



DECEMBER 2020

AUTHORS

Tess Johnson and Eric Noggle

Designing Municipal Cash Transfer Programs to Mitigate the Economic Impact of COVID-19

CENTER *for*
FINANCIAL
INCLUSION

ACCION

Acknowledgments

This report draws on insights gained through interviews conducted with managers of seven municipal cash-based assistance programs, which included the Angeleno Campaign, the City of Atlanta's emergency cash assistance program, the California Immigrant Resilience Fund (CIRF), the City of New York's COVID-19 Emergency Relief Fund, the Chicago Resiliency Fund, the Harris County COVID-19 Relief Fund, and the Left Behind Workers Fund. We also wish to thank Monica Greco, Susana Liu-Hedberg, Sandra Barron, and Colleen Thouez of Open Society Foundations for reviewing and providing us their invaluable feedback on this research.

This work was made possible through the financial support of the Open Society Foundations.

Executive Summary	3
1. Introduction	5
2. Targeting Beneficiaries	6
3. Eligibility Criteria	9
4. Outreach and Onboarding	14
5. Disbursement	22
6. Looking Ahead	28
Annex: Methodology	29
Notes	33



Executive Summary

Government policies restricting movement and curtailing business operations in response to COVID-19 are limiting livelihood opportunities for workers in the United States. Without a savings cushion, this interruption to workers' cash flows makes it difficult for individuals to pay for essentials like food and rent for themselves and their families. While the Coronavirus Aid, Relief, and Economic Security (CARES) Act provided economic impact payments and expanded unemployment benefits for American citizens and other residents, many vulnerable residents, including undocumented immigrants and individuals in mixed-status households, were excluded from this much-needed aid.

To bridge this critical gap in CARES Act assistance, cities, counties, and states across the country, working in partnership with local community-based organizations (CBOs), rapidly established direct cash transfer programs to support their communities. Program managers juggled competing priorities such as getting cash disbursements out quickly, building and maintaining trust with their constituents, and navigating sensitive political environments, tasks so daunting that one program administrator told CFI they were effectively “building the plane while flying it.”

The following paper provides practical guidance to municipalities considering or currently operating direct cash assistance programs. It is based on insights from in-depth, semi-structured interviews conducted by CFI with 12 program administrators representing seven cash assistance programs. This paper describes practices for defining target beneficiaries, establishing eligibility criteria, conducting

outreach, onboarding recipients, and disbursing funds. It highlights the relative advantages and disadvantages of different approaches at each step of the process, especially for undocumented and other marginalized communities.

Key Findings

DEFINING TARGET BENEFICIARIES

The CARES Act does not provide benefits to undocumented residents or residents living in mixed-status households. Practically, several other groups were de facto excluded from this assistance, including residents experiencing homelessness, women experiencing or fleeing domestic violence, individuals being released from prison, and youths aging out of the foster care system. Deciding whom to target with a cash assistance program was the first critical design decision administrators needed to make, requiring an evaluation of community needs, the political landscape, and the infrastructure capacity of the city. This decision also impacts further program design elements, helping to determine what eligibility criteria to select, how to onboard residents, and the methods cities and CBOs should use to ensure data privacy. In practice, nearly all the cash assistance programs identified by CFI were created to support undocumented residents and residents in mixed-status households who were excluded from CARES Act and other public aid. Most municipalities partnered with community-based organizations (CBOs) to help reach populations in need given the depth of their experience working directly with immigrant communities, low-income families, and other constituents who may have little experience interacting with city agencies and government officials.

ESTABLISHING ELIGIBILITY CRITERIA

Administrators of municipal cash transfer programs outlined eligibility criteria that reflected important characteristics of their target beneficiaries, primarily, residency, income level, and ineligibility for CARES Act or other public assistance. Not all eligibility criteria were made public, however, which is largely a function of other program design choices. For instance, open call programs—those that source applicants through public outreach campaigns and centrally process documents—necessarily make their information public, but closed application processes rely on CBO relationships within communities to create and apply eligibility criteria. This can increase data protection by helping to obfuscate recipients; however, there is an inherent tradeoff with program transparency.

CONDUCTING OUTREACH

Outreach strategies are determined by the needs of target populations and respective eligibility criteria for each cash assistance program. The strategies are closely tied to whether a city runs an open call program or not. Most programs examined by CFI had open call application processes, which necessitated robust mass marketing campaigns that leveraged dedicated websites, social media channels, and local news media outlets. In comparison, in programs with closed application processes, program managers relied on their CBO partners to engage with constituents and solicit applications. These approaches, however, raise important questions regarding the equity of these programs: open call applications processes may be able to reach a greater breadth of target populations through their communications channels, but closed programs may achieve greater depth because CBO partners are already embedded within the hardest-hit communities.

ONBOARDING RECIPIENTS

Onboarding beneficiaries—a critical step in which program administrators assess applicants' eligibility and approve or deny them for cash assistance—was the most-resource intensive process for programs evaluated by CFI, requiring managers to expend significant human and information technology resources to collect, organize, and verify residents' applications and determine their eligibility. Many programs opted to use centralized databases for application intake, eligibility documentation upload and verification, CBO assignment, and applicant notification. Some programs needed to iterate these processes to successfully onboard applicants, especially given the high demand for assistance among their constituents.

DISBURSING FUNDS

Cash assistance program managers made two major decisions: one to determine how public and/or private funds would be channeled through city, county, state, and/or CBO entities before being allocated; and another to select a payment method or methods to disburse funds to end beneficiaries. All cash transfers disbursed through these programs were structured as to avoid triggering public charge determinations for immigrant recipients. Half of these programs disbursed their cash assistance through prepaid debit cards, while other programs employed a mix of checks, direct deposits (i.e., ACH transfers), money orders, and other payment methods. Cities and CBOs considering establishing cash assistance programs should assess beneficiaries' financial needs, access, and capability prior to selecting a payment method (or methods) and/or a vendor to work with.

1

Introduction

Government policies restricting movement and curtailing business operations in response to COVID-19 are limiting livelihood opportunities for workers in the United States. Without a savings cushion, this interruption to workers' cash flows makes it difficult for individuals to pay for essentials like food and rent for themselves and their families.¹

In response to the public health crisis and resulting economic downturn, the United States Congress passed the Coronavirus Aid, Relief, and Economic Security (CARES) Act, which sent economic impact payments to Americans and expanded unemployment benefits. The CARES Act prohibited the distribution of social support to certain marginalized and vulnerable populations, including residents with irregular immigration statuses² or those belonging to mixed-status households.³

Recognizing the assistance gap created by the CARES Act, cities, counties, and states across the nation began establishing cash transfer programs to support individuals in these communities. Working with local community-based organizations (CBOs), these municipalities and states set up cash transfer programs in record time.⁴ As they did so, they worked to strike a balance between responding quickly, building community trust, and protecting beneficiaries' private information in a political environment

where the federal government is hostile toward undocumented and other immigrant residents.

Building on lessons in designing these programs, this paper provides practical guidance to municipalities considering or operating direct cash assistance programs of their own. The paper reviews practices for defining target beneficiaries, establishing eligibility criteria, conducting outreach, onboarding recipients, and disbursing funds. It highlights the relative advantages and disadvantages of different approaches at each step of the process.

The paper contributes to an emerging body of work analyzing public, private, and nonprofit-led responses to the coronavirus, especially through direct cash assistance,⁵ which is rapidly evolving, given the relative novelty of the pandemic. It focuses on direct cash assistance programs that have raised between \$750,000 upwards to nearly \$50 million for disbursement. It also complements previous research on the role of government-to-person (G2P) transfers in strengthening social safety nets⁶ and underscoring the importance of unrestricted cash transfers⁷ for building and sustaining wealth in communities more broadly. Although CFI examines the potential risks of these programs for immigrant and undocumented communities, this paper does not examine the implications of receiving these funds for public charge determinations in great depth.

TARGETING
BENEFICIARIES

ESTABLISHING
ELIGIBILITY
CRITERIA

OUTREACH AND
ONBOARDING

DISBURSEMENT

2

Targeting Beneficiaries



Background

The CARES Act provided economic and social service support to vulnerable Americans impacted by COVID-19. For individuals and households, the centerpiece of the program was economic impact payments structured as one-time, refundable tax credits. To receive a payment, individuals needed to have a Social Security number (SSN). The structure of the CARES Act excluded several vulnerable populations from economic relief, including:

- Undocumented immigrants
- Mixed-status, married couples filing jointly (a situation in which one person files taxes using a SSN and the other uses an individual taxpayer identification number [ITIN]^{1, 8)}
- U.S. citizen children of undocumented immigrant parents
- U.S. citizen adult-age children who are tax dependents
- U.S. citizen adult tax dependents

Many of these groups—particularly undocumented immigrants—are excluded from other social services, including unemployment benefits and nutrition assistance. This is a critical hole in the social safety net.

