community."—Rochester City Interviewee

Considering Equity Implications of Decisions

Both the City and the County made efforts to embed equity considerations within their review of ARPA spending decisions, either through preestablished equity mechanisms or RFP criteria, but greater collaboration between the two jurisdictions and more formalized processes would have strengthened the tools and practices each jurisdiction applied.

Each jurisdiction is using the RFP processes to determine uses for portions of their ARPA funding. In early June of 2022, Monroe County released one RFP to encompass all proposed ARPA projects. Combining the original six focus areas of the Bring Monroe Back Recovery Plan into three high-priority areas for funding consideration, the RFP allows for flexible uses of funds to support these priorities while requiring extensive considerations of equity impacts within its criteria. Proposals must detail plans to report on how ARPA-funded programming will be designed to center equity, including

- goals for how proposed programs will serve "historically underserved, marginalized, or adversely affected groups";
- information on how program officers are working to educate residents or businesses of available federal recovery resources, details on differing levels of access to program benefits;
- an internal review of administrative capacity to determine if disparities exist in the ability to complete applications or meet eligibility criteria; and
- how program outcomes will focus on closing gaps and disaggregate progress by race, ethnicity, and other relevant equity dimensions.

Additionally, the County's RFP identifies and requires respondents to take "affirmative steps" to ensure certified businesses operated by people of color, women, and labor-surplus area firms are prioritized within proposal processes.

The County also identified six metrics to quantitatively assess success at the end of the grant term's four-year period, although their ability to measure equity impacts is limited. For each of the three high-priority areas the County identified two metrics it plans to use to assess whether ARPA investments reached their intended goals, with the first being a large numerical metric to measure overall success and the second being an 'equity metric' intended to address current disparities (Monroe County 2022c). However, these metrics largely do not include race disaggregation or a focus on narrowing gaps for communities hit hardest by the pandemic.

Although Monroe County took steps to center equity implications within its RFP process, they could have benefitted from additional review from community members and experts who specialize in equity practices. Based on our interviews with community leaders, the County largely conducted its processes from behind closed doors and without external input. After assessing applications for almost three months, the County released its list of proposed recipients in late September. These projects account for $99 million of the County's $144 million award and were chosen by the Department of Planning, in conjunction with an internal review team and voting committee.[23] The County has not announced how the remainder of the funds will be allocated nor how residents may track expenditures of total awards. In contrast, the city has been publicly tracking its ARPA expenditures through a dashboard available through its webpage as well as public City Council minutes.[24]

Instead of releasing one RFP for all ARPA projects, the City of Rochester is requesting separate proposals for specific programs already identified through its Recovery Plan. The City's RFP includes some equity considerations within its evaluation criteria, primarily through the use of bonus weighting for proposals that employ state-certified "minority and women-owned businesses (MWBE)" (City of Rochester 2022). However, neither the RFPs currently available nor the Recovery Plan provide any other specific guidance for assessing the equity impacts of these investments.

Both jurisdictions also have a variety of tools and initiatives designed to embed equity implications within governmental decisionmaking. One notable equity mechanism the City has in place is its Budget Equity Tool, which was established through the Budget Equity Program launched in 2021 by former Mayor Warren. With the tool in place, City departments must convene internal committees to evaluate the equity implications of budget decisions and track the outcomes of those decisions through "benchmarks" related to race, gender, and physical and mental ability.[25] However, it is not clear what these benchmarks are or who determines them. All departments are required to submit information through the tool as part of funding proposals, but given the tool's relatively recent introduction into the City's processes, its applications to ARPA spending remains somewhat ambiguous. According to a city staff interviewee, "We are seeing in our budget equity tools that have been submitted really in the last month, we are seeing discussion there of the use of ARPA funds for some—deliberately for some equity purposes. I would say, really, it's more that the decision process is informed by the equity considerations."

Another equity initiative recently launched by the City of Rochester is the Let's Get REAL – Race, Equity, and Leadership initiative (City of Rochester, New York 2019c). In January of 2019, the REAL initiative released a charter whose stated objective was to "develop racial equity toolkits and guidelines designed to move racial equity forward through workforce evaluation and integrating a racial equity framework in everyday operations." However, according to its web page, the REAL Initiative has not progressed past the 'Identify Different Solutions' phase of its process.[26] As part of this phase, the Real Initiative promises to develop a toolkit and a power analysis of Rochester, although neither is currently publicly available. No recommendations from the REAL charter appear to be represented in the Recovery Plan, but many of the focus areas overlap. Although the City dedicated resources toward developing targeted equity frameworks and toolkits prior to the COVID-19 pandemic, it appears these processes were too underdeveloped to be fully utilized when they were needed for the federal recovery allocation process. It is also difficult to assess the impact of the administrative change in the continuity of these initiatives, as both the Budget Equity Program and REAL were launched during the former Mayor Warren's tenure.

Monroe County's primary equity mechanism appears to be the Commission on Racial and Structural Equity (RASE), a joint initiative launched by the City and county in June of 2020. The commission released a report in March of 2021 with recommendations to reform local City and County policies and provide supportive investments to Black and Latine communities to reduce structural inequities.[27] Although Monroe County included this report in its initial synthesis of community plans to determine overarching priorities for ARPA funds, it is not clear how any specific recommendations may be carried out through the county's ARPA RFP process. As mentioned, RASE's recommendations are also not heavily referenced in the city's plans for ARPA allocations. As a joint commission between the City and the County dedicated to addressing structural inequities, RASE could have served as a foundational platform for both jurisdictions to ensure their equity practices and processes were consistent and promoting the most inclusive outcomes possible.

