



July 2020

TARGETING FEDERAL FUNDS

Information on
Funding to Areas with
Persistent or High
Poverty

GAO Highlights

Highlights of [GAO-20-518](#), a report to congressional addressees

Why GAO Did This Study

The “10-20-30 formula” has been applied to appropriations for some federal programs since 2009. It requires that agencies use at least 10 percent of designated program funds in counties that have had poverty rates of at least 20 percent over the last 30 years (also known as “persistent-poverty counties”).

Legislation proposed in 2019 (H.R. 2055) would apply the formula to more programs for funds appropriated over the next 10 years. It also would require these programs to increase funding in “high-poverty areas”— census tracts with a poverty rate of at least 20 percent over the last 5 years. GAO identified 247 programs across 14 agencies that may fall within the scope of this bill.

GAO was asked to review federal funding allocated to persistent-poverty counties and high-poverty areas. This report examines (1) characteristics of areas with persistent or high poverty, and (2) the percentage of funds that programs included in H.R. 2055 used in persistent-poverty counties and high-poverty areas in fiscal years 2017-2019.

GAO analyzed Census data and publicly reported federal spending data in USAspending.gov.

View [GAO-20-518](#). For more information, contact William Shear at (202) 512-8678 or shearw@gao.gov.

July 2020

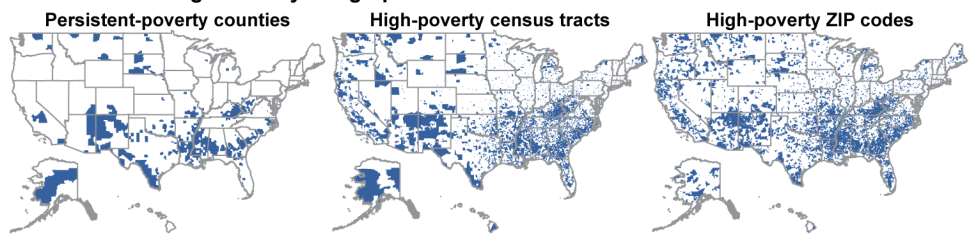
TARGETING FEDERAL FUNDS

Information on Funding to Areas with Persistent or High Poverty

What GAO Found

As of 2017, persistent-poverty counties were predominantly rural and more frequently located in the South than in other regions. GAO identified 409 persistent-poverty counties (13 percent of all counties), roughly 50 percent of which were rural. In contrast, high-poverty census tracts—which represented 28 percent of all census tracts—were frequently urban (74 percent). Publicly reported federal spending data do not include census tracts. GAO determined that ZIP codes were the best available substitute, and 77 percent of high-poverty ZIP codes overlapped with a high-poverty census tract.

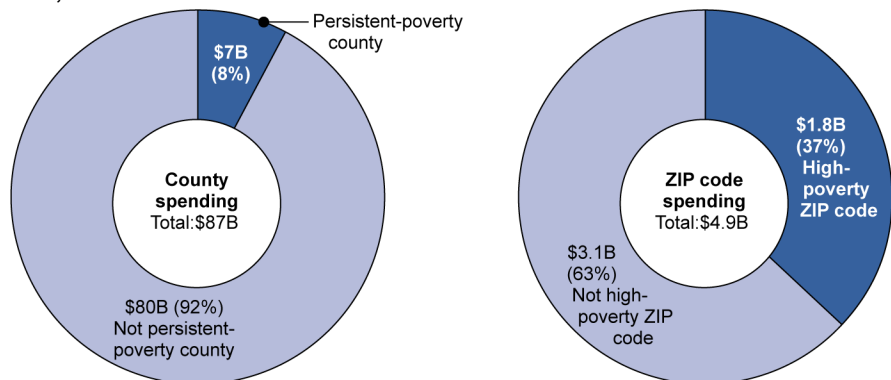
Persistent- and High-Poverty Geographic Areas



Source: GAO analysis of Census data. | GAO-20-518

Of the 247 programs potentially subject to H.R. 2055, 114 (accounting for \$87 billion in spending) had sufficiently complete county-level data in USAspending.gov. In fiscal years 2017–2019, agencies used 8 percent of funds in persistent-poverty counties under these programs (see fig. below). Individual agencies’ funding levels varied, but agencies used less than 10 percent of funding in persistent-poverty counties under 68 programs (60 percent of programs with sufficient data). This included 27 programs that did not have any funds used in these areas. Fewer programs had sufficiently complete ZIP code-level data (46 programs, accounting for \$4.9 billion in spending), but agencies used higher percentages of funds in high-poverty ZIP codes (37 percent) under these programs.

Persistent-Poverty County and High-Poverty ZIP Code Funding for Programs Subject to H.R. 2055, 2017-2019



Source: GAO analysis of Census and USAspending.gov data. | GAO-20-518

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Abbreviations

ACS	American Community Survey
CFDA	Catalog of Federal Domestic Assistance
DATA Act	Digital Accountability and Transparency Act
FFATA	Federal Funding Accountability and Transparency Act of 2006
GSA	General Services Administration
OMB	Office of Management and Budget
SAIPE	Small Area Income and Poverty Estimates
USDA	Department of Agriculture

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July 16, 2020

Congressional Addressees

Research has suggested that geographic areas with poverty rates of 20 percent or higher experience systemic problems, such as higher levels of crime and school dropouts and longer durations of poverty for their residents. Therefore, some policy interventions target funding at the community-level rather than at the individual- or household-level. One example of such a policy is the “10-20-30 formula,” which generally requires federal agencies to use at least 10 percent of funds for certain programs in counties with poverty rates of at least 20 percent over the last 30 years (also known as “persistent-poverty counties”). The formula was first required under the American Recovery and Reinvestment Act of 2009—which applied it to certain appropriations for Rural Development programs in the Department of Agriculture (USDA)—and aimed to target funding to persistent-poverty counties without increasing spending.¹ Recent appropriations laws also have applied the 10-20-30 formula to appropriations for selected programs in the Departments of Commerce and Treasury, and the Environmental Protection Agency.²

A federal bill introduced in April 2019 (H.R. 2055) would, if enacted, expand the group of programs subject to the formula over the next 10 years.³ This proposed legislation further requires federal agencies to increase funding levels for projects in “high-poverty areas,” which are

¹Legislation applying the 10-20-30 formula have used different data sources to determine which counties meet the “persistent-poverty county” threshold. For example, the American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5, 123 Stat. 115, defined persistent-poverty counties as those with poverty rates of at least 20 percent over the previous 30 years as measured by the 1980, 1990, and 2000 decennial censuses, while some provisions of the Consolidated Appropriations Act, 2017, Pub. L. No. 115-31, 131 Stat. 135, also added the 2007–2011 American Community Survey 5-year average. American Recovery and Reinvestment Act of 2009, § 105, 123 Stat. at 127; Consolidated Appropriations Act, 2017, § 750, 131 Stat. at 177.