Additionally, as the pandemic raged, it became clear that there were groups within communities who were de facto left out of the CARES Act. These included residents experiencing homelessness, women experiencing or fleeing domestic violence, individuals being released from prison, and youths aging out of foster care.

Consequently, the decision about which of these groups to serve is the first design choice municipalities need to make when developing a cash transfer program. This decision should be derived from an assessment of community needs, the political landscape, and infrastructure capacity. The decision of who to serve will impact the creation of eligibility criteria, data protection policies, and onboarding processes.

Nearly all the cash assistance programs identified by CFI were created to support undocumented immigrants and mixed-status households who were ineligible for CARES Act assistance and other forms of public assistance. Many cities CFI examined were ideally suited to offer programs targeted to immigrant communities specifically.

¹ An individual taxpayer identification number, or ITIN, is a tax processing number issued by the Internal Revenue Service to an individual who is required to have a U.S. taxpayer identification number but who does not have, and is not eligible to obtain, a Social Security number (SSN) from the Social Security Administration.

ASSESS

Community Needs: Administrators should work with local government agencies and a broad coalition of community-based organizations (CBOs) to do a rapid assessment of community needs and services already provided. Cities should also determine the size of the population excluded from the CARES Act as well as the scope of requests for assistance (such as cash transfers, rental assistance, and food aid).

Political Landscape: Political support is important for a program to be successful. This includes support from within the government at the city, county, and state levels and throughout the business community. Cities and states politically supportive of immigrants are better able to develop, promote, and protect immigrant-only relief. For those facing a more hostile political environment, a program targeting a broader population may be the best option for getting relief to undocumented immigrants.

Infrastructure Capacity: Especially in small- and medium-sized municipalities, reviewing available infrastructure for intake, distribution, and data protection can be an important consideration in determining whether to do an immigrant-only program, which is often smaller, or one that targets a larger portion of the population.

DESIGN IMPLICATIONS

Eligibility Criteria: The decision of who to target will impact the selection of eligibility criteria. Arguably the most important issue is how individuals will prove they were not eligible for or did not receive CARES Act relief payments, as this could require undocumented immigrants transferring personally identifiable information (PII) regarding their status to administering agencies.

Data Protection: While data protection is important for all recipients, the stakes are very high for undocumented immigrants. CFI's research suggests that cash transfer programs are not a significant onramp to deportation proceedings. However, CBOs and cities have highlighted the importance of data protection and the level of obfuscation in a program will be impacted by whether a program is immigrant-only.

Onboarding Processes: A program that targets a broad population will conduct outreach and onboarding differently than a program targeted at a specific segment. An immigrant-only program requires close collaboration with trusted CBOs and outreach may occur door-to-door, compared to a broader program which can rely on open call applications.

In Practice

GCIR has the infrastructure and political buy-in to support an immigrant-only program.

The California Immigrant Resilience Fund (CIRF), operated by Grantmakers Concerned with Immigrants and Refugees (GCIR), had significant institutional capacity to get financial assistance directly to hard-to-reach immigrant communities. They had developed this infrastructure in response to previous emergencies (namely, the 2017 forest fires in Northern California) and were able to reactivate it to respond to COVID-19. As part of this infrastructure, they had strong relationships with a large network of CBOs which allowed them to quickly assess and mobilize financial support for this program. GCIR benefits from operating in a favorable political landscape, which was not true of all the programs CFI reviewed.

Atlanta tries to establish a program in a difficult political environment with limited support infrastructure.

Even in cities with dedicated departments, staff, resources, and other infrastructure in place to support immigrant communities, some administrators encountered resistance to establishing an immigrant-only program. In Atlanta, located in one of the most anti-immigrant states in the country, it was particularly challenging to stand up a direct cash assistance program to support immigrant

residents. Despite having a dedicated office of immigrant affairs, the city could not disburse funds to these residents directly, given strict state legislation that barred the provision of public benefits (including educational benefits) to undocumented immigrants. Additionally, officials struggled to identify CBOs to partner with, as the city had a limited nonprofit infrastructure overall and even fewer CBOs focused on serving immigrants. One program administrator highlighted the lack of local capacity to support such a cash assistance program, noting, “Our nonprofits are not designed to do this at scale, at all, in any way.”

Chicago emphasizes inclusion in program design choice.

Some cash assistance programs CFI reviewed were designed to serve a wider range of target populations. For instance, the City of Chicago partnered with The Resurrection Project (TRP) to ensure its Chicago Resiliency Fund responded to the findings from an initial COVID-19 assessment which revealed an immense need for cash assistance among a diverse group of constituents, including dependent adults, those experiencing homelessness, and residents reentering society after incarceration. Consequently, they chose to run a program with a wider scope, although this ultimately created a higher administrative burden because of the additional forms and documents necessary to verify applicant eligibility.

3

Eligibility Criteria



Background

After determining who to target with cash transfers, cities and their partners must establish eligibility criteria which will determine who gets money and why. Based on CFI’s review of cash transfer programs so far, there were three common criteria for establishing eligibility:

- 1) Residency
- 2) Income level
- 3) Ineligibility for CARES Act or other economic relief

Depending on the specific focus of each program, additional eligibility criteria may be warranted. For instance, the cash assistance programs in Chicago and Harris County, Texas, needed verification that beneficiaries have not received money from other relief funds.

Not all eligibility criteria are made public, which is largely a function of other program design choices. For instance, open call programs—those

that source applicants through public outreach campaigns and centrally process documents—necessarily make their information public, but closed application processes rely on CBO relationships within communities to create and apply eligibility criteria. This can increase data protection by helping to obfuscate recipients; however, there is an inherent tradeoff with program transparency. One program administrator in Harris County, Texas, underscored the importance of transparency and clearly defining eligibility criteria to bolster confidence and trust in these programs, especially within the context of the great deal of uncertainty and stress that applicants were facing in light of COVID-19.

The majority of cash assistance programs CFI observed had open applications in which cities and/or the implementing CBO partners openly solicited applications and made specific eligibility criteria available to the public online through dedicated websites, social media channels, and news media outlets.

ASSESS

Open vs. Closed Applications: Open call applications can be easier to administer but require clear, transparent eligibility criteria. This is ideal for programs broadly targeting beneficiaries. Some cities may opt to work through CBOs, which is a good strategy where nonprofit infrastructure is especially strong or when there is a desire to obscure beneficiaries' identities. These closed applications lead to less transparency, however.

Proof of Eligibility: In addition to setting eligibility criteria, cities need to assess what documents they are willing to accept as proof of that eligibility. This is important for members of immigrant communities who may not have a U.S. government-issued identification card. Additionally, it may be more difficult for undocumented immigrant families to provide proof of income. Program administrators will also have to institute protocols to manage these different eligibility requirements.

DESIGN IMPLICATIONS

Onboarding Processes: The decision of whether to have an open or closed application will impact the first stage in a beneficiary onboarding procedure. This design decision is closely linked to the outreach choices a city needs to make. For open applications, mass marketing campaigns are effective at driving potential beneficiaries to the application. Closed applications normally begin through direct CBO outreach and may or may not have centralized onboarding processes.

In Practice

The Chicago Resiliency Fund is an open call application with several eligibility criteria and source document options.

The Chicago Resiliency Fund had a broad set of eligibility criteria given its scope. In addition to the three requirements described above, TRP—the implementing CBO partner—also

included age and no receipt of other relief funds as criteria for approval. TRP provides applicants with a table of documents that they can use to validate these eligibility requirements. To validate whether potential recipients had received other relief funds, program administrators worked with the State of Illinois to set up a data sharing agreement to identify residents who had already received other kinds of aid.

DOCUMENT TYPE	ELIGIBILITY CRITERIA			
	Proof of Identity	Proof of Chicago Residency	Proof of Income	Proof Applicant is Claimed as Dependent
Driver's License, Temporary Visitor's Driver's License (TVDL), State ID		X	X	
City Key ID	X	X		
Consular Identification Card	X	X		
Foreign Passport	X			
Student College ID	X			
2020 Bank Statement		X		
2020 Utility Bill (electric, gas, water, phone, etc.)		X		
Rent, Lease, Mortgage Receipt		X		
Statement from Homeless Shelter			X	
Official Mail Showing Postmark Within the Last 30 Days		X		
Pay Stub with Address		X	X	
2019 W-2		X	X	
2018 or 2019 Tax Statement		X	X	X
Signed Affidavit			X	

New York City relies on a strong CBO network to determine eligibility in a closed application process.