The challenges faced by Rochester's local governments speak to the need for localities with similar barriers to coordinate across jurisdictions to implement structural changes that embed institutional equity processes and tools throughout their systems of governance. Creative models of resident outreach, community advisory boards, and close working relationships with community-based organizations can help localities address chronic disengagement amongst residents. To ensure these outreach efforts build trust amongst those who participate, localities must also substantively follow up with residents and organizations to demonstrate how their input meaningfully informed resulting decisions. Collaboration between jurisdictions is also vital to maximizing available resources and meeting the deep and persistent needs present in communities like Rochester's. Implementing tools and frameworks developed through equity initiatives and utilizing them across joint jurisdictional platforms will not only amplify the impact of these mechanisms but demonstrate progress to residents. As local leaders work to overcome the tremendous challenges of poverty, entrenched inequities, and engrained community distrust, establishing a baseline of transparency, accountability, and coordination across jurisdictions is paramount.

"The best way to spend these dollars is to lift up, is to get them into the hands of people that have been on the margins. Because when you look at every data point you see the same people on the bottom. And they represent not only an anchor to the community's growth in some sense but the intrinsic human dignity that people deserve to have their aspirations realized according to the amount of effort that they are willing to put in. That should be more than just rhetoric. That should be the reality"—Rochester community Interviewee

Memphis, Tennessee: A Top-Down Approach

On the whole, Memphis and Shelby County's ARPA allocations were completed quickly and with limited community engagement beyond outreach to existing community partners. Much of the funding was allocated toward operational budget gaps and public safety. Although some funds were allocated to community development and pressing community needs, the process by which the recipients were determined was not always transparent and there were no written RFPs or clear selection criteria. For the limited money that did go to equity goals, there was a focus on data-driven outcomes, but this often resulted in money going to larger, more-established organizations.

WHAT DID THE PROCESS LOOK LIKE?

Between the City of Memphis and Shelby County, the greater Memphis area received a combined $298 million in federal ARPA funding.[28] Beginning in the summer of 2021, the Memphis Mayor's Office, the Memphis City Council, and Shelby County drafted their own separate ARPA allocations.[29] The Mayor's Office completed the first round of allocations, assigning 88 percent or nearly $150 million of the City funds and then passing the remaining $20 million on to City Council to allocate. For both City Council and the Mayor's Office, determining who received allocations was primarily an informal process—there was no formal RFP or written criteria on how the City determined who received funding. City Council hearings were open to the public, but mayoral allocations were largely not public and relied on existing relationships with partners and were guided by four priorities laid out federally:

1. To respond to the public health emergency or its negative economic impacts, including assistance to households, small businesses, and nonprofits, or aid to impacted industries such as tourism, travel, and hospitality;
2. To respond to workers performing essential work during the COVID–19 public health emergency by providing premium pay to eligible workers;

3. For the provision of government services to the extent of the reduction in revenue due to the COVID–19 public health emergency relative to revenues collected in the most recent full fiscal year prior to the emergency; and
4. To make necessary investments in water, sewer, or broadband infrastructure.[30]

Although the Treasury Department has implemented changes that enable more inclusive outreach, such as promoting linguistically relevant outreach,[31] these priorities laid out a vision that focused on filling in budget gaps rather than achieving equity.

Several interviewees from the city highlighted the importance of funding evidence-based and data-driven initiatives, meaning that the nonprofits that received ARPA funding had a proven track record of success. According to one nonprofit interviewee, “If the mayor wanted to find a partner for investing in youth programs, there are a handful that are in the mayor's portfolio or that have worked with the mayor before. And I think in those cases, they looked at who had the best numbers. The mayor is very interested in or really tries to do as much data-driven decision-making as you can.” This strategy led to funding larger nonprofits like the Boys and Girls Clubs of Greater Memphis, which has clearly published metrics on their high school graduation and college or training placement and as a result received $9,000,000, accounting for the majority of the money allocated toward youth programming.[32]

Shelby County’s process was separate from the City Council and Mayor’s Office. The County released funding allocation in tranches, and modeled their process after their CARES Act allocation process.[33] The process began by reaching out to critical divisions of County Government, including the hospital system and the Sheriff’s Office. From there the County partnered with key organizations such as the Memphis Urban League to determine priorities and the allocation process. Shelby County also managed the allocations for municipalities within the County that, unlike Memphis, were too small to manage their own allocations.

HOW WELL DID MEMPHIS ADHERE TO BEST PRACTICES?

Community Engagement

The community engagement process in the City of Memphis primarily relied on public City Council hearings (for the small percentage of funds that were allocated to the council to distribute), and meetings with preexisting community leaders (for the mayor’s larger allocation) but did not incorporate multimodal opportunities for community input. Community members were not paid for participation and there was no outreach process to encourage or incentivize community input in the allocation process. In terms of the City Council’s outreach efforts, although some members of the public were aware of the opportunity to present a funding proposal to Council and took advantage of it, according to a Council employee, those people were mostly those generally involved in Council ongoings—there was no proactive outreach to new community members to join the public process. Additionally, no incentives were provided to community members for their time or participation in the allocation process or to bring new community members into the process.

“Now, I would guess 98 percent of Memphians aren't listening in to council meetings or particularly committee sessions… so even though it was public, it just really wasn't in the public.”—Memphis nonprofit Interviewee

This means that although on paper the process was public, it was not necessarily an accessible or equitable process. Rather, it was rushed ad-hoc, with limited direct outreach. We heard from city interviewees that this was in part because of tight deadlines placed on the allocation process, but, the state government and the US Treasury Department have both said that they were not involved in the timeline determination for ARPA allocations.