²Consolidated Appropriations Act, 2017, 131 Stat. at 228, 331, 474; Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, 132 Stat. 348, 444, 540, 667; Consolidated Appropriations Act, 2019, Pub. L. No. 116-6, 133 Stat. 13, 138, 143, 239; Consolidated Appropriations Act, 2020, Pub. L. No. 116-93, 133 Stat. 2317, 2431, 2439 (2019); and Further Consolidated Appropriations Act, 2020, Pub. L. No. 116-94, 133 Stat. 2534, 2720 (2019).

³“An Act Targeting Resources to Communities in Need,” H.R. 2055, 116th Cong. (2019). H.R. 2055, § 3.

defined as census tracts with a poverty rate of at least 20 percent during the prior 5 years.⁴ Specifically, agencies must increase funding by 5 percent of the program’s average total loan and grant funds awarded during the prior three fiscal years and then use at least that increased amount of program funds appropriated over the next ten years in high-poverty areas.

In a provision in the Explanatory Statement related to the Consolidated Appropriations Act, 2020 and a separate letter from the Majority Whip in the House of Representatives, you asked us to determine the extent to which funding for federal programs has been allocated to persistent-poverty counties and high-poverty areas in the three most recent fiscal years.⁵ This report provides information on (1) the location and characteristics of counties and areas with persistent or high poverty and (2) the percentage of program funds used in persistent-poverty counties and high-poverty areas for programs described in H.R. 2055 in fiscal years 2017–2019.⁶

To identify counties with persistent poverty and areas with high poverty, we analyzed U.S. Census, American Community Survey (ACS), and Small Area Income and Poverty Estimates (SAIPE) data. For persistent-poverty counties, we used the 1990 and 2000 decennial censuses and the 2017 SAIPE to identify counties with actual or estimated household poverty rates of 20 percent or higher in all three datasets. For high-poverty areas, we used the 2013–2017 ACS 5-year estimates to identify census tracts and ZIP codes with household poverty rates of at least 20 percent over those years.

To describe the characteristics of persistent-poverty counties and high-poverty census tracts and ZIP codes, we analyzed 2017 ACS data on population, race, and ethnicity and used USDA measures of urban development. We used ACS data to estimate the proportion of county, tract, and ZIP code populations that belonged to a racial or ethnic minority group. We used two USDA measures to determine the proportion of counties, census tracts, and ZIP codes that were “urban,” “suburban,” and “rural.”

⁴H.R. 2055, § 4.

⁵165 Cong. Rec. H10613, H10961 (daily ed. Dec. 17, 2019).

⁶We considered data to be sufficiently complete for the purposes of this analysis if 90 percent or more of observations in a field were present.

To determine the extent to which programs described in H.R. 2055 used funds in persistent-poverty counties and high-poverty areas, we first identified programs that may fall within the scope of the bill. Based on the bill’s definition of “development programs,” we used program and agency-specific documents, the System for Award Management, and other publicly available federal sources to identify relevant programs.⁷ We then matched the programs with their Catalog of Federal Domestic Assistance (CFDA) numbers, which can be tracked in federal spending data.⁸

To calculate the percentage of funds these programs used in persistent-poverty counties and high-poverty areas in fiscal years 2017–2019, we used USASpending.gov data on funding awards, accessed between February and March of 2020. Because of the large number of programs to which H.R. 2055 refers, we relied on publicly reported federal spending data to conduct our analysis and did not consult with the federal agencies that implement these programs to obtain their perspectives or review any additional data sources they may maintain. We plan to conduct future work to examine how some agencies implemented the 10-20-30 formula in the past. We reviewed laws and regulations relevant to the reliability and validity of location-related data elements in USASpending.gov, and spoke with officials from the Department of the Treasury and the General Services Administration (GSA)—the agencies responsible for maintaining prime award data and subaward data, respectively—about their data validation procedures for ensuring data submissions contain required information. Based on these steps, we determined that USASpending.gov data were sufficiently reliable to provide information on the amount of funds agencies have allotted to persistent-poverty counties and high-poverty areas.

⁷The *Assistance Listings* website is available at: <https://beta.sam.gov>. The website is currently in a beta state but it is the official source for assistance listings. The *Assistance Listings* website provides a list of grant, loan, and other financial assistance programs that is independent from Digital Accountability and Transparency Act reporting.

⁸The Catalog of Federal Domestic Assistance (CFDA) was a government-wide compendium of federal programs, projects, services, and activities that provide assistance or benefits to the American public. For each federal award (grant, loan, direct payment, or other form of assistance), the Federal Funding Accountability and Transparency Act of 2006 required federal agencies to report the CFDA number of the federal financial assistance program under which it was made, where applicable. FFATA, § 2(b)(1)(C). The standalone compendium was terminated in 2018, but CFDA numbers were thereafter incorporated in the System for Award Management, *Assistance Listings* website. See Public Law 98-169.

We calculated a program's total funding by summing the total obligations for grants and direct payment awards with the total loan face values for loan awards. We then used location data associated with each award to identify whether the funding was used in one of the persistent-poverty counties or high-poverty ZIP codes we identified. For each program, we calculated the amount of funding used in persistent-poverty counties and high-poverty ZIP codes, as well as the percentage of total program funding used in these areas.⁹ We excluded from our analysis programs that did not have sufficiently complete data on where program funds were used at the county or ZIP code level. We limited our analysis to awards that were both obligated and had a performance period in fiscal years 2017–2019, because awards sometimes can be made in one period and performed in another. For more information on our scope and methodology, see appendix I.