New York City’s decision to have a closed application was part of a conscious effort to build a firewall to prevent the unauthorized access or disclosure of sensitive program information. Referencing learning on data privacy and security from the city’s municipal identification program, administrators emphasized the importance of safeguarding beneficiaries’ privacy. To ensure that, the city contracted with experienced CBOs that had strong ties to undocumented communities and experience handling

sensitive information, including a beneficiary’s immigration status. After creating centralized templates and tools to standardize eligibility determinations and reporting requirements, program managers delegated all outreach and intake functions to the CBO network. Even the program administrators themselves did not know recipients’ identities. This CBO network was also kept anonymous to shield the program from undue scrutiny.¹¹ Taken together, one program administrator noted, “This [prudent approach] is really about getting desperately needed funding to people without compromising privacy and their protection.”

CRAFTING ELIGIBILITY CRITERIA FOR OPEN APPLICATION PROCESSES (continued on next page)

**ANGELENO CAMPAIGN
(Los Angeles, CA)**

“Households must meet all three of the following criteria to be eligible for assistance through the Angeleno Card initiative:

- 1. Residency** Households in the City of Los Angeles;
- 2. Income** Households with total annual incomes that fell below the federal poverty level prior to the COVID-19 crisis; and
- 3. COVID-19 impact on income and/or employment** Households that have fallen into deeper economic hardship during the crisis because at least one household member has lost a job or experienced a reduction in income of at least 50%.”

ⁱⁱ Managers of Connecticut’s 4-CT COVID-19 Relief Fund similarly decided not to publicly name their CBO partners to prevent them from being overwhelmed.

**CHICAGO RESILIENCY FUND
(Chicago, IL)****“In order to qualify for the Chicago Resiliency Fund program, you must:**

1. Ineligibility for CARES stimulus NOT be eligible for a federal stimulus check because you were claimed as a dependent or used an ITIN to file taxes.

2. Residency Be a resident of Chicago and provide proof of Chicago residency.

3. Income Have a household income less than 300% of the poverty level and provide proof of income.

4. Age You must be 18 years of age as of January 1, 2020.

5. Income If you were claimed as a dependent because you are a young adult, your entire household must be a resident of Chicago and have a household income of less than 300% of the poverty level.”

6. Haven’t already received assistance from similar relief funds; immigration status

Haven’t already received support from similar funds (e.g., ICIRR’s COVID-19 Immigrant Family Support Project); cannot receive funding as a foreign national with a visa.*”

* This final criterium was added for the second round of disbursements of the Chicago Resiliency Fund.

**HARRIS COUNTY COVID-19
RELIEF FUND (HCCRF)
(Harris County, TX)****“Eligibility and disbursement guidelines for the Fund include:**

1. COVID-19 impact on income and/or employment Those who have experienced adverse economic impact related to COVID-19; AND are:

2. Income Households below 60% of the Area Median Income (AMI), or are accessing public benefits that already confirm they are very low-income; or

3. Vulnerable population/group status

a. Survivors of domestic violence, or

b. Youth aged out of foster care, or

c. Those in homeless shelters.

4. Haven’t already received assistance from city or county Applicants cannot have received benefits from any City of Houston or other Harris County program administered for the same purpose.

5. Ineligibility for unemployment insurance and/or CARES stimulus and financial need

Prioritized consideration for:

a. Applicants ineligible for unemployment insurance or have applied and will take too long to receive assistance to meet basic needs.

b. Applicants ineligible for CARES Economic Impact Payments, or have not yet received a payment and cannot wait for the assistance to meet basic needs.”

4

Outreach and Onboarding



Outreach

Background

Deciding who to target and establishing eligibility criteria create a framework for understanding which populations a cash transfer program will serve, but implementation really begins with outreach and eventual onboarding.

Generally, the ways in which municipal cash transfer programs conduct outreach is closely linked to their decisions about whether to conduct an open call for applications or not. For those that do, cities typically conduct mass marketing campaigns and partner with media outlets to raise awareness of their program, in addition to partnering with CBOs for on-the-ground outreach. These approaches help to drive as many potential beneficiaries to the program as possible; however, marketing campaigns can be costly and such broad outreach has often highlighted the degree to which demand for aid exceeds supply. In closed application processes, CBOs are the primary channel for awareness

raising, working directly with their constituents. This approach may help CBOs better manage their capacity to execute, as they can control the influx of beneficiaries. However, this approach, by design, is not as broad, which could raise questions about program equity.

Almost every program CFI examined included CBOs, which served as a bridge between government officials and residents. As explored in previous research on municipal identification programs,⁹ many managers understood the importance of working with trusted CBOs to successfully engage with marginalized and vulnerable communities in need and built CBOs into their outreach models and onboarding processes accordingly. For instance, several programs were structured around a lead CBO partner that provided centralized technical infrastructure, standardized procedures for outreach, and general guidance to their network of peer CBOs that engaged directly with applicants.

ASSESS

Mass Marketing: Marketing can be an effective way to let large segments of the population learn about the program, but it can be costly. CFI has seen this approach work well with major programs such as in Los Angeles and New York. It is also a reasonable approach if the CBO infrastructure is not particularly strong. However, it may not be an option for smaller programs.

CBO Capacity: CBOs play an important role in outreach regardless of whether applications are open call or closed to the general public. However, CBOs with limited capacity may struggle to conduct outreach and this should be considered when deciding how to market the program. There were instances in early iterations of programs where CBOs were overwhelmed by the extent of demand in both open and closed applications.

DESIGN IMPLICATIONS

Equity in Onboarding: These outreach approaches have implications for the equity inherent in the program. Closed programs, by definition, tend not to be able to achieve the breadth of outreach of open call programs but may achieve more depth (i.e., getting to the hardest-hit people). Furthermore, given that demand for aid far outstrips supply, successful open applications raise questions about which eligible people get assistance if there is not enough to go around.

In Practice

TRP relies on social media and news coverage to promote its open call application.

In Chicago, TRP served as the lead CBO partner and fiscal agent for the Chicago Resiliency Fund, managing the central application and intake platform and leading a network of over 20 other CBO partners to conduct outreach

and onboarding for the Fund. As part of its outreach efforts, TRP promoted the Fund on social media and held a press conference with the mayor's office to inform its audience about the application process and key deadlines. TRP hosted a dedicated webpage for the Fund on its website, which included responses to common frequently asked questions and provided updated contact information and hours of operation for each CBO partner.

The Mayor's Fund for Los Angeles Leveraged Key Relationships with the Mayor's Office and Other Stakeholders to Promote the Angeleno Campaign



The Angeleno Campaign relies on CBOs to do outreach for its open call application.

The Angeleno Campaign was largely led and administered by city officials and affiliated organizations, which included a great deal of promotion and amplification on social media by the Mayor's Fund for Los Angeles, Accelerator for America, and Los Angeles Mayor Eric Garcetti. However, Los Angeles' network of nonprofit-run FamilySource Centers (FSCs) was the backbone of its community outreach and engagement efforts. The FSCs, located in high-need areas of the city, were already very familiar working with low-income residents and had the requisite expertise and training to do intake of Angeleno Campaign applications, verification of applicants' documents for eligibility determinations, and were able to help troubleshoot applicants' issues with the process along the way, which was especially important, given concerns that there were too many barriers to a fully-digital application for some residents.

Onboarding

Background

The onboarding process is the critical step in which programs conduct eligibility checks for applicants and approve or deny them for cash assistance. Onboarding is arguably the most resource-intensive part of the process, requiring human and information technology resources to organize, review, and approve source documents. To do this successfully, many cities and CBO administrators established centralized databases through which applicants could be tracked. Using platforms like Salesforce, Oracle, and Qualtrics, cash transfer programs created mechanisms for intake, CBO assignment, document upload and approval, and for automatic application status notifications to beneficiaries.

For some programs, onboarding applicants successfully was not a small achievement and required iteration of their processes. Given the immense need for relief, many open application systems—such as those in Chicago, Los Angeles, Harris County, Texas, and Denver—were at risk of being completely overwhelmed. Chicago's TRP received over 200,000 phone calls on the first day that the Chicago Resiliency Fund was opened. Similarly, for the three-day period in which the application period for the Angeleno Campaign was open, administrators received over 450,000 applications, primarily from residents living outside of Los Angeles. To cope with the volume of applications at this scale, open applications typically utilized one of four approaches to

process clients to ensure equitable distribution of funds: first-come, first-served; lottery; allocation; and weighting.

For cash assistance programs with closed application processes, cities typically delegated all outreach and onboarding functions to their partner network of CBOs. CBO partners leveraged their existing relationships with immigrant communities, especially with the undocumented and those living in mixed-status households, to identify beneficiaries to receive funds, whether by working with existing clients or reaching out to new individuals.