Several community plans in Memphis could have been used to lay the groundwork for identifying priority areas for recovery dollar spending focused on equity and inclusion. The Memphis 3.0 Plan, the Moral Budget Proposal, and Equity in Action (2019) are three community plans that to one degree or another involved community input in determining priorities (Stacy, Walker, and Dedert 2022a). The Equity in Action plan had limited community engagement and was primarily a strategic document for the school district. The Memphis 3.0 Plan was informed by a more robust community engagement process that included online surveys, public meetings, focus groups, meetings with community stakeholders, and community asset mapping. However, the plan was drafted before the COVID-19 pandemic and does not necessarily reflect community priorities since the onset of the pandemic. The Moral Budget Proposal, on the other hand, has been updated since the onset of the pandemic and reflects the priorities of a wide range of community-led organizations. But with the exception of rental assistance and broadband investments, these community priorities were largely not reflected in the ARPA funding allocations.

Although some allocations were made that reflected community priorities, the majority of the city’s ARPA allocations were primarily a reflection of the federal priorities named, meaning that funds went toward operations, public safety, and public health that arose as a result of the pandemic, rather than toward a long-term and equitable vision for the city. An interviewee from the city underscored this point, saying “we knew we needed to do some quick stuff. So, we had some really swift implementations to try to meet some of those urgent needs operationally in our community where we were helping get vaccines out, we were helping hospitals that were overrun, and how can we work together to do that?”

However, on the whole, much of the allocations throughout the City and County went to operations, revenue replacement, emergency public health response, and public safety (Stacy, Walker, and Dedert 2022b). With the exception of infrastructure (which constituted a smaller portion of spending) and public safety (which was not part of the four priorities), the investments broadly reflected the priorities laid out by the city but also underscored the notion expressed by a nonprofit interviewee that, *"You have the opportunity in this moment to establish or do proof of concept, investing in more progressive policies, really do something meaningful around an affordable housing ... And I do understand that first responders in a pandemic need to be made whole, but you get elected in Memphis talking about crime. And so, the default is always police first."—Memphis nonprofit interviewee*

Using Data and Evidence to Understand Needs and Inequities

Memphis' focus on data-driven decisionmaking highlights the double-edged sword of data-driven decisionmaking. Although requiring funding recipients to have published metrics and evidence of success can ensure organizations are accountable to the public, doing so can also create a high barrier to entry for smaller nonprofits. As one County interviewee explained, "In Memphis and Shelby County, we say we have over 5,000 nonprofits, and that doesn't include churches. And so how do we identify the nonprofit that can actually execute and do the work at a large scale? ... So, we made a decision specifically with our restaurant worker and hospitality worker program, we made a decision to collaborate with a well-established organization, the Memphis Urban League, our local chapter of the National Urban League." Individually vetting and allocating funds to every nonprofit that applies would be a very time-consuming process and would not have made sense given the quick turnaround for ARPA funds. However, allocating $9,000,000 to one organization, as happened with the Boys and Girls Club, or primarily relying on one well-established organization like the Urban League, also limits the city's ability to support smaller grassroots organizations.

According to a Mayor's office interviewee, "the city did reach out to various CBOs to be part of taskforces throughout the federal allocation process." An interviewee from the city explained the process of reaching out to nonprofits to gain insight into challenges and opportunities, saying "We met with some of our community partners. We met with Mid-South Food Bank. We met with the housing assistance. We met with Habitat for Humanity." Although this outreach process was framed as part of determining allocations, interviewees from nonprofits we spoke with expressed the sentiment that although task forces and meetings are appreciated, the impact of those task forces and the ultimate decisionmaking mechanisms are often not clear. One nonprofit interviewee that we spoke with, framed it as "I saw people meeting together in bars, and then suddenly some decisions were made." The mayor's decisionmaking happened largely behind closed doors, making it difficult for local organizations and residents to understand who received funding and why.

Considering Equity Implications of Decisions

"The allocation should look like Memphis" was a refrain repeated by many city interviewees. Although this led to a portion of the allocations going to homelessness and blight and geographically focused investments, there was little disaggregation of data that would allow the city to monitor the impacts of their funding on an ongoing basis, particularly with an eye toward understanding how funding affected those hardest hit by the pandemic. And achieving equity for historically disinvested communities does not simply mean investing in those communities—it means investing in those communities *disproportionately* to account for intergenerational disinvestment. Although some funds targeted blight and low-income residents, it was not a significant amount of the overall budget, and the majority of the funds went for citywide initiatives such as public safety and operational expenses.

The city put together a public presentation that laid out the federal priorities for spending, but beyond that, few formal criteria were laid out, and no formal RFP was issued to determine allocations. Although a formal RFP can sometimes be a hinderance for smaller organizations, in this case it would have provided organizations of all sizes with a more even playing field, since publicly announcing the opportunity allows for more engagement from smaller nonprofits and other organizations that may not have established ties with government. Formal RFPs are also a way to see an official documentation of what leadership is prioritizing and to ensure that funding recipients adhere to the criteria laid out. Memphis's lack of formal outreach and focus on already established, evidenced-based projects limited smaller nonprofits' likelihood of receiving funding.

Chicago, Illinois: Amid Time and Staffing Constraints, Weighing Historic Harms with Emerging Needs

In Chicago and Cook County, Illinois, the city's and county's approaches to incorporating public feedback in recovery allocations differed in their weight of organizational and community-based outreach and their focus on equity. Although both jurisdictions saw overall low rates of engagement in public forums, Cook County supplemented these meetings with online surveys and door-to-door engagement with community members, while Chicago convened community organizations, faith leaders, and other stakeholders representing the interests of different communities. Even with an interest in pursuing innovative programs, staffing and time constraints, as well as procurement requirements, limited governments' capacities to develop new programming, and in Chicago, led to the prioritization of "off the shelf" plans. Amid these constraints, both jurisdictions still wove equity into their allocation determinations, with Chicago prioritizing underinvested neighborhoods and Cook County using an equity scoring rubric to evaluate spending ideas from government staff and the public.

WHAT DID THE PROCESS LOOK LIKE?