We conducted this performance audit from September 2019 to July 2020 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Data on Poverty Rates in the United States

H.R. 2055 calls for using each of the 1990 and 2000 decennial censuses, as well as the most recent SAIPE, to identify persistent-poverty counties. H.R. 2055 does not specify a data source for use in identifying high-poverty areas, but Congress's request identified the 2013–2017 ACS 5-year estimates.¹⁰ The Census Bureau conducts the decennial census, which is a count of the U.S. population required by the Constitution. In

⁹We did not assess agencies' compliance with statutory 10-20-30 requirements because it was outside the scope of this review. Moreover, the analysis we performed may not accurately reflect an agency's compliance for multiple reasons. For example, the previous 10-20-30 requirements defined persistent-poverty counties using earlier data than those specified in H.R. 2055; therefore, the counties that would have qualified as having persistent poverty may differ from those we identified in this review. Additionally, our work examined individual programs, but statutes sometimes applied the formula to accounts or appropriations that fund multiple programs and activities.

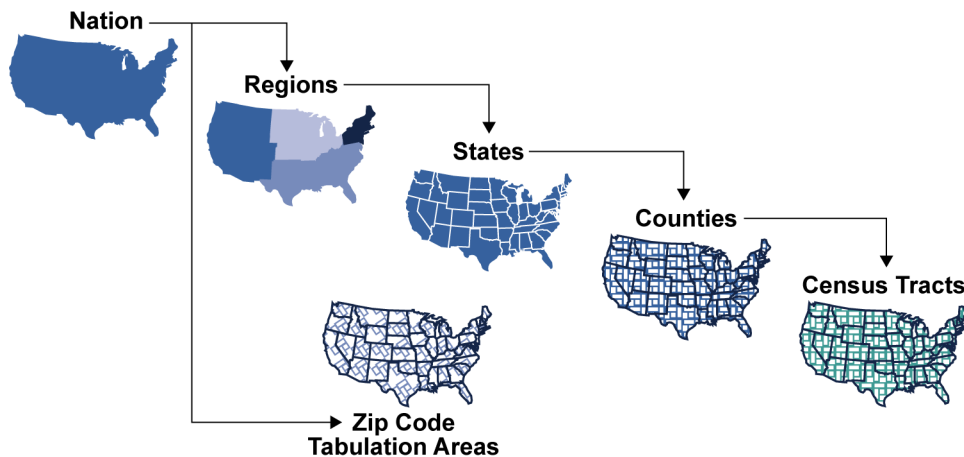
¹⁰As of December 2019, the Census Bureau had published the 2018 SAIPE and the 2014–2018 ACS, but because Congress's request specifies the use of the 2017 SAIPE and the 2013–2017 ACS, we used these earlier datasets in our analysis.

addition, it collects more frequent data through an annual survey of the population through the ACS. The ACS 5-year estimates represent data collected over a period of time and provide a higher level of statistical reliability for less populated areas than single-year ACS estimates. SAIPE provides model-based estimates of income and poverty for school districts, counties, and states, and the Census Bureau publishes it annually.

Geographic Divisions Referenced in H.R. 2055

Although Census Bureau data include many different geographic divisions and subdivisions, H.R. 2055 focuses on counties and census tracts. Counties are established by states and do not have a standard geographic size or population; the number of counties is not evenly distributed across states or regions.¹¹ Census tracts are created to have relatively similar populations, generally from 1,200 to 8,000 people. This means densely populated cities have more and smaller tracts, and rural areas have fewer and larger tracts. Census tracts are a subdivision of counties and thus do not cross county lines (see fig.1).

Figure 1: Hierarchy of Selected Geographic Entities Used by the Census Bureau



Source: GAO adaptation of Census Bureau figure. | GAO-20-518

Our analysis also includes ZIP codes because, as discussed later, they overlap considerably with census tracts and federal spending data can be

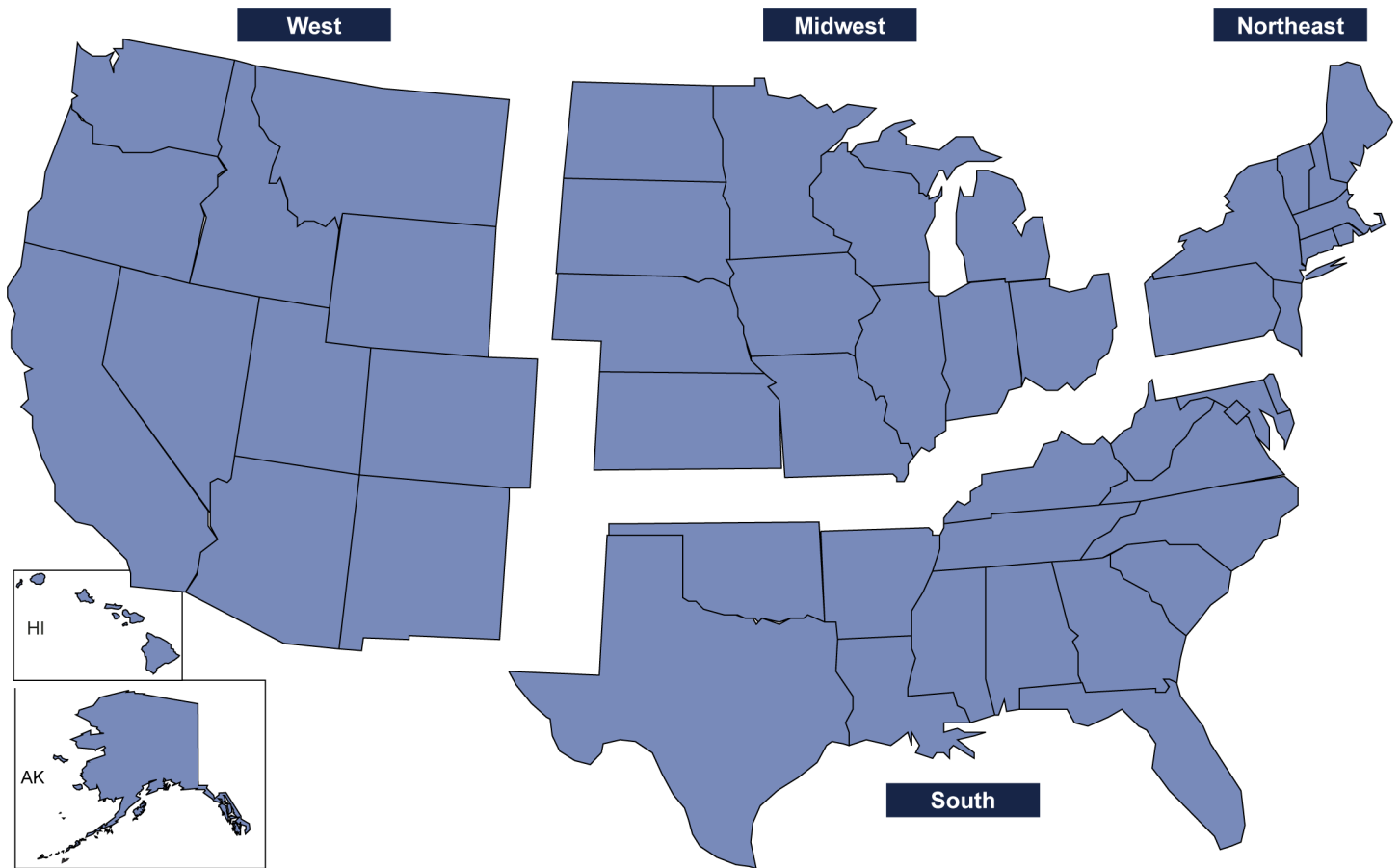
¹¹While most states are divided into counties, some states are divided into parishes or boroughs. Furthermore, some U.S. cities are not legally part of a surrounding county. The Census Bureau treats each of these as county equivalents for statistical purposes. Throughout the report, we use “county” to refer to both counties and county equivalents.