GUIDANCE TO CITIES

ASSESS

Potential Demand: Programs with significant demand will undoubtedly outstrip their supply. The degree to which that will occur and the likelihood of being able to offer follow-up funding are important considerations in determining which onboarding approach to use.

IT Capacity: Cities and CBOs with the ability to quickly develop and adopt centralized data management systems have seen meaningful efficiencies in their workflow. Cities should consider whether they have the capacity to stand up a centralized system, and if not, they should examine community partners (such as the organization Connective) that can supplement their support.

GUIDANCE TO CITIES (continued on next page)

ONBOARDING APPROACHES

OPEN APPLICATION PROCESSES

CLOSED APPLICATION PROCESSES

First-come, first-served Lottery/simple randomization

Allocation

Weighted

Targeted Selection

ADVANTAGES

- These approaches are relatively easy for cities and CBOs to execute.
- Cities and CBOs can onboard recipients more quickly than through other approaches.
- First-come, first-served and lottery/simple randomization approaches are relatively easy for cities and CBOs to explain to the public.

Assigning applicants in this way allows cities and CBOs to align the volume of applications (demand) with city and/or CBO capacity (supply).

This approach gives cities and CBOs the opportunity to embed key criteria for better targeting within the application, which can help to advance equity goals.

Closed application processes give these programs greatest degree of privacy for recipients and implementing CBO partners.

ONBOARDING APPROACHES

	OPEN APPLICATION PROCESSES			CLOSED APPLICATION PROCESSES
	First-come, first-served Lottery/simple randomization	Allocation	Weighted	N/A
DISADVANTAGES	For the programs evaluated by CFI that fell into this category, their application processes required, at least in part, that applicants had access to the internet and/or a computer (although these programs provided some support for applicants over the phone). This onboarding approach may bias the selection of applicants towards those with higher levels of education, income, digital fluency, and internet access, among other characteristics, raising equity concerns.	This approach may be more difficult for cities and CBOs to execute and may slow down the speed of onboarding as a result.	This approach may be the most difficult for cities and CBOs to administer and explain to the public.	Closed onboarding (and application) processes rely on the depth of CBOs' ties to the communities they serve. While their expertise is invaluable in reaching undocumented and other marginalized communities, it is unclear who exactly is receiving the cash transfers (e.g., existing CBO clientele versus other eligible residents) and whether these recipients are indeed those who need them the most.
PROGRAMS	<ul style="list-style-type: none"> ➤ Angeleno Campaign (Los Angeles, CA) ➤ Chicago Resiliency Fund (Chicago, IL) 	<ul style="list-style-type: none"> ➤ 4-CT COVID-19 Relief Fund (State of Connecticut) ➤ Harris County COVID-19 Relief Fund (HCCRF) (Harris County, TX) ➤ Left Behind Workers Fund (LBWF) (City and County of Denver, City of Aurora, State of Colorado) 	<ul style="list-style-type: none"> ➤ Harris County COVID-19 Relief Fund (HCCRF) (Harris County, TX) 	<ul style="list-style-type: none"> ➤ Atlanta, GA ➤ New York, NY

In Practice

Los Angeles uses a lottery approach to deal with massive number of applicants.

The Angeleno Campaign—the first major direct cash assistance program with an open application process to launch out of the programs examined by CFI—used a lottery approach to manage the massive number

of applications they received. The Angeleno Campaign received and screened roughly 450,000 applications over three days and identified about 150,000 applicants that met the eligibility criteria. Applicants from that pool were then randomly selected for an eligibility verification appointment. Overall, about 70 percent of eligible applicants scheduled a verification appointment.

Angeleno Campaign Online Applicant Verification System

The Angeleno Campaign found that it was necessary to upgrade their IT infrastructure to manage the demand for relief. After initially using a combination of paper forms and multiple Google spreadsheets for its eligibility verification appointments, program managers shifted to a centralized Oracle and Apex Systems-based platform to manage the application process. Administrators were able to grant different access permissions to staff in order to track users' activity on the system for added data privacy and security, and they had dedicated staff to comb the database to identify any irregularities in data access and use. Applicants submitted an initial prescreening application online¹⁰ that was connected to the database. For those who met the minimum eligibility criteria, the application platform prompted applicants to schedule in-person appointments with the city's FSCs to verify their documentation; applicants could either register by creating an online account requiring an email address or by connecting over the phone through a call center if they did not have internet or email access. Understanding the importance of having human touchpoints during the onboarding process, call center staff would follow up with eligible applicants who had not yet scheduled an appointment, calling them at least three times a day to ensure their applications did not fall through the cracks.

1) Qualified applicant receives email notification.

Qualified applicants are pre-selected, and email notifications are sent en masse via Oracle Service Cloud. Qualified applicants can access the appointment scheduling portal via link in the email notification.

2) Applicant is directed to appointment scheduling portal.

Applicants log into the secure Oracle Service Cloud Platform, which prevents forwarding of the email notification or unauthorized appointment scheduling. The platform's proprietary Intelligent Advisory interview guides applicants through which documents to bring to their in-person eligibility verification appointments.

3) Applicant uploads documents for verification.

Applicants select the documents to prove their residency in Los Angeles, household income, and financial need. They receive a summary and email notification of the selected documents they need to print and bring to their in-person eligibility verification appointment.

4) Applicant schedules in-person eligibility verification appointment.

Applicants select the location, date, and time for their appointment, all of which is confirmed in the platform.

Call center staff would follow up with eligible applicants who had not yet scheduled an appointment, calling them at least three times a day to ensure their applications did not fall through the cracks.

TRP shifts from first-come, first-served to a lottery approach after being overwhelmed with applications.

For the first round of the Chicago Resiliency Fund, applicants applied on a first-come, first-served basis for cash assistance over the phone with TRP and other CBO partners. This created substantial bottlenecks and arguably a great deal of frustration for many applicants, as they had to make multiple calls to complete their applications as TRP and its CBO partners struggled to keep up with the call volume. As the lead administrator and fiscal agent for the Fund, TRP managed a centralized Salesforce system through which all applications—from TRP itself and from the network of over 20 CBOs, each serving slightly different target populations and constituency bases—would be processed. TRP granted login permissions to CBOs, allowing them to collect applicants' documentation to verify their eligibility and upload them into the system before doing a final review to confirm that applicants' documentation matched the information provided in their applications. TRP also notified applicants on the status of their applications via SMS. In the second round of the Chicago Resiliency Fund, however, TRP shifted to an online lottery-based system whereby funds would be randomly allocated to 2,000 households, with one lottery entry (i.e., a pre-screening application) allowed per household. Given the scale of demand it experienced in the first wave, TRP opted for this lottery system as a way to manage its call volume and to keep its CBO partners phone systems from being overwhelmed during the second round of funding.

In Colorado, LBWF manages the supply of CBO resources with applicant demand to limit bottlenecks.

In comparison, the Left Behind Workers Fund (LBWF)—administered by Impact Charitable with financial support from the City and County of Denver, the City of Aurora, and the State of Colorado—processed applications using an approach that took into account the respective capacity constraints of its CBO partners, funneling applications into a centralized database before matching applicants with CBOs to conduct further screening. Applicants could contact outreach organizations directly or dial 311 (in Denver) or 211 (across the rest of the state, through the local United Way affiliate) to get more information about LBWF. Basic contact information collected through 311 and 211 would be uploaded into Impact Charitable's centralized database. LBWF managers then assigned applications to screening organizations that would conduct 10- to 30-minute assessments to evaluate applicants' need using the Qualtrics survey platform. This data would automatically be encrypted and input into the Impact Charitable database, reducing the data management burden on individual CBOs. LBWF managers also had the ability to track all data entry and access on the platform to ensure sensitive applicant information was accessible only to authorized users.

Harris County uses its data platform to assign weighting to applicant criteria to identify those most in need.

In Harris County, Texas, the Greater Houston Community Foundation contracted with Connective—a nonprofit focused on providing comprehensive disaster recovery and preparedness systems to the Texas Gulf Coast Region—to administer the application and onboarding processes for the \$30 million Harris County COVID-19 Relief Fund (HCCRF). Working in concert with a network of over 40 local CBO partners, Connective developed a Salesforce-enabled platform in two weeks, conducted one-on-one needs assessments with each CBO, and held weekly office hours to ensure that CBO partners were comfortable using the intake database and verifying applicants' eligibility.

Once the application period was live, Connective, like the LBWF in Colorado, worked with its local United Way affiliate so that residents could get more information about the Fund by dialing 211. A multilingual call center was also available to assist residents with their applications. Unlike most cash assistance programs, however, HCCRF applicants did not need to provide documentation verifying their residency and household income or proof of enrollment in a public assistance program until after the application process. After Connective matched CBO partners with applicants, there was typically a five-business day turnaround for processing applications, and applicants were notified of the status of their applications via SMS.