As federal funding for the COVID-19 pandemic recovery became available, both the City of Chicago and Cook County conducted a public engagement process to solicit feedback from government staff and community members on spending priorities, particularly for ARPA State and Local Fiscal Recovery Funds (SLFRF). The City of Chicago hosted four meetings with citywide leaders, six regional roundtables with community-based organizations, four internal focus groups with the City of Chicago Commissioners, three budget forums for resident feedback, and focus groups with labor and faith leaders, as well as members of the city's advisory and engagement equity councils (City of Chicago 2021). In all, the city estimates it engaged with roughly 400 community-based organizations, labor organizations, faith leaders, equity leaders, and other city stakeholders. However, they engaged directly with only about 260 residents through in-person and online forums (City of Chicago 2021).

Cook County adopted a three-tiered community engagement approach spanning broad outreach, which included town halls and two online surveys; hyperlocal engagement with affected communities, or those experiencing the greatest negative effects from COVID-19 or that have historically experienced disinvestment; and “place-based outreach” for longer term engagement (Cook County, Illinois 2021). The County’s ARPA strategy was rooted in six policy priorities outlined in 2018 under the County Board of Commissioners’ President, including health and wellness, economic development, criminal justice, environment and sustainability, public infrastructure, and good government, with funding falling into four categories: near-term funding opportunities; transformative initiatives; county operations, program administration, and contingencies; and technical assistance and support for local governments to administer funds (Cook County, Illinois 2021). The County Board of Commissioners’ President’s policy priorities were derived from a community engagement process that included survey responses from approximately 1,500 residents, community meetings with 278 residents, and broader feedback forums from community partners, stakeholders, and county government staff (Cook County, Illinois 2018). For ARPA funds, the County used an equity scoring rubric to evaluate proposals, and county interviewees described a process in which county policy teams submitted memos for initiatives that included program descriptions and information on how the program would support equitable recovery.

In July 2021, Cook County launched a website and interactive survey for the community to provide input on needs and priorities for ARPA funding, surveying approximately 30,000 people who generated more than 270 individual funding ideas. The County also conducted door-to-door canvassing in the county’s south and southwest suburbs, areas with the fastest growing population of people with income at or below the federal poverty level,[34] and partnered with Forefront, a resource provider for nonprofits and grantmakers, to hold 10 virtual town halls with residents and 4 town halls with nonprofits and foundations. The county engaged 107 residents in these sessions (Cook County, Illinois 2021).

HOW WELL DID CHICAGO ADHERE TO BEST PRACTICES?

Community Engagement

Interviews with city and county staff, as well as community organization interviewees, indicated a clear awareness of best practices for community engagement, even with acknowledgements of time and staffing constraints that at times impaired their ability to achieve these best practices. First, interviewees acknowledged that meaningful community engagement requires trust between policymakers and the communities they serve. Absent dedicated community outreach staff—people one interviewer indicated “are the first to go” amid budget constraints, even before the pandemic—government staff we spoke to noted the difficulty of garnering community trust and enthusiasm in a collective decisionmaking process. In cases where community engagement staff are not well embedded into government operations, there can be a sense that:

In the middle of a crisis, when we are coming to people asking what to do, there's also a sense of, 'You're the government. You're supposed to do something here.' There's a level of responsibility there that I think it's probably more advantageous to have these long-term relationships with folks...And the person, whoever it is, at the town hall, needs to be able to answer a lot of questions, and it's hard to do that if you don't work in government day in, day out.—Cook County government interviewee

Both Chicago and Cook County relied on a range of modes of gathering community input, with an emphasis on online engagement as COVID-19 largely shuttered in-person meetings. Cook County offered both virtual surveys and town halls and conducted in-person, door-to-door outreach to gather community input on ARPA spending. Cook County also created a dedicated website, Engage Cook County, specifically for COVID-19 recovery engagement, driving community members to one dedicated resource for recovery feedback. Chicago conducted focus groups with stakeholders ranging from faith groups to labor organizations, and held three forums for residents to provide input on budgets. Both jurisdictions fulfilled basic community engagement practices amid time constraints and the urgency of allocating funds mid-crisis, but within Chicago, offering more than three budget forums and offering multiple modes of community input on the budget could have widened opportunities for public engagement.

Digital engagement presents trade-offs. It allows people who may face mobility or logistical barriers to in-person engagement to participate in public meetings, but it also privileges people with reliable internet access. Chicago and Cook County's digital divides shape who has access to virtual surveys and meetings, and households with pressing needs may be underrepresented in digital forums. In Chicago, about 20 percent of households are not connected to the internet, and in Cook County, 25 percent of residents lack high-speed internet.[35, 36] Moreover, virtual forums dedicated to needs in a particular neighborhood or among a specific constituency can be challenging to manage, because people from outside of those designated communities can readily join online meetings.

With the pandemic, everything online became amplified, and that didn't necessarily represent masses. It just represented who could kind of occupy the loudest microphone. And that's hard. It's hard to know if that idea is truly representative of the group that lives in that community. When you built it, you said it was for that community. You said let's talk to the South Side. But any number of people can join

the calls.
—Chicago city government interviewee

A best practice of community engagement is for governments not only to offer opportunities for residents to provide ideas and continuous feedback on policy priorities, but also to follow up on engagement by sharing how community feedback was collected and was or was not applied to decisionmaking. Cook County made strides in this effort by making topline summaries of its community engagement methods and feedback results public, releasing an engagement report that showcased summary findings from surveys and community priorities by region, race and ethnicity, gender, and age. Categories within these demographics were inclusive to a range of identities, including transgender, nonbinary, and Indigenous people. This type of data disaggregation is essential for identifying needs across unique demographics and constituencies, and for driving evidence-based policymaking tailored to these needs. However, it is not known how representative respondents were of the county population as a whole because the county did not publish full survey respondent data and did not collect demographic information for one of its surveys of 30,000 people. Publishing respondent data with appropriate anonymizations and deidentifying measures could have enhanced transparency and understanding of different populations' priorities.