determined at the ZIP code level but not at the census tract level. ZIP codes identify the post office that delivers mail to a set of addresses and may cross census tract and county boundaries.¹²

Finally, at a larger geographic level, the Census Bureau groups states and the District of Columbia into four regions: Northeast, South, Midwest, and West (see fig. 2).

¹²Spending data from USAspending.gov use ZIP codes as an element of primary place of performance. The Census Bureau created ZIP Code Tabulation Areas—which assign a geographic area to each ZIP code—for use with census data. Throughout this report, we use the term ZIP code to refer to both the 5-digit codes and the geographic areas associated with them.

Figure 2: Census Bureau Regions



Sources: GAO adaptation of Census Bureau figure. | GAO-20-518

Programs Subject to H.R. 2055

H.R. 2055 would require “development programs” to meet minimum funding requirements for persistent-poverty counties and high-poverty areas. The bill defines development programs as programs, offices, or appropriations accounts in 34 specified categories.¹³

Based on the definition in H.R. 2055, we identified 247 unique federal programs that may fall within the scope of this bill (H.R. 2055 programs). However, this list should be viewed as illustrative, rather than definitive. Due to the scope of this review, we were not able to determine the exact group of programs that would ultimately be subject to H.R. 2055. For

¹³H.R. 2055, § 2(1).

example, the scope of the development programs subject to H.R. 2055 may depend on interpretation by the implementing agencies, whose views we did not obtain. We also made certain assumptions and applied certain limitations—such as including only programs with a CFDA number—which affected the programs we identified. (See appendix I for more information about our methodology for identifying H.R. 2055 programs.)

The 247 programs we identified fell within nine departments, one agency, and four regional commissions, which we refer to collectively as agencies (see table 1).¹⁴

¹⁴App. III provides a list of the 247 programs we identified based on the definition of “development program” in H.R. 2055. Throughout this report, we use “agencies” to refer collectively to the departments, agencies, and regional commissions that implement H.R. 2055 programs.

Table 1: H.R. 2055 Programs, by Agency

Agency	Implementing bureau or office	Number of H.R. 2055 programs
Department of Agriculture	Rural Development ^a	48
Department of Commerce	Economic Development Administration	8
Department of Education	Office of Innovation and Improvement	1
Environmental Protection Agency	Office of Grants and Debarment	2
Department of Health and Human Services	Health Resources and Services Administration Family and Youth Services Bureau	81
Department of Housing and Urban Development	Office of Fair Housing and Equal Opportunity	2
Department of Justice	Office of Justice Programs Office on Violence Against Women	59
Department of Labor	Employment and Training Administration	25
Department of Transportation	Federal Transit Administration Office of the Secretary	4
Department of the Treasury	Community Development Financial Institutions Fund	5
Regional Commissions ^b	Appalachian Regional Commission Delta Regional Authority Denali Commission Northern Border Regional Commission	12
Total		247

Source: GAO analysis of H.R. 2055, award and grant databases, and other publically available information. | GAO-20-518

Notes: H.R. 2055 would require agencies to use at least 10 percent of funds for “development programs” in persistent-poverty counties and to meet minimum funding levels for high-poverty census tracts. In this analysis, we grouped all Regional Commissions as one “agency” due to their relative size.

^aRural Development includes the Rural Housing Service, Rural Utilities Service, and Rural Business Cooperative Service.

^bH.R. 2055 identified three additional commissions not reflected in the table: the Northern Great Plains Regional Authority, the Southeast Crescent Regional Commission, and the Southwest Border Regional Commission. These commissions have been inactive and thus GAO did not identify any programs they implemented during the period under review.

These programs provided funds through prime awards (grants, direct payments, and loans) and subawards. Prime awards are funds provided directly to recipients, such as state and local governments, federally recognized Indian tribes, private for-profit and nonprofit organizations, and individuals. These recipients may provide services directly to beneficiaries, or they may act as a pass-through, re-disbursing the funds to secondary recipients through subawards using a formula or other process. Of the H.R. 2055 programs with available spending data, about 90 percent provided assistance through grants or direct payments, while

about 10 percent provided assistance through loans or a combination of these. Based on publicly reported data, these programs provided a total of more than \$43 billion in grants and direct payments and roughly \$72 billion in loans in fiscal years 2017–2019 (about \$115 billion in total funding).¹⁵ Of the 183 grant or direct assistance programs with available spending data, 102 (56 percent) also had publicly reported data on subawards, totaling \$12.1 billion in fiscal years 2017–2019.