Whereas the first tranche of funds was allocated to residents who were already clients of the HCCRF's CBO partners, many of whom were non-English speakers living in the undocumented community, Connective allocated

the second tranche by weighting applications for a more equitable outcome—a decision that was made with feedback from CBO partners and other advocates. It was important to use eligibility criteria (i.e., one's home address) that would not require onerous verification and would ensure that Harris County's historically marginalized communities were being served. Specifically, applications were weighted according to ZIP code and census tract, prioritizing census tracts using the CDC's Social Vulnerability Index,¹¹ residents living in the most vulnerable areas would receive up to a 50 percent increased chance of being selected. For Connective, allocating funds through first-come, first-served models or through simple randomization (e.g., a lottery) were suboptimal methods of allocating funds fairly and equitably.

Atlanta faces a trust problem in its door-to-door outreach and onboarding approach.

In Atlanta, partner CBOs—which operate largely in a hostile political environment—went door-to-door to reach residents in need who were at risk of eviction and assisted them with their applications, which were modeled in part after the intake form for the Angeleno Campaign. Documentary requirements were streamlined, with applicants needing only a notice to vacate from a landlord or rental company to prove their eligibility. During their engagement, however, program administrators received feedback from constituents that underscored the importance of working with trusted organizations (often, ones with brand recognition) that already had relationships with and spoke the language of communities in need, especially in this time of crisis: residents thought the frontline intake workers going door-to-door were trying to defraud rather than help them.

5

Disbursement



Background

To get direct cash assistance into the hands of those in need, program administrators interviewed by CFI made two major decisions: one to determine how public and/or private funds would be channeled through cities, counties, states, and/or CBO partners before being allocated, and another to choose the particular payment method or methods that ultimately disbursed funds to end beneficiaries.

FISCAL AGENTS

While this paper does not examine the impact of public charge in designing these programs in great depth, it is important to highlight that program managers had to determine whether their cash transfers would trigger public charge considerations for immigrant recipients. In short, a public charge test takes place when an individual applies for admission to the United States on a visa or adjustment of their status to that of a lawful permanent resident (i.e., a green card holder); an immigration officer decides whether that individual is likely to become a

“public charge” who is dependent on certain government benefits in the future.¹² To avoid triggering any public charge determinations entirely, program administrators selected fiscal agents through which to channel funds so that they would not flow directly from cities (i.e., public government entities) to residents.^{iii,13} Regardless of whether private contributions or public monies were used to capitalize these funds, most administrators worked with separate nonprofit partners that served as fiscal agents or fiduciaries, adding another level of separation between the direct cash assistance programs themselves and end beneficiaries; no funds were disbursed directly to recipients by a city, county, or state. These fiscal agents were responsible for the fiscal management of all contributions made to these funds. To do this, some programs took advantage of a separate mayor’s fund—a 501(c)(3) nonprofit entity closely aligned with the strategic priorities of a city or mayoral administration that convenes key stakeholders and fundraises for a city’s benefit—for greater ease and flexibility in managing funds.

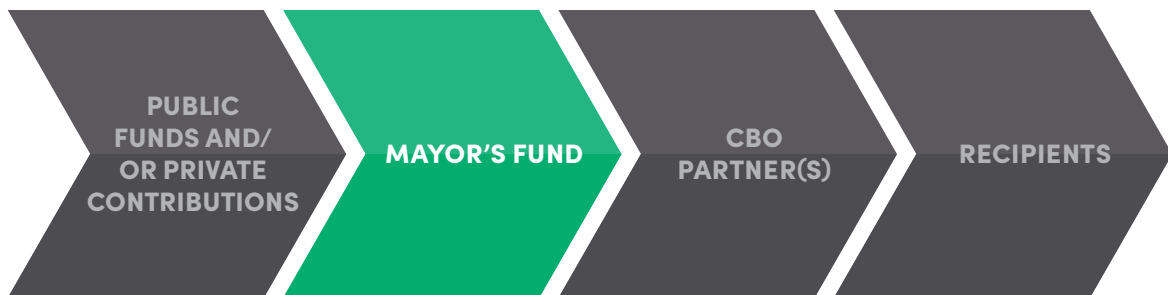
ⁱⁱⁱ A United States district judge for the Southern District of New York ruled on July 29, 2020 that the public charge rule as interpreted and implemented by the Department of Homeland Security’s U.S. Citizenship and Immigration Services (USCIS) may not go into effect as long as there is a declared national health emergency related to COVID-19. However, the Second Circuit Court of Appeals granted a stay on this nationwide injunction on September 11, 2020, meaning that USCIS can now require that applicants for adjustment of status (e.g., some visa and green card applicants) file Form I-944, Declaration of Self-Sufficiency.

Program managers without access to such a vehicle lamented the difficulty in finding the right fiscal agent and would want to consider establishing one in the future to be able to access emergency funds more quickly. Relatively few programs were both administered and fiscally

managed by the same lead CBO. Yet, given its experience launching a rapid relief fund of its own at the start of the coronavirus pandemic,¹⁴ among other qualifications, TRP was well positioned to serve both as the Chicago Resiliency Fund’s fiscal agent and lead CBO partner.

Mapping Pre-Distribution Payment Flows

Mayor’s Fund



In this model, a mayor’s fund—a 501(c)(3) nonprofit entity closely aligned with the strategic priorities of a city or mayoral administration that convenes key stakeholders and fundraises for a city’s benefit—manages both incoming contributions to the cash transfer program and disbursements to end beneficiaries. It can

leverage existing fundraising and payments infrastructure to rapidly get funds to recipients.

Programs: Mayor’s Fund for Los Angeles (Los Angeles, CA), Mayor’s Fund to Advance New York City (New York, NY)

Separate Fiscal Agent



In this model, a separate organization serves as the fiscal agent for the cash transfer program. The fiscal agent often provides fiscal management of contributions made to the program and is sometimes responsible for handling cash disbursements to end beneficiaries. Having a separate fiscal agent may also provide an added degree of separation between the main fund and cash disbursements provided to recipients.

Programs: Community Foundation of Greater Atlanta (Atlanta, GA), Greater Houston Community Foundation (Harris County, TX), Hartford Foundation for Public Giving (4-CT COVID-19 Relief Fund, State of Connecticut), Impact Charitable (City and County of Denver, City of Aurora, State of Colorado), Tides Foundation (California Immigrant Resilience Fund [CIRF])

Lead CBO as Fiscal Agent



In this model, the lead implementing CBO also serves as the fiscal agent for the cash transfer program. This centralization can help reduce the administrative burden of cash disbursement and distribution for CBO partners.

Program: The Resurrection Project (TRP)
(Chicago, IL)

SELECTING METHODS FOR CASH DISTRIBUTION

Equal with the onboarding process, the fund distribution channel to beneficiaries is the most important decision a city can make. Inclusive in that decision is which payment method or methods will best meet recipients' financial needs, access, and capability, and which vendor to work with. With the wide range of populations receiving cash transfers through these initiatives, program administrators had to account for different levels of financial capability and access

in choosing a fund distribution channel. Certain payment methods, such as checks or money orders, may be more accessible for beneficiaries who are unbanked and are more comfortable transacting in cash, while prepaid debit cards may be better for beneficiaries who are already comfortable transacting digitally.

In CFI's review of these programs, we found variation in the quality, flexibility, and cost across and within provider categories (prepaid card providers, financial service providers such as banks or credit unions, money transfer operators, etc.). Generally, for programs with a large network of CBO partners (e.g., 40-plus partners), each serving slightly different constituencies with slightly different needs, administrators allowed funds to be distributed to beneficiaries through a variety of payment methods. For cash assistance programs with smaller CBO partner networks, administrators selected one payment method to distribute funds to its beneficiaries. Of those cities that chose a single distribution method, prepaid debit cards were by far the most common option. Working with commercial payment providers like Usio and OmniCard, cities typically customized prepaid distribution programs to a degree.

The fund distribution channel to beneficiaries is the most important decision a city can make.