Both Chicago and Cook County reported relatively small numbers of community members represented in ARPA engagement forums; Chicago's community meetings reached 260 community members, while Cook County's 10 virtual town halls engaged 107 community members. But both jurisdictions' efforts to engage community groups and stakeholders that represent community interests likely widened their reach and improved the extent to which federal recovery plans captured community need. Logistically, it may be more feasible for a government to convene a group of representatives from, for instance, faith institutions rather than gather thousands of those institutions' members for a public feedback session. Chicago's engagement of stakeholder groups offers a proxy for community interest when time and resource constraints may limit the public's capacity to offer direct input. Cook County's partnering with Forefront, a resource provider for nonprofits and grant-makers, likely also bolstered its capacity to design, prepare, administer, and follow up on town halls.

However, meeting with community leaders and representatives should not replace direct outreach with community members, who in some cases may express different priorities from community organizations. Pairing direct engagement with both community members and trusted community organizations, and compensating them for their time and expertise as a best practice, can help ensure government decisionmaking incorporates broader perspectives. As one Chicago community organization interviewee said, this kind of engagement and direct knowledge sharing can be helpful in broadening community awareness and opportunities for input, since "the challenge is that families are busy and, in some cases, overwhelmed. They're going to two jobs, going to school, trying to take care of babies. They're busy, and it's hard to make space to learn about the latest opportunity, even when it might benefit them."

Although government partnerships with community organizations can improve efficiency in identifying public needs, interviewees from community organizations described differing degrees of access to decisionmaking tables. Although both Chicago and Cook County were proactive in engaging community groups in the early days of the COVID-19 pandemic, interviewees described how existing relationships—such as serving on pre-pandemic on committees or task forces—facilitated opportunities to share their respective organizations' priorities with government leaders once the pandemic hit. One interviewee that had previously worked in a leadership role in a food bank noted being in regular contact with the city given the nature of her work, and she recalled the city's immediate outreach in the early days of lockdown to strategize on food access. Others felt they were responding to city decisions rather than proactively shaping strategies, and they pushed for opportunities to meet with government officials to share information and needs among particular interest groups. As Chicago managed an influx of information on neighborhood needs, interviewees noted some information being drowned out. For example, when the city developed indicators for pandemic response and outreach for Covid-19 testing, one interviewee noted an outreach plan that had excluded a neighborhood with a large Latine population, leading to a sense that, as one community organization interviewee said, "one hand was working on it, but that wasn't the hand apparently that we were meeting with and talking about COVID-19 outreach efforts."

Finally, Both Chicago and Cook County used existing policy plans to develop frameworks for federal recovery spending. Shortly before the COVID-19 pandemic began, Chicago convened Solutions Towards Ending Poverty, a large-scale poverty solutions summit. Recommendations from this meeting, as well as from other city strategic planning documents, positioned the city to generate ideas for ARPA funding. At the summit, the city committed to partnering with communities to define poverty and economic hardship and develop community-centered metrics to measure anti-poverty work on an ongoing basis (City of Chicago, Illinois 2020). In developing its ARPA strategy, Cook County used a 2018 policy framework to designate programmatic categories onto which community ideas could be applied. Although using existing frameworks is efficient and minimizes the risk of community survey fatigue, real-time surveying is also essential for understanding shifting community priorities amid the economic shock of the pandemic. Both Chicago and Cook County mobilized quickly to pair existing plans with emerging community and government staff feedback.

Using Data and Evidence for Understanding Needs and Inequities

Both Chicago and Cook County paired qualitative and quantitative data to prioritize investments. While building on existing policy frameworks and strategies that were also built on community and staff input, Chicago solicited public and staff feedback to shape preliminary priorities that were evidence-based, could be rapidly executed, represented the city's strategic values, and had potential for financial continuity (City of Chicago, Illinois 2021). In its performance reports, the city outlines evidence from programs in other cities that informed its own allocations, such as Stockton, California's guaranteed income program and a direct cash assistance program for workers in Philadelphia, Pennsylvania, citing data from those program's outcomes (City of Chicago, Illinois 2022). Cook County's door-to-door surveying, online surveying, and stakeholder forums surfaced community priorities on housing, mental health, and infrastructure, each of which are reflected in the county's ARPA recovery plan.

Geography also mattered in how both Cook County and Chicago mapped funds to equity goals. Cook County identified priority communities for investments through existing frameworks and datasets, such as a community social vulnerability index, which led to efforts prioritizing Suburban Cook County. Chicago also targeted funds by geography, prioritizing projects in the city's South and West sides to redress both historic disinvestment and exacerbated challenges in the immediate onset of the pandemic in those neighborhoods.

When using data to evaluate programs, it is important for leaders to note that data may misrepresent experiences of certain subpopulations. For instance, interviewees noted that in the early days of the pandemic, Chicago informed its rapid health response in part by hospitalization rates, and expressed concern that this data may have not fully captured needs among Latine communities. Although Latine people are more likely than white people to have been hospitalized from COVID-19,[37] they are three times As the pandemic progressed, Latine people were among the most likely populations to delay medical care due to financial strain and lack of insurance (Ahmed, Song, and Wadhera 2022). As such, even high hospitalization rates may have underestimated the number of Latine people with COVID-19 and related health issues. Using hospitalization rates to shape public health policy is, on the surface, an evidence-based approach, but policymakers must consider who may be underrepresented in the data sources used to make investment decisions. As the pandemic progressed, Latine people were among the most likely populations to delay medical care due to financial strain and lack of insurance (Ahmed, Song, and Wadhera 2022). As such, even high hospitalization rates may have underestimated the number of Latine people with COVID-19 and related health issues. Using hospitalization rates to shape public health policy is, on the surface, an evidence-based approach, but policymakers must consider who may be underrepresented in the data sources used to make investment decisions.