Data on Where Federal Funds Are Used

Federal transparency laws require agencies to publicly report financial award information on the funds they obligate and expend, including the “primary place of performance” for each award, which they do through USAspending.gov. The Federal Funding Accountability and Transparency Act of 2006 (FFATA) required agencies to report information on federal awards such as contracts, grants, and loans.¹⁶ In 2014, the Digital Accountability and Transparency Act of 2014 (DATA Act) expanded on FFATA by establishing new requirements intended to help policymakers and the public more effectively track federal spending. Specifically, the DATA Act gave the Office of Management and Budget (OMB) and Treasury responsibility for establishing government-wide financial data standards for any federal funds made available to, or expended by, federal agencies. Agencies are required to submit complete and accurate data in compliance with those standards to USAspending.gov, which is maintained by Treasury and has been the official website for reporting under the foregoing laws since 2007.

The primary place of performance data fields in USAspending.gov can be used to identify where the majority of program funds were used, but data are not available at each geographic level for all awards.¹⁷ We previously reported that the primary place of performance data fields are particularly important to achieving the transparency goals envisioned by the DATA Act, because they provide the public with information on where the

¹⁵Because we focused on where funds were used, we assessed the face value of loan awards made, rather than the cost to the government of making those loans, referred to as the credit subsidy cost.

¹⁶Pub. L. No. 109-282, 120 Stat. 1186 (Sept. 26, 2006); Pub. L. No. 113-101, 128 Stat. 1146 (May 9, 2014) (codified at 31 U.S.C. § 6101 note).

¹⁷The DATA Act directed OMB and Treasury to establish data standards to enable the tracking of agency spending. Pub. L. No. 113-101, 128 Stat. 1146 (May 9, 2014).

federal government spends money.¹⁸ For each award, agencies can report the country, state, county, congressional district, and ZIP code as primary place of performance locations, but not the census tract or street address.¹⁹

In some cases, agencies do not report an award's county or ZIP code, for a few potential reasons. First, Treasury officials told us that agencies could leave certain primary place of performance data fields blank for geographies they cannot specify with a single entry.²⁰ This can be the case, as we previously reported, when awards are used in multiple places or over large areas and agencies may not be able to pinpoint a single or precise location for the primary place of performance at a given geographic level.²¹ For example, if an award had numerous performance sites across ZIP codes, none of which represented a majority of awarded funds, the agency could leave the primary place of performance ZIP code blank. Similarly, if a program award was used over a large area that crossed counties, for example to restore a watershed, the agency could leave the primary place of performance county blank. Second, in some cases (such as with direct payments to individuals), agencies cannot report an award's primary place of performance ZIP code or county because doing so could disclose personally identifying information.

USAspending.gov contains information on both prime awards and subawards, but data for prime awards and subawards do not include all of the same data fields. While agencies directly report prime award data to USAspending.gov, prime award recipients report subaward data through

¹⁸See GAO, *DATA Act: OMB, Treasury, and Agencies Need to Improve Completeness and Accuracy of Spending Data and Disclose Limitations*, [GAO-18-138](#) (Washington, D.C.: Nov. 8, 2017).

¹⁹Initial versions of OMB guidance related to the primary place of performance data fields included street address as a required element, but in response to an earlier GAO report, OMB said that this inclusion was made in error. See [GAO-18-138](#). Some federal agencies may document the census tract where program funds are used (or a location that could be used to identify the tract), but assessing data that agencies may keep but do not publicly report was outside the scope of this study. We plan to do a follow-up study on agencies' implementation of the 10-20-30 formula, which will examine any additional data sources that agencies may maintain.

²⁰For each award, agencies are required to specify the appropriate geographic level for the primary place of performance (such as multistate, statewide, countywide, or ZIP code-wide).

²¹See GAO, *DATA Act: Quality of Data Submissions Has Improved but Further Action Is Needed to Disclose Known Data Limitations*, [GAO-20-75](#) (Washington, D.C.: Nov. 8, 2019)

the FFATA Subaward Reporting System, which GSA administers. Because this separate system does not include primary place of performance county information for subawards, these data cannot be used to evaluate the proportion of subaward funds that were used in persistent-poverty counties.

Persistent-Poverty Counties Were Predominantly Rural; High-Poverty Areas Were More Frequently Urban