ONBOARDING APPROACHES

	ONE PAYMENT METHOD		MIXED PAYMENT METHODS
	Check	Prepaid Debit Card	Other
ADVANTAGES	<ul style="list-style-type: none"> ➤ Checks are easy for CBO partners to administer. ➤ Cities and CBOs can work with local FSPs to waive check-cashing fees for beneficiaries. ➤ Checks are relatively easy for beneficiaries to use and access. 	<ul style="list-style-type: none"> ➤ Usage and transactional data generated by prepaid debit cards can inform program monitoring and evaluation and further engagement efforts; this data may allow for better targeting of residents for follow-on/ wraparound services. ➤ Prepaid cards can be used for online purchases. ➤ They can be registered for certain fraud protections. 	<ul style="list-style-type: none"> ➤ This option gives CBO partners greatest degree of autonomy/flexibility to pick multiple payment channels that meet beneficiaries' needs.
DISADVANTAGES	<ul style="list-style-type: none"> ➤ Check-cashing fees may be passed on to beneficiaries. ➤ Checks provide no usage/ transactional data. 	<ul style="list-style-type: none"> ➤ Fee structure: Prepaid debit cards often charge fees which can eat into the total value of the cash disbursement. Recipients may be charged for ATM withdrawals or per transaction fees. ➤ Beneficiaries cannot always cash out their funds at an ATM. ➤ There are potential privacy risks associated with online registration of these cards. ➤ There is a higher administrative burden for cities and CBOs to load value onto cards. ➤ Typically, higher financial and/ or digital literacy is required for use of these cards. ➤ Wide range of total program costs: Prepaid card program managers charge different fees for different debit card features. There are typically costs for each physical debit card, shipping fees, and fees for activating ATM access, for example. Taken together, these features may drive up the total program costs. 	<ul style="list-style-type: none"> ➤ Equity issues: Cities and CBOs need to be mindful of the impact of providing similar cash transfers to similar recipients using different payment methods. Each payment method has its own advantages and disadvantages (in terms of fee structures, ease of use and accessibility, etc.) that should be taken into consideration. ➤ This option may provide no usage/transactional data. ➤ Money orders are cumbersome: Cities and CBOs need to purchase individual money orders, then send unique money order numbers and instructions for redemption to beneficiaries; recipients may need to go to an in-person retail location to access their funds.

ONBOARDING APPROACHES

	ONE PAYMENT METHOD		MIXED PAYMENT METHODS
	Check	Prepaid Debit Card	Other
PROGRAMS	Chicago Resiliency Fund (Chicago, IL)	<ul style="list-style-type: none"> ➤ 4-CT COVID-19 Relief Fund (State of Connecticut) ➤ Angeleno Campaign (Los Angeles, CA) ➤ Atlanta, GA ➤ New York, NY 	<ul style="list-style-type: none"> ➤ California Immigrant Resilience Fund (CIRF) (California) ➤ Harris County COVID-19 Relief Fund (HCCRF) (Harris County, TX) ➤ Left Behind Workers Fund (LBWF) (City and County of Denver, City of Aurora, State of Colorado)

In Practice

GCIR extends flexibility to its CBO partners and end beneficiaries by offering different distribution methods.

Managers of the California Immigrant Resilience Fund (CIRF)—comprising nearly 60 local nonprofit organizations located in eight regions across the state—did not prescribe how their partners should disburse their funds, but they worked with a prepaid card manager to provide non-reloadable prepaid debit cards to beneficiaries. Approximately 60 percent of CIRF’s partners disbursed funds via check, sending them directly to recipients’ homes in order to reduce the amount of in-person pickup, and around 90 percent of those partners (GCIR included) leveraged existing relationships with local FSPs to ensure that beneficiaries could cash their checks without incurring any fees. A few CIRF partners disbursed funds to recipients through gift cards with local retailers for groceries and other essential purchases, although this option put CBOs at risk of theft by having valuable gift cards in their offices.

LBWF offers different distribution options depending on beneficiaries’ integration with the formal financial system.

Working in coordination with a partner CBO, managers of Colorado’s Left Behind Workers Fund (LBWF) disbursed cash assistance using

two channels to accommodate the needs of banked and unbanked beneficiaries. For banked beneficiaries (approximately half of all beneficiaries), the process was relatively straightforward: in coordination with its payment distribution partner, LBWF did ACH transfers twice a week with a local FSP, and recipients were notified of the transfer via SMS. For unbanked beneficiaries, however, the process was much more convoluted and had several disadvantages. LBWF purchased money orders through a money transfer operator (MTO) to ensure that recipients could collect their payments from any one of the MTO’s outlets and use a wide range of foreign IDs (as many FSPs will only accept U.S. government-issued forms of identification), but encountered many roadblocks to quickly getting funds to beneficiaries. Notably, the MTO’s IT systems often failed during the first few months of the program and did not support API-mediated^{iv, 15} transactions or tracking, requiring LBWF to use much more human resources than would otherwise be necessary. In addition, for each money order, LBWF received a unique number from the MTO that it would then send via SMS to the recipient with instructions detailing how to access the funds. These challenges have made the LBWF difficult to scale.

^{iv} APIs—or application programming interfaces—allow software programs to “talk” with one another and help enable a wide range of products and services, such as digital payments, e-commerce, ride-hailing apps, and open banking.

TRP relies on its experience to choose a single distribution channel: mailed checks.

Drawing from its experience working with immigrant and unbanked communities, TRP—the manager of the Chicago Resiliency Fund—issued and mailed checks directly to recipients. TRP chose checks over other payment methods to account for beneficiaries’ differing levels of financial and digital literacy and because it was administratively easy to issue checks relative to engaging with a prepaid card issuer, for example. It also leveraged its existing relationships with local FSP partners to waive check cashing fees at select locations.

The Angeleno Campaign partners with Mastercard’s City Possible program to access prepaid card vendors.

The Angeleno Campaign partnered with Mastercard to issue prepaid debit cards through its City Possible network.¹⁶ A separate prepaid card program manager shipped the cards in bulk to the city of Los Angeles, which in turn distributed the cards to its FamilySource Centers (FSCs). After completing the intake process with eligible applicants, FSC staff would send the prepaid card manager a report from the Oracle platform with beneficiary names, unique card IDs, and the specific amounts to be loaded to each card. Funds would be loaded to the cards within 48 hours, and beneficiaries could activate their cards over the phone after picking them up in person at the nearest FSC. If a recipient lost or misplaced their card, program administrators could direct the prepaid card program manager to reissue a replacement card.

4-CT in Connecticut partners with health centers to deliver prepaid cards and health information at the same time.

In Connecticut, managers of the 4-CT COVID-19 Relief Fund partnered with CBOs and community health centers (CHCs) to allocate and distribute

prepaid debit cards directly to beneficiaries. After 4-CT administrators purchased and activated the prepaid debit cards in bulk, experienced CBOs embedded in the community would identify priority candidates and write them a “prescription” that included a unique prescription ID number and the specific CHC location to pick up the card in person. CHCs would schedule an appointment with the prescription recipient, verify the unique prescription ID against a master list, and record that the prescription was distributed once the card was picked up. CHCs then updated the master list with the corresponding card serial numbers so that the correct value of funds (either \$200 or \$400, based on comparative need) were loaded onto the cards that were distributed. 4-CT beneficiaries could use their cards with merchants and at banks and ATMs, but they would need to register their card to make online purchases.

New York City negotiated disclaimer language for the online card registration portal.

Managers of New York City’s cash assistance program also worked with a prepaid card manager to disburse funds to recipients. The prepaid card manager mailed the anonymous prepaid gift cards to the city’s network of CBO partners in separate shipments, with CBOs then loading the appropriate value to each card and activating them in bulk before mailing them directly to recipients. As an added data protection and privacy measure, program administrators requested that the prepaid card manager add disclaimer language to its online portal informing recipients of the potential risks of voluntarily registering their cards (e.g., to use for online shopping, for fraud protection benefits), which would require providing one’s name and email address, and potentially one’s home address and phone number.

6

Looking Ahead

At the time CFI conducted interviews with program administrators, they were establishing their first iteration of these cash assistance programs with a focus on getting cash to constituents as quickly as possible to meet their short-term needs. Early versions of the programs inspired subsequent iterations culminating in much of the learning that is in this paper, including how to centrally structure and administer these programs to maximize their efficiency and impact. Additionally, as programs using prepaid cards have distributed funds, program managers have been able to see aggregated, anonymized usage and transaction data. This has been helpful for cities thinking about how to iterate these programs in the future.

For instance, using anonymized and aggregated data provided by payment providers, program managers could analyze spending patterns—including specific transaction categories, vendors or retailers, and amounts—and match those against demographic information to better understand how certain subsegments of beneficiaries were utilizing the funds. Administrators of the Angeleno Campaign found that most recipients were using their cards to purchase food and clothing and to pay for utilities and other bills. Data on registration rates aided program managers in identifying and troubleshooting issues recipients might have had in accessing their funds, such as elderly participants having issues setting up and remembering PIN codes, for example.

The implementation of these programs also revealed other challenges and opportunities. In Atlanta, program managers were asked by recipients for financial advice on how to best prioritize their spending needs, which they unfortunately could not answer, given restrictions on city and state employees from providing such public educational benefits to immigrant and undocumented residents. In Chicago, TRP used the application process to promote connections between beneficiaries and the formal financial system. TRP encouraged CBO

partners to engage unbanked clients on the benefits of opening a bank account and connect them with local credit unions and banks that were already in their communities and deeply familiar with their financial needs. As part of a follow-up survey, TRP included optional fields that asked beneficiaries about whether they had a bank account, whether they were renters or homeowners, and whether they would be interested in financial literacy training to identify potential targets for their in-house financial education and literacy programming.