"We've got to start looking at the data. And we had to think about how to do this with the backdrop of the fact that Latinos are the group least likely to participate in publicly funded programs, they're elderly, are not in congregated settings at a rate anywhere near any other racial or ethnic group…They also are the group least likely to show up for healthcare unless things are really bad…If you don't measure it, you can't fix it."
—Chicago community organization interviewee

Considering the Equity Implications of Decisions

To evaluate ARPA flexible fund allocations, Cook County developed equity criteria, reviewing proposals from government staff and the public based on degree of economic impact and focus on populations hardest hit by the pandemic. Their equity scorecard served as an internal evaluation and accountability framework and allowed for clearer external justification of why some proposals advanced and others did not.

In Chicago, one challenge the city faced in equitably distributing federal recovery dollars was that bureaucracy designed to limit corruption created barriers to efficient allocation processes. Historic challenges of corruption in local government have prompted the city to take on a robust RFP and competitive bidding process for public funds in an effort to thoroughly evaluate potential fund recipients based on qualifications rather than insider relationships. Although competitive bidding is a strong practice for elevating qualified applicants over well-connected ones, because the city's RFP process is so intensive, interviewees reported that smaller nonprofits and community groups often find it difficult to navigate the process and compete. Moreover, in cases where the city aims to award funds to a neighborhood organization for a project in that same neighborhood, there may be one qualified organization able to deliver on the service needed, but an RFP is still required. Interviewees described the procurement process as a "better safe than sorry" approach that can nonetheless cause "institutional inertia," slowing the speed at which dollars can move out the door. Although interviewees noted that this process can put smaller organizations at a competitive disadvantage, they also noted that Chicago's Department of Procurement Services holds monthly workshops to teach business owners and community organizations how to respond to RFPs, an important step in bridging awareness and capacity gaps among well-resourced businesses and smaller or first-time bid respondents.

The fundamental truth about everything that's happening right now with ARP spending is the staff to execute these projects. You could come up with a whole list of new projects, and that's secondary to who the hell is going to implement it...There's not a lot of brand new ideas that have never been discussed before, which doesn't mean it's not impactful, but it definitely wasn't a place to kind of sit back and think of something that never has been done.

—Former Chicago government interviewee

Time and staffing constraints also affected the process and limited the City's ability to implement innovative and transformative projects. Chicago government interviewees described balancing the desire to advance innovative projects with staff and timing resources that often limited the scale of what could be done, prompting policymakers to advance "off the shelf" ideas. Interviewees shared that administrations that had already adopted an equity mandate before the pandemic, including in Chicago, were better positioned to meet the moment of ARPA funding and align funds to redress historic disinvestment. But time constraints limited how much work governments could advance with one funding tranche, and staffing challenges prompted a need to partner with area nonprofits and other organizations to stand up programs. Cook County's ARPA engagement strategy acknowledged this inherent tension by filtering funds into categories including near-term funding opportunities and longer-term, transformative investments.

Finally, interviewees had differing views on whether to prioritize funds for long-standing issues of inequity that the pandemic magnified or for new challenges resulting directly from the pandemic, like small-business losses. Although separate dedicated funds, like the Paycheck Protection Program (PPP) and expanded unemployment insurance, were designed to address some of these immediate and urgent losses, program implementation was rife with delays, unequal access to funds among communities of color, and, in some cases with PPP, fraud that undermined the flow of funds to high-need recipients (Henderson 2020; Liu and Parilla 2020; Small Business Administration 2022). The impacts of financial and health losses early in the pandemic disproportionately affected people of color, with varied impacts on different racial and ethnic groups. For instance, job and wage losses in May 2020 disproportionately impacted Latine communities, with 61 percent of Latine Americans reporting that they or someone in their household experienced a job or wage loss because of COVID-19, compared to 44 percent of Black and 38 percent of white adults (Lopez, Rainie, and Budiman 2020).

These disparities both result from historic policies and trends, such as the over- or under-representation of racial groups in certain occupations, and are exacerbated by emerging crises, calling for a dual approach to government funding allocations. Federal ARPA guidelines call for subnational governments to apply funds toward equity programming, and the nature of inequities—that they stem from historic racist policies and disinvestment—can naturally lead governments to orient spending toward redressing historic harms. However, inequities also manifest in real time, requiring a balance of addressing emergent needs and longstanding challenges simultaneously.

"The resources for Covid were really primarily being directed to address long-term, systemic disinvestment and what Covid has historically revealed and magnified, and not to address what Covid has broken. From our point of view, what Covid has broken is the change in employment, in unemployment, in the robustness of commercial strips, in the incidents of Covid testing, in access to healthcare. Long-term disinvestment did not result from Covid. Yes, it's magnified, but it did not result." —Chicago community organization interviewee

Recommendations

Based on these three regions, we identified the following recommendations that local leaders across the country could take to increase equity and inclusion in future allocation decisions. The recommendations, while rooted in the local context, are broadly applicable to municipalities seeking to build on the success and learn from the challenges of other municipalities.