Persistent-Poverty Counties Were Largely Rural, and Mostly in the South

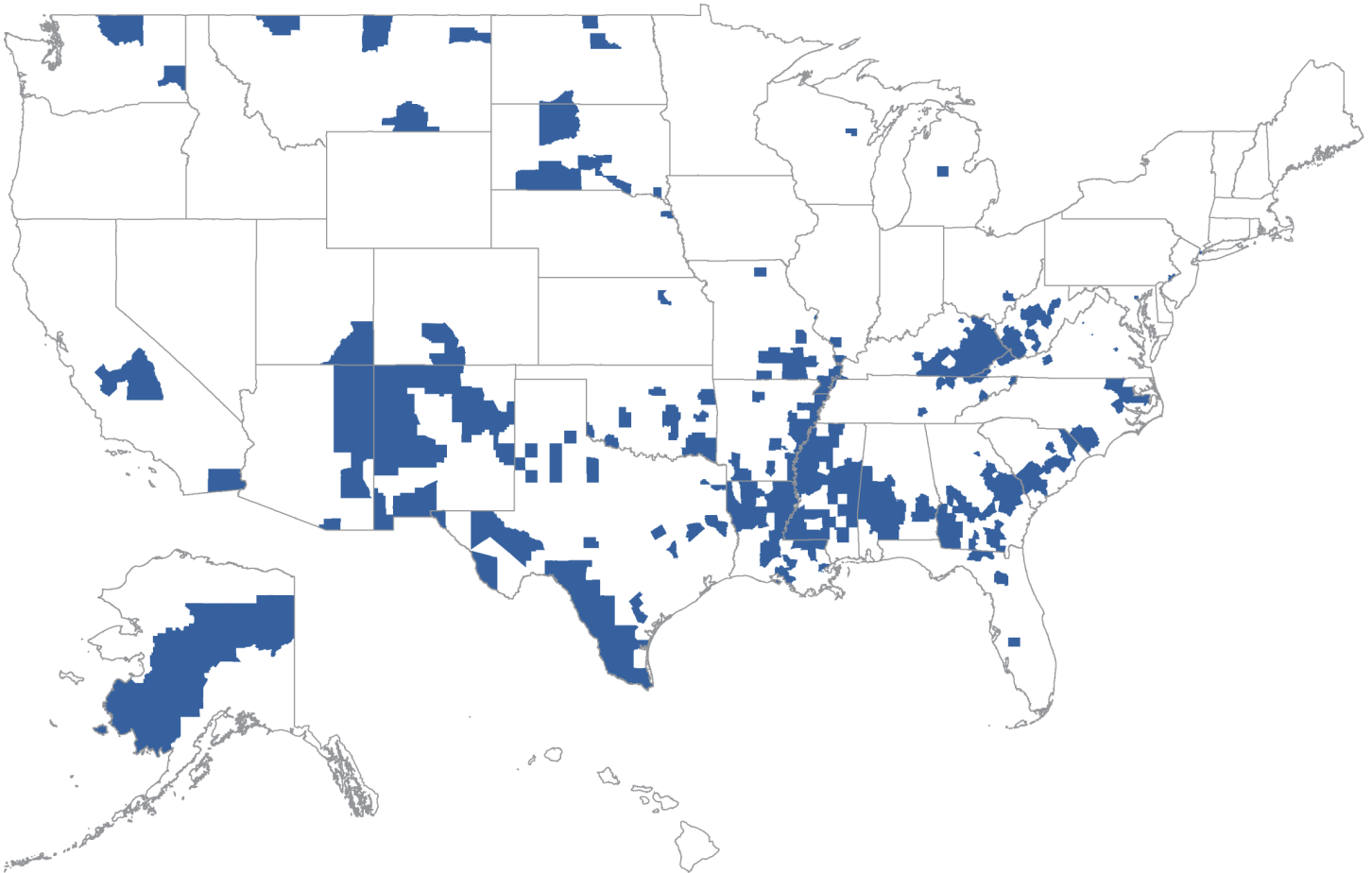
Using the data sets and standards described herein, 409 counties—13 percent of all counties—met the criteria for persistent poverty (see fig. 3).²² Other analyses we reviewed have used different data sets and standards to determine the number of counties with persistent poverty, with results ranging from 382 to 571 counties (from 12 to 18 percent). These differences stem from changes in poverty rates over time, differences in poverty estimates among surveys, and rounding. For example, the Rural Poverty Research Center found about one-third of the 571 counties that met criteria for persistent poverty in 1990 no longer qualified in 2000 because their poverty rates had fallen below 20 percent.²³ The Congressional Research Service found that using SAIPE data rather than ACS data resulted in an average of roughly 28 more persistent-poverty counties in 2011–2017.²⁴

²²We created a confidence interval for the number of counties that qualify as having persistent poverty because the SAIPE poverty rates for each county are estimates with a margin of error. At the 90 percent confidence level, from 403 to 415 counties would qualify as persistent-poverty counties. See app. I for more information on how we created this confidence interval.

²³Kathleen K. Miller and Bruce A. Weber, “Persistent Poverty across the Rural-Urban Continuum,” Rural Poverty Research Center Working Paper, 03-01 (July 2003). The Congressional Research Service examined how the use of data from different surveys and different rounding techniques affected the number of persistent-poverty counties. See Congressional Research Service, *The 10-20-30 Provision: Defining Persistent Poverty Counties*, R45100 (Washington, D.C.: March 2019).

²⁴Congressional Research Service, R45100.

Figure 3: Persistent-Poverty Counties, as of 2017



Source: GAO analysis of Census and Small Area Income and Poverty Estimates data. | GAO-20-518

As of 2017, persistent-poverty counties tended to be rural and concentrated in the South. Using USDA’s Rural-Urban Continuum Codes, which distinguish counties by population size, degree of urbanization, and proximity to a metropolitan area, we found that 50 percent of persistent-poverty counties were rural, compared to 34 percent of counties overall.²⁵ In contrast, 16 percent of persistent-poverty counties were urban, compared to 37 percent of counties overall. The large majority of persistent-poverty counties (81 percent) were located in the South, while the Northeast had only two such counties. (See table 2 for regional and

²⁵We classified counties, census tracts, and ZIP codes as either urban, suburban, or rural. See app. I for more information on our classification methodology.

demographic characteristics of persistent-poverty counties, and appendix II for more detail about their geographic distribution.)

On average, persistent-poverty counties had smaller populations than other counties, and higher shares of their residents belonged to racial or ethnic minority groups. As of the 2010 census, persistent-poverty counties had an average population of about 44,500, compared to an average of about 98,000 for all counties. Thus, while persistent-poverty counties made up 13 percent of all counties, only 6 percent of the U.S. population lived in persistent-poverty counties. Based on estimates from the 2017 ACS, roughly 62 percent of residents in persistent-poverty counties belonged to a racial or ethnic minority group, compared with roughly 37 percent of residents in other counties.²⁶

While persistent-poverty counties had smaller populations on average, 10 had populations of more than 300,000, and two—Bronx County, New York, and Philadelphia County, Pennsylvania—had populations of more than 1 million as of 2010.

High-Poverty Census Tracts Were More Urban, but Are Not Identified in Federal Spending Data

As of 2017, 28 percent of census tracts met the criteria for high poverty.²⁷ The different standards for high and persistent poverty likely account for the higher proportion of high-poverty census tracts, compared with persistent-poverty counties (13 percent). To qualify as high-poverty for purposes of our analysis, a census tract needs only to have had an average poverty rate of at least 20 percent over the last 5 years, rather

²⁶At the 90 percent confidence level, this estimate has a margin of error of plus or minus less than .01 percent. The Census Bureau defines race as a person's self-identification with one or more of the following groups: White, Black or African American, Asian, American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, or some other race. Ethnicity is used to indicate whether a person is of Hispanic origin or not. We considered any person who identified as a race other than White or who identified as Hispanic to be part of a racial or ethnic minority group.