Administrators often acknowledged the immense need for assistance in their communities and the likelihood of a long economic recovery ahead. Some program administrators—including those with the Angeleno Campaign, LBWF, and the Chicago Resiliency Fund—have stopped their unconditional cash assistance programs in favor of housing and rental assistance programs.

In the long term, direct cash assistance program administrators had differing views on the potential of their programs to turn into long-term infrastructure that could serve residents' (particularly undocumented immigrants) acute and chronic social support needs. Grantmakers Concerned with Immigrants and Refugees (GCIR) reactivated infrastructure for the California Immigrant Resilience Fund (CIRF) it had initially created in response to 2017 wildfires in Northern California, but underscored the difficulty it faced in securing funding and donors' lack of understanding of the need for funding administrative and overhead costs in particular. Program managers in Atlanta stressed the lack of nonprofit capacity locally and a need for external advocacy and pressure to draw attention to the lack of resources in the city and the state for immigrant and undocumented populations. Ultimately, key structural barriers, the privatization of public services, and entrenched attitudes about poverty remain significant and persistent barriers to greater resource mobilization and coordination for unconditional cash transfer programs.



Annex: Methodology

CFI began its research with a review of publicly available documentation and gray literature on COVID-19 relief cash assistance programs in the United States. In June and July of 2020, CFI then conducted in-depth, semi-structured interviews

with 12 program administrators representing seven such programs. In addition, CFI collected information on other cash assistance initiatives affiliated with Accelerator for America's Angeleno Card expansion,¹⁷ involving 10 additional communities in the U.S.

INTERVIEWEES

PROGRAM AND LOCATION

ORGANIZATION(S)

Angeleno Campaign
Los Angeles, CA

Office of the Mayor of Los Angeles
➤ Mary Hodge, Chief of Operations

Atlanta, GA

Mayor's Office of Immigrant Affairs/Welcoming Atlanta
➤ Michelle Maziar, Director
➤ Luisa Cardona, Deputy Director

California Immigrant Resilience Fund (CIRF)
California

Grantmakers Concerned with Immigrants and Refugees (GCIR)
➤ Harmony Hayes, Vice President of Operations

COVID-19 Emergency Relief Fund
New York, NY

Mayor's Office of Immigrant Affairs (MOIA)
➤ Sonia Lin, Deputy Commissioner and General Counsel

Mayor's Office of Operations
➤ Laura Negrón, General Counsel and Chief Privacy Officer

Chicago Resiliency Fund
Chicago, IL

Office of New Americans (ONA), City of Chicago Mayor's Office
➤ Nubia Willman, Director

The Resurrection Project (TRP)
➤ Eréndira (Ere) Rendón, Vice President, Immigrant Advocacy and Defense Project
➤ Elizabeth (Liz) Rosas-Landa, Vice President, Information Technology

Harris County COVID-19 Relief Fund (HCCRF)
Harris County, TX

Connective
➤ Elena White, Executive Director

Left Behind Workers Fund (LBWF)
City and County of Denver,
City of Aurora, State of Colorado

➤ Mark Newhouse, Co-Founder, Left Behind Workers Fund
➤ Ben Newhouse, Tech Lead, Left Behind Workers Fund

COVID-19 DIRECT CASH ASSISTANCE PROGRAMS (continued on next page)

PROGRAM	KEY STAKEHOLDER(S)	TOTAL FUNDING AND DISBURSEMENT AMOUNTS	AMOUNT DISTRIBUTED PER INDIVIDUAL OR HOUSEHOLD	METHOD(S) OF DISTRIBUTION
4-CT COVID-19 RELIEF FUND	4-CT, Hartford Foundation for Public Giving; Accelerator for America; CBO and CHC partners	Disbursement Total: \$807,886 (as of September 14, 2020)	\$200 or \$400 per individual	Prepaid debit cards
ANGELENO CAMPAIGN	Office of the Mayor of Los Angeles, Accelerator for America, Mayor's Fund for Los Angeles, Mastercard City Possible, FamilySource Centers (FSCs)	\$30 million (as of August 12, 2020)	<ul style="list-style-type: none"> ➤ \$700 (1-2 person household) ➤ \$1,100 (3-4 person household) ➤ \$1,500 (5+ person household) 	Prepaid debit cards
ATLANTA	Mayor's Office of Immigrant Affairs, Community Foundation of Greater Atlanta, CBO partners	\$750,000	\$1,300 per household	Prepaid debit cards
CALIFORNIA IMMIGRANT RESILIENCE FUND (CIRF)	Grantmakers Concerned with Immigrants and Refugees (GCIR), CBO (distribution) partners	Funding Total: \$46.9 million raised (goal = \$50 million) (as of September 14, 2020)	\$500 per individual (up to \$1,500 per household)	<ul style="list-style-type: none"> ➤ Checks (issued by CBO distribution partners) ➤ Prepaid debit cards ➤ Other retail gift cards
		Disbursement Total: \$41 million (as of September 17, 2020) (to CBO partners)		
COVID-19 EMERGENCY RELIEF FUND	Mayor's Fund to Advance New York City, Mayor's Office of Immigrant Affairs (MOIA), CBO partners	\$20 million	<ul style="list-style-type: none"> ➤ \$400 per individual ➤ \$800 for a couple or single parent with children ➤ \$1,000 for family with multiple adults and children Increased additional supports where identified	Prepaid debit cards

COVID-19 DIRECT CASH ASSISTANCE PROGRAMS (continued from previous page)

PROGRAM	KEY STAKEHOLDER(S)	TOTAL FUNDING AND DISBURSEMENT AMOUNTS	AMOUNT DISTRIBUTED PER INDIVIDUAL OR HOUSEHOLD	METHOD(S) OF DISTRIBUTION
CHICAGO RESILIENCY FUND	The Resurrection Project (TRP), Office of New Americans (City of Chicago Mayor's Office), CBO partners, FSP partners	\$5 million	\$1,000 per household	Checks (issued and mailed directly to recipients by TRP)
HARRIS COUNTY COVID-19 RELIEF FUND (HCCRF)	Connective, Greater Houston Community Foundation (GHCF), CBO partners	Funding Total: \$14,999,390 (as of August 17, 2020) <hr/> Disbursement Total: \$12,471,600 (as of September 2, 2020)	↗ \$1,200 (1-4 person household) ↗ \$1,500 (5+ person household)	Mixed (unspecified)
LEFT BEHIND WORKERS FUND (LBWF)	Impact Charitable, Colorado Immigrant Rights Coalition (CIRC), Village Exchange Center, SVP Denver, Mile High United Way, City and County of Denver, City of Aurora, State of Colorado	Funding Total: \$6+ million raised or pledged (as of August 8, 2020) <hr/> Disbursement Total: \$3.5+ million (as of July 17, 2020)	\$1,000 per individual	ACH transfers for banked recipients; money transfers for unbanked recipients

Guiding Research Questions

Building on lessons learned from prior research on municipal identification programs and cities' early experiences since the start of the pandemic, the following research questions aim to unpack how cash-based assistance programs for COVID-19 relief develop over time and help identify the subsequent challenges and opportunities that cities and implementing CBO partners face in designing and executing these programs. These questions may assist cities in thinking through how their cash transfer programs can be leveraged for broader inclusion efforts in the future.

- 1) Translating best practices in cash-based assistance to the municipal context
 - a) What are the best practices from the humanitarian cash-based assistance space that can inform cities' efforts in the U.S. (e.g., partnering with CBOs, culturally sensitive products, in-kind versus cash assistance analysis)?
 - b) What are the particular challenges and benefits of city governments stepping into the ring on cash assistance (as opposed to NGOs/nonprofits, state/national governments, other agencies)?
- 2) Understanding the privacy and data protection implications of city cash-based assistance programs—from data collection, data management and storage, challenges to privacy, and risks on impacted—for best practice sharing between cities
 - a) What are the data protection concerns raised by cash-based assistance programs in cities? How does this differ based on how target beneficiary groups are defined?
 - b) How are cities grappling with these questions? Have they considered these risks, and if so, how?
 - c) What data needs to be collected to satisfy fraud concerns? Who should collect it? How should it be stored?
 - d) How can citizenship status be exposed by data collected for cash assistance programs (e.g., asking for information that approximates citizenship status)? How can the immigration status of beneficiaries be protected?
 - e) What are the ways that beneficiary data could be accessed by immigration enforcement actors (e.g., via third party vendors, unintentional data sharing, subpoena)? How can this be prevented (e.g., firewalled data storage, etc.)?
 - f) How can cities protect data from hacking?
 - g) What role do nonprofits and service providers have in protecting data? Are there liabilities to having these organizations collect information? What information are they collecting? How and for how long?
- 3) Linking today's emergency interventions with broader inclusion efforts
 - a) How can emergency cash assistance programs be linked to broader financial inclusion efforts in cities?
 - b) How can these platforms serve as a basis for other services (e.g., portable benefits, unemployment insurance [UI], rental assistance payments, food vouchers and other types of direct assistance, universal basic income [UBI])?
 - c) What new roles and services can cities undertake to create a more inclusive future?