Community engagement

- Local governments must **invest in ongoing, long-term community engagement and trust building,** which means having dedicated community engagement staff who build relationships and trust with community members not only in times of crises, but on a continual basis. Many of the local governments we spoke with noted that they did not have a dedicated community outreach specialist at the start of the COVID-19 pandemic since they had been laid off due to budget cuts prior to the pandemic. This left them without the staff or the community trust to conduct quick and responsive outreach to communities in need. Long-term engagement is necessary so that when a crisis strikes, local governments have the trust and foundation for building new equity strategies based on these existing plans and relationships. However, they should not base their allocations solely on those existing plans, but rather pair those plans with ongoing community engagement efforts to ensure that allocation decisions reflect changes in community priorities. During crises when there is a need to serve communities quickly, ideas from prior community-engaged policy plans can provide a foundation for new or adapted programs and ensure prior feedback is being continually embedded in government response.
- The community engagement that local governments conduct should be deep, meaningful, and **disproportionately target people with low incomes and people of color** so that engagement does not end up just raising the voices of those already with power and opportunity. For instance, when conducting a survey or door-to-door outreach, jurisdictions should oversample and conduct extra outreach in communities of color and communities with low incomes who have been historically excluded from decisionmaking.
- Leaders should **collect data on the race/ethnicity and income of community engagement participants**, with a focus on including historically excluded groups. Leaders should monitor engagement by these characteristics and by neighborhoods and adjust outreach strategies to ensure that engagement is representative of the population as a whole, or even better, that overrepresents communities that have been historically excluded from decisionmaking. And, if community engagement processes prove unsuccessful at proportionately representing all groups (or overrepresenting historically excluded groups), leaders can weight responses so that they better represent that of the whole community. Although governments should aim to minimize barriers to engagement, implementing basic, voluntary virtual meeting sign-up forms that request information like age, race, and zip code can help governments assess the representativeness of participants in a given forum. Offering voluntary forms can create a

platform to gather disaggregated data without impeding participation of people who prefer to not share demographic information. It is important to bear in mind that the people who prefer not to share their information may be more likely to be underrepresented, meaning that opting out may not be random and that data gathering should be coupled with trust-building.

- Jurisdictions within a region should **collaborate and coordinate** across themselves to meet the needs present in their communities. A disjointed process across nearby jurisdictions can create duplicated work and distrust amongst community members who do not understand the processes and timelines.
- Governments must **clearly communicate the opportunity to provide feedback and be clear about how feedback will be incorporated into decisionmaking**. They must also return to the community after decisions have been made to share how their input was incorporated into decision-making and next implementation steps. Soliciting feedback from community members and then not using that feedback to make decisions or not clearly communicating back to the community how you used it (using as intensive of an outreach strategy as was used for the original feedback including multiple modes of communication—in-person meetings, online notification, etc.), can dissolve trust with community members and reduce the likelihood that they will participate in the future if they feel that the time they spent led to no change.
- Local governments should partner with, and pay, community-based organizations to assist with community engagement to widen their reach. Partnering with organizations that are well connected to and trusted by the communities they serve can help governments reach constituencies with whom they may not already have deep relationships, or who may be skeptical of government engagement given past disinvestment or harms. However, local leaders should reach beyond their inner circle of community-based organizations to ensure that they are reaching all community serving groups, especially those that serve communities of color and communities with low incomes.

Using Data and Evidence for Understanding Needs and Inequities

- Leaders should fund a mix of both evidenced-based and established projects and organization as well as **new pilots and smaller organizations that do not have a long history of data and evidence**. Only funding projects and programs that have a proven track record can inadvertently cause local governments to keep funding the same larger organizations and projects over and over and never try new solutions or fund smaller groups. This can also result in less funding for groups led by people of color due to a history of underinvestment in such groups.
- Governments should make the prioritization rubric public facing so the public can understand leaderships’ priorities, and what data are informing decisionmaking.

- Governments should **work to collect data disaggregated by race, ethnicity, language, gender, and disability**, to capture experiences of those who may not be fully captured in conventional surveys or data collection methods. Governments should include representative categories in survey wording, conduct outreach to groups who may be underrepresented in data, and build trust in governments as responsible data stewards.
- Governments should also **acknowledge limitations of survey or administrative data, and who may be undercounted** when using data to assess community need. Considering factors such as nonresponse bias, but also trends in sources like hospitalization, insurance, or employment rates, can give insight on where additional outreach may be needed to paint a fuller picture of community need.

Considering Equity Implications of Decisions

- Governments should **use equity data to make decisions and embed equity as a criteria for evaluating policies and programs**. Cook County officials described requiring project proposals for federal funds to explain how the proposal would advance equity for priority communities, which is a strong practice for ensuring that projects are evaluated on consistent equity themes, and that staff work toward common equity-driven end goals.
- Leaders should **develop institutional equity processes** and targeted **equity frameworks** to address long-standing patterns of disengagement specific to their political histories and contexts.
- Leaders must be **transparent not only in their allocation decisions** in real time, but also in the **criteria they used to make those decisions**. They should also set up **accountability mechanisms** with outcomes open to the public to ensure that their investments are reducing inequities and achieving their intended outcomes. Timelines for spending decisions should be publicly shared and there should be clarity around when deadlines are coming and what purpose they serve. Many of the people we spoke with discussed the difficulty of completing tasks on a tight deadline without knowing who was imposing that deadline or why it was there.
- Localities should invest in a variety of projects, including short-term and long-term projects, evidenced-based and pilots, and those that address a variety of issues. Most of Memphis's funds went to public safety and filling in operational budget gaps, and of the funds that remained there was a focus on only funding evidence-based organizations. While evidence-based practices make sense because leaders know that they have shown to be effective, there should also be room for cities to invest in newer pilots that address challenges in creative and new ways and that could provide the potential to scale up in the future.
- A balance should be struck between (1) getting funds out quickly enough to help people in need and (2) taking the time to conduct robust community engagement and assess the equity implications of allocations. Leaders must take the time to ensure that funding decisions

increase equity and respond to the needs of communities of color and communities with low incomes.