²⁷Using the 2017 ACS 5-year estimates, 20,216 tracts (of 73,056 in total) had high poverty. We created a confidence interval for the number of census tracts that qualify as having high poverty because the 2017 ACS 5-year poverty rates for each census tract are estimates with a margin of error. At the 90 percent confidence level, from 20,109 to 20,323 census tracts met the standards for high poverty.

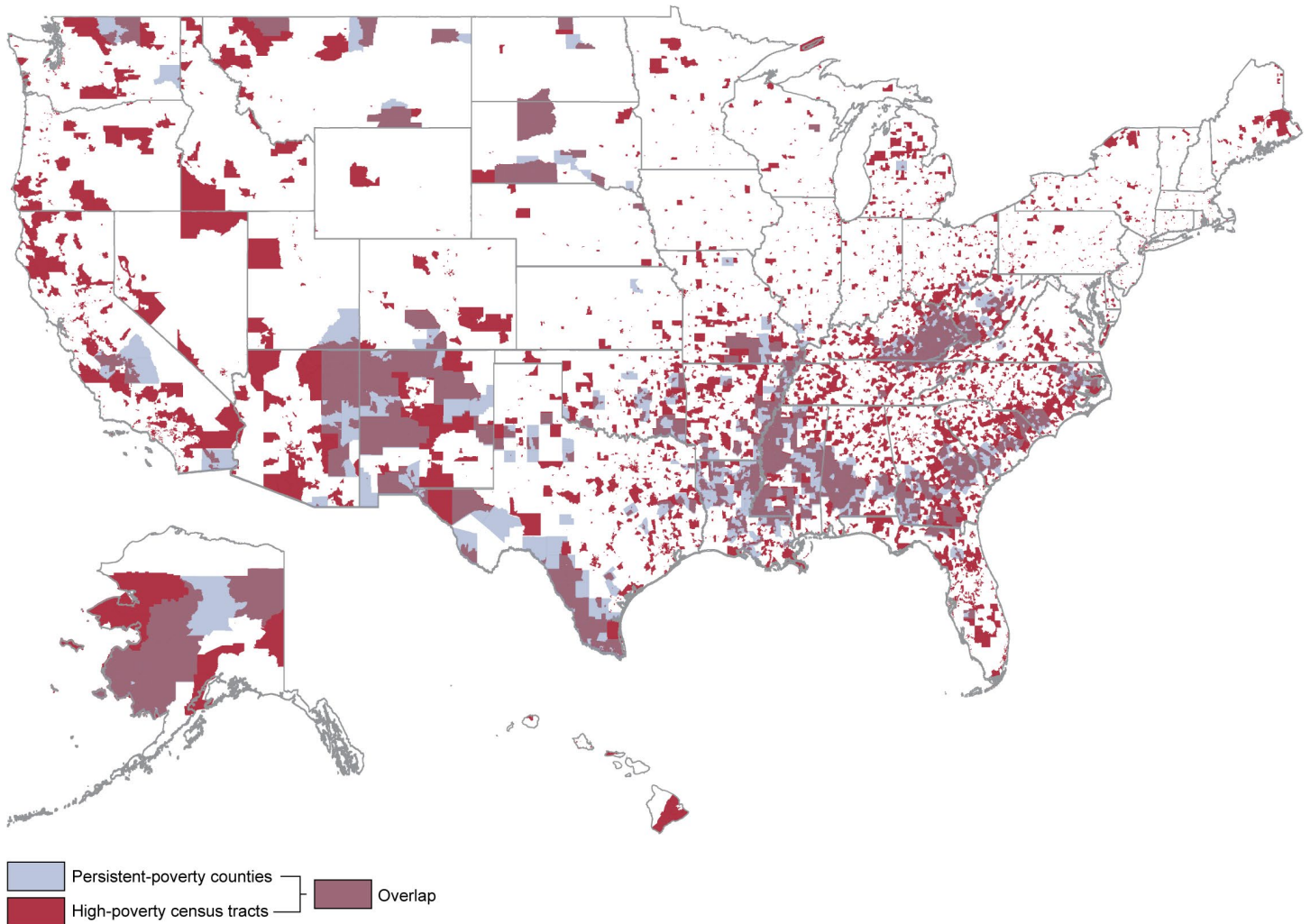
than over multiple 10-year censuses. For comparison, 23 percent of counties met the criteria for high poverty.²⁸

High-poverty census tracts were largely urban and did not tend to overlap with persistent-poverty counties (see fig. 4). Specifically, using USDA's Rural-Urban Commuting Area codes, we found that as of 2017, 74 percent of high-poverty census tracts were located in urban areas, and 15 percent of high-poverty census tracts were located in persistent-poverty counties.²⁹ Therefore, by including high-poverty census tracts in its targeting requirements, H.R. 2055 potentially would direct program spending to areas that would not be included by targeting persistent-poverty counties alone.

²⁸A higher proportion of census tracts than counties met the standards for high poverty because some counties had census tracts within them with high poverty but had an overall poverty rate below 20 percent. As noted earlier, census tracts are subdivisions of counties, which, on average, had much smaller populations.

²⁹The Rural-Urban Commuting Area Codes are based on metrics similar to those for the Rural Urban Continuum Codes but differ in their descriptions and levels of detail. See app. I for more information on how we classified counties, census tracts, and ZIP codes as urban or rural. The high proportion of high-poverty tracts in urban areas is likely due in part to how census tracts are created. Because census tracts are designed to have similar populations, denser urban areas have more and smaller census tracts, while rural areas have fewer and larger tracts.

Figure 4: High-Poverty Census Tracts and Persistent-Poverty Counties, as of 2017



Source: GAO analysis of American Community Survey data and Census and Small Area Income and Poverty Estimates data. | GAO-20-518

High-poverty census tracts were more broadly distributed across U.S. regions than persistent-poverty counties, but they had similar estimated shares of racial and ethnic minority residents. Like persistent-poverty counties, the South had a higher share of high-poverty census tracts than its share of tracts overall—43 percent and 36 percent respectively—but unlike persistent-poverty counties, the majority of high-poverty tracts were located in other regions of the country. (See appendix II for more information on the geographic distribution of high-poverty census tracts.) Based on estimates from the 2017 ACS, roughly 63 percent of residents

in high-poverty census tracts belonged to a racial or ethnic minority group, compared with roughly 32 percent of residents in other tracts.³⁰

FFATA, as amended by the DATA Act, does not require agencies to report the census tract or street address (which could be used to determine the census tract) where funds were used. Therefore, publicly reported data cannot be used to determine the extent to which federal program funds have been used in high-poverty census tracts.