Notes

- 1 Board of Governors of the Federal Reserve System, "Update on the Economic Well-Being of U.S. Households: July 2020 Results," *Report on the Economic Well-Being of U.S. Households (SHED)*, last updated September 23, 2020, <https://www.federalreserve.gov/publications/2020-update-economic-well-being-of-us-households-overall-financial-security.htm>
- 2 National Immigration Law Center (NILC), "Frequently Asked Questions: Eligibility for Assistance Based on Immigration Status," May 5, 2020, <https://www.nilc.org/resources-covid19-crisis-and-consequences/faq-eligibility-for-assistance-based-on-immigration-status/>
- 3 Caitlin Dickerson, "Married to an Undocumented Immigrant? You May Not Get a Stimulus Check," *New York Times*, April 28, 2020, <https://www.nytimes.com/2020/04/28/us/coronavirus-undocumented-immigrants-stimulus.html>
- 4 Accelerator for America, "Release: Accelerator/Mastercard Create 'Cash' Assistance Model for Cities," <https://www.acceleratorforamerica.org/news/release-acceleratormastercard-create-cash-assistance-model-for-cities>
- 5 Vivian Graubard, Nikki Zeichner, and Cassandra Robertson, *Establishing Emergency Cash Assistance Programs: Lessons from the Field*, in partnership with the National Domestic Workers Alliance, New America, July 7, 2020, <https://www.newamerica.org/public-interest-technology/reports/establishing-emergency-cash-assistance-funds/>; National Domestic Workers Alliance, "National Domestic Workers Alliance Launches Coronavirus Care Fund to Raise \$4 Million for Domestic Workers," March 16, 2020, <https://www.domesticworkers.org/release/national-domestic-workers-alliance-launches-coronavirus-care-fund-raise-4-million-domestic>; Sheida Isabel Elmi and Rachel Black, "Cash Transfers in the U.S. are Exploding: Here's How to Make them Effective, During COVID-19 and Beyond," *Next Billion*, June 18, 2020, <https://nextbillion.net/effective-cash-transfers-us-covid19/>; Family Independence Initiative, "Why We Need Cash Transfers in Response to COVID-19," March 19, 2020, <https://www.fii.org/why-we-need-cash-transfers-in-response-to-covid-19/>; Aspen Institute, "Cash Infusions: Stability now, Security Later," May 13, 2020, <https://www.aspeninstitute.org/events/cash-infusions/>
- 6 GiveDirectly, "Research on Cash Transfers: Overview of the evidence," <https://www.givedirectly.org/research-on-cash-transfers/>; Alan Gelb and Anit Mukherjee, "Digital Technology to Scale Up COVID-19 Social Assistance: What Have We Learned?" Center for Global Development, September 3, 2020, <https://www.cgdev.org/blog/digital-technology-scale-covid-19-social-assistance-what-have-we-learned>; Larry Reed, "Searching for Positive Deviants," Center for Financial Inclusion at Accion, May 20, 2019, <https://www.centerforfinancialinclusion.org/searching-for-positive-deviants>; Guy Stuart, *Government to Person Transfers: Is G2P an On-Ramp to Financial Inclusion?* Center for Financial Inclusion at Accion, October 2, 2016, <https://www.centerforfinancialinclusion.org/government-to-person-transfers>
- 7 Financial Security Program and Sheida Isabel Elmi, *Guaranteed Income and Cash Infusions: A Three-Part Series*, Aspen Institute, April 21, 2020, <https://www.aspeninstitute.org/publications/guaranteedincome/>; Sheida Elmi, *Guaranteed Income and Other Cash Infusions: A Review of the Evidence (Part One of Three)*, Aspen Institute, April 2020, https://assets.aspeninstitute.org/content/uploads/2020/04/Cash-Infusions_ReviewofEvidence.pdf?_ga=2.7419378.1571186180.1588597954-124253781.1563375008; Stockton Economic Empowerment Demonstration, "Key Findings," December 2019, <https://seed.sworps.tennessee.edu/docs/Key-Findings.pdf>; *Mayors for a Guaranteed Income*, <https://www.mayorsforagi.org/>
- 8 Internal Revenue Service, "Individual Taxpayer Identification Number," <https://www.irs.gov/individuals/individual-taxpayer-identification-number>
- 9 Tess Johnson and Eric Noggle, *Municipal IDs Offer Cities Lessons for COVID-19 Cash Assistance Programs*, Center for Financial Inclusion at Accion, July 20, 2020, <https://www.centerforfinancialinclusion.org/municipal-ids-offer-cities-lessons-for-covid-19-cash-assistance-programs>
- 10 City of Los Angeles, "City of Los Angeles Angeleno Card," https://docs.google.com/forms/d/1v1vwZSyAOQYMUvo4fQaHuKlji0tjWvkmUFqU_xIeeqs/prefill

-
- 11** Harris County COVID-19 Relief Fund, “COVID-19 Financial Assistance Dashboard,” last updated September 17, 2020, <https://www.harriscountyrelief.org/data>
- 12** For more detailed information on public charge and related issues, see <https://www.ilrc.org/public-charge>; <https://www.ilrc.org/overview-public-charge-and-benefits-march-2020>; <https://www.nilc.org/resources-covid19-crisis-and-consequences/>; https://lawyersalliance.org/userFiles/uploads/legal_alerts/Providing_Disaster_Relief_During_the_COVID_Crisis_FAQs_April_2020.pdf; <https://www.irs.gov/pub/irs-pdf/p3833.pdf>
- 13** Lisa Soronen, “Public Charge Rule No Longer in Effect Until the End of COVID-19,” National League of Cities, August 7, 2020, <https://www.nlc.org/article/2020/08/07/public-charge-rule-no-longer-in-effect-until-the-end-of-covid-19/>; Free Law Project, “State of New York v. United States Department of Homeland Security, Order on Motion for Preliminary Injunction AND Order on Motion to Dismiss AND Order on Motion to Dismiss— Document #195,” *CourtListener*, <https://www.courtlistener.com/docket/16079685/195/state-of-new-york-v-united-states-department-of-homeland-security/>; “Immigration and Public Charge: Rule Suspended During Pandemic,” National Conference of State Legislatures (NCSL), August 5, 2020, <https://www.ncsl.org/research/immigration/immigration-and-public-charge-dhs-proposes-new-definition.aspx>; “Featured Issue: Public Charge Changes at USCIS, DOJ, and DOS,” American Immigration Lawyers Association (AILA), September 22, 2020, <https://www.aila.org/advo-media/issues/all/public-charge-changes-at-uscis-doj-and-dos>
- 14** ABC News, “Getting federal aid challenging for many undocumented workers,” May 23, 2020, <https://abcnews.go.com/Nightline/video/federal-aid-challenging-undocumented-workers-70847171>
- 15** CGAP, “Open APIs for Digital Finance: Introduction to open APIs for digital finance,” <https://www.cgap.org/topics/collections/open-apis>
- 16** Amy Kover, “An #LALOVE Story: How the City Got Aid to Its Most Vulnerable Citizens in Just 8 Days,” *Mastercard Content Exchange*, March 30, 2020, <https://mastercardcontentexchange.com/perspectives/stories/an-lalove-story-how-the-city-got-aid-to-its-most-vulnerable-citizens-in-just-8-days/>
- 17** Accelerator for America, “Accelerator for America to Establish Financial Assistance Programs in 10 U.S. Communities; Announcement Made During John Legend’s Father’s Day Special,” June 21, 2020, <https://www.acceleratorforamerica.org/news/release-10-us-cities-to-offer-direct-financial-assistance>

The Center for Financial Inclusion (CFI) works to advance inclusive financial services for the billions of people who currently lack the financial tools needed to improve their lives and prosper. We leverage partnerships to conduct rigorous research and test promising solutions, and then advocate for evidence-based change. CFI was founded by Accion in 2008 to serve as an independent think tank on inclusive finance.

www.centerforfinancialinclusion.org

@CFI_Accion

CENTER *for*
FINANCIAL
INCLUSION

ACCION