- Local governments should **use RFPs to minimize the risk of funds going to groups with insider relationships** and provide the opportunity for smaller or less connected organizations (who may be more likely to be led by people of color) to apply for funding. However, they should not use RFPs for all procurement since it can create barriers to innovation and broader equity goal coordination. Although cities must ensure fair processes and vetting, in some cases, strict and bureaucratic contracting processes can incentivize governments to fund shovel-ready initiatives that do not require procurement.
- When requiring RFPs and competitive bidding processes, **governments should offer resources and trainings on their procurement requirements**, as Chicago does, to ensure contractors at varying sizes and levels of experience have information needed to navigate the process and compete.
- Federal, State, and local leaders should require **equity reporting** in internal and external program documents, setting an expectation that program proposals, progress reports, and outcome reports embed equity updates throughout the lifespan of a policy or program.
- State and Federal leaders should create clear funding guidelines and timelines from the beginning that not only allow for adequate time for community engagement and equity visioning, but encourage or even require it. They should also provide real time feedback on what are and what are not eligible uses for the funds, since a lack of clarity about eligible uses led some local leaders to push forward standard initiatives rather than new innovative ones for fear that they were not eligible. Finally, they should provide support and technical assistance for using data to inform allocations that increase equity.

Conclusion

The COVID-19 pandemic has claimed hundreds of thousands of lives and disrupted millions of jobs, reinforcing inequities that existed prior to the crisis.[1] ARPA and other federal recovery funds represent an historic opportunity for local leaders to close the equity gaps exacerbated by the pandemic and address the root causes of pre-existing inequities (Stacy et al. 2022). However, local leaders are deciding how to use these funds with varying levels of inclusion of historically excluded voices and with varying levels of emphasis on equity (Katz et al. 2021).

Although ARPA funding provided an unprecedented opportunity for local regions to recover from the COVID-19 crisis in an equitable and inclusive way, it also came with significant challenges, namely, addressing pressing needs in a timely manner, incorporating community voice, and building inclusive processes that prioritize the communities hardest hit by the pandemic. The three municipalities examined in this brief represent different approaches to allocating funding, each with their own strengths and weaknesses. By learning from these processes, we can ensure that future allocation decisions are inclusive and address the root causes of inequities, thereby closing equity gaps permanently and sustainably.

Appendix A: Methodology

With the help of local partners in each city, we interviewed 23 stakeholders in three categories (table 1):

1. city/county/school board representatives,
2. nonprofits who received federal recovery funding and those who did not receive funding, and
3. nonprofit/grassroots organizations that represent historically excluded residents.

TABLE 1
Number of Interviewees per Metropolitan Region

	Number of Interviewees		
	City/ County/ School board representatives	**Nonprofit/ grassroots organizations**	**Total**
Memphis, TN	3	4	7
Chicago, IL	5	3	8
Rochester, NY	5	3	8
Total	**13**	**10**	**23**

Source: Urban Institute.

Before conducting interviews, we reviewed the literature on inclusive budgeting and planning to identify best practices with which to benchmark each city's process. We then designed interview protocols to assess the allocation process in each city compared to best practices from the literature. From this, we sought to answer three questions: (1) how inclusive was the process for prioritizing funds by topic or goals, (2) how inclusive was the process for determining which programs and groups were funded within each prioritized topic or goal, and (3) how much was equity a consideration in any of these decisions?

Interviewees were asked about the process of allocating flexible recovery dollars (with a particular focus on ARPA dollars), what their engagement was or was not in that process, who else was involved in the process, whether and how community engagement played a role in decision-making, whether equity played a role in the decision-making, whether they felt that the process was inclusive and led to equitable allocations of funding that are in line with community goals, and lessons learned for future decision-making (see interview protocols in appendix B). We also explored whether preexisting community plans were used to decide upon allocations, and if so, whether these plans were inclusively designed.

We then transcribed and analyzed the interviews to describe the process for allocating funds and analyzed the ways in which each city did or did not follow best practices from the literature. This allowed us to identify areas for improvement for future allocations.

Appendix B: Interview Protocol

Context Setting

1. Can you tell me a little bit about where you work and your role there?
2. As far as you are aware, what is the [city/county/school district's] current stage of allocating of federal recovery dollars. What decisions have been made and what decisions have yet to be made?
3. How were decisions about how to spend federal recovery dollars made?

Questions for City/County/School Board:

4. How were the high-level priority areas for spending identified?
    a. What priority areas were identified?
    b. Who was involved in making those decisions?
5. How were final allocations within those priority areas selected?
    a. Was there a competitive process for selecting final awardees?
6. Did equity play a role in the allocation process?
    a. How or how not?
7. Who was involved in the process and who was not?
8. Was community engagement part of the process?
9. If so, how were community members engaged? How many?
10. How did your decision-making process vary from the [city's/county's/school district's]?
11. Which types of organizations did and did not receive funding?
    a. Why did or didn't they?

Questions for Nonprofits/community leaders:

12. What communities do you represent through your position/organization?
13. Were you or the people you represent involved in allocation decisions? If so, how?

14. Do you feel that the process was inclusive and led to equitable allocations of funding that are in line with community goals?
15. Did your organization or organizations that serve the people you work with receive Federal COVID-19 relief funding, either directly or through the City or County?
    a. If yes, how did that come about? Did you apply for it through an open RFP process? Or was there some other process?

For Everyone:

16. What are your feelings towards the allocation process?
    a. What was successful and what could be improved next time?
17. Do you think the process could have been more inclusive?
18. How do you think the process could be improved to better align with equity goals in the region and with the goals of historically excluded populations?
19. If you could design the ideal process for deciding upon the use of federal recovery dollars toward a goal of increasing equity, what would that process look like?

Wrap Up

20. Are there any municipalities or advocacy organizations that you feel are doing a notably equitable job at allocating funding?
21. Is there anyone who you think it is important we speak with to better understand how the process did and did not work in your city?
22. Is there anything we haven't discussed related to federal recovery funding that we should know?

Notes

[1] While a literature review contains many findings applicable to a post-COVID-pandemic context, there are some best practices and innovations that may not fully be captured solely through a literature review alone due to the lag in time that new practices take to make it into reports and articles.

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