ZIP Codes Are the Best Available Substitute for Census Tracts in Federal Spending Data

We've determined that ZIP codes are the best available substitute for census tracts for analyzing program funds used in high-poverty areas.³¹ Publically reported federal spending data includes an award's country, state, congressional district, county, and ZIP code, to the extent they can be identified. Of these, ZIP codes had the most similar average population to census tracts. In 2010, the average ZIP code population (about 10,000) was roughly twice that of the average census tract (about 4,200). For comparison, the average county population (about 98,000) was more than 20 times higher than the average tract population, and the average congressional district population (about 711,000) was about 170 times higher.

High-poverty ZIP codes were similar to high-poverty census tracts in proportion, location, and demographics. As of 2017, roughly 25 percent of all ZIP codes met the criteria for high poverty, slightly less than the proportion of high-poverty census tracts (28 percent).³² Many high-poverty ZIP codes were located in the same areas as high-poverty census tracts, as 77 percent of these overlapped with at least one high-

³⁰At the 90 percent confidence level, this estimate has a margin of error of plus or minus .05 percent.

³¹While the process the Census Bureau used to create ZIP Code Tabulation Areas involved census blocks and block groups, ZIP Code Tabulation Areas do not necessarily overlap with a single census tract or fit within a single county.

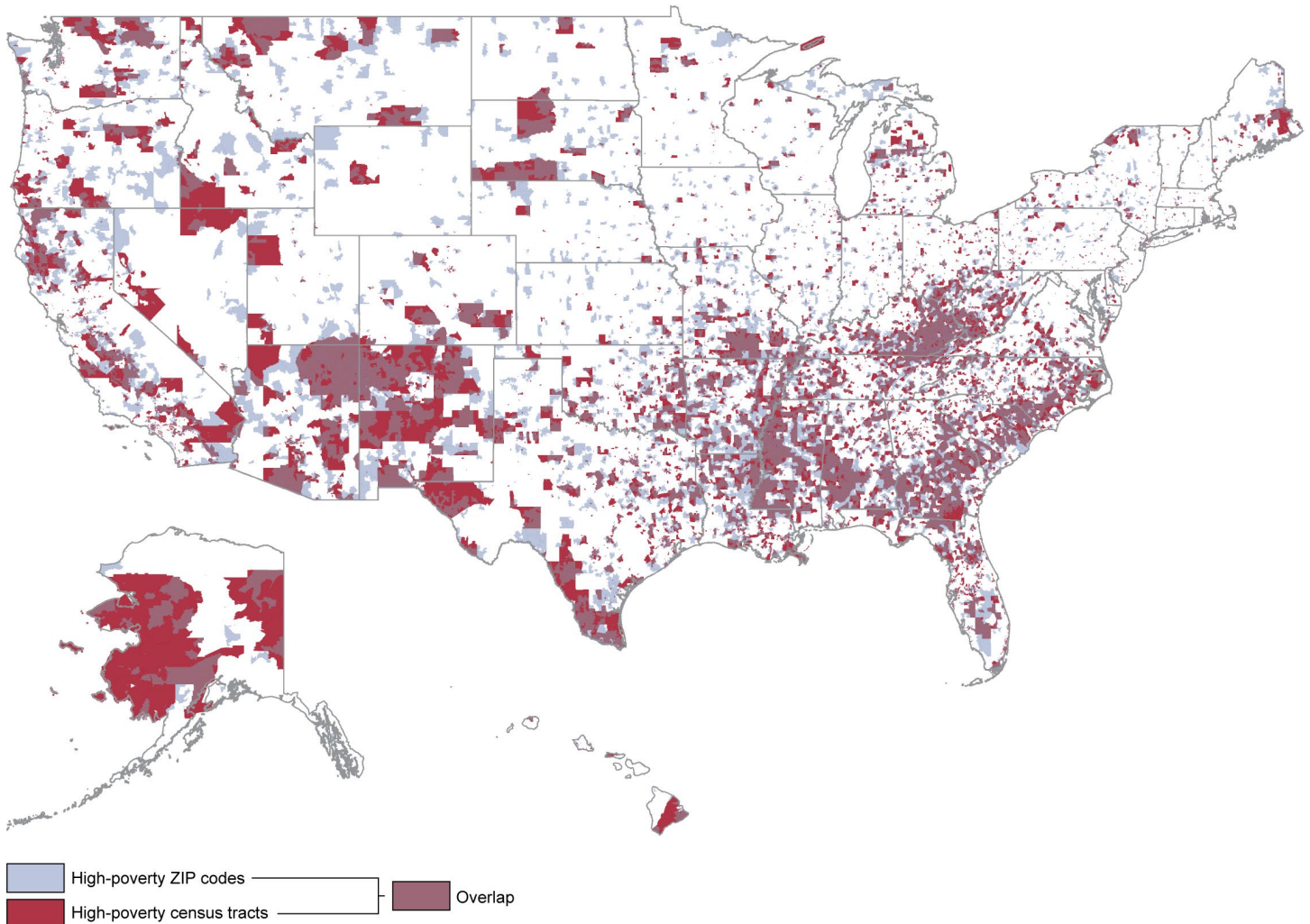
³²We excluded 1,880 ZIP codes from our analysis because they did not have poverty rate estimates in the 2017 ACS 5-year estimates due to low population. Of the remaining 31,109 ZIP codes, 7,627 had high poverty. We created a confidence interval for the number of ZIP codes that qualify as having high poverty. At the 90 percent confidence level, from 7,555 to 7,699 ZIP codes could have met the standards for high poverty. For our analysis, we counted a high-poverty ZIP code as overlapping with a high-poverty census tract if any area in the ZIP code was part of a high-poverty census tract. See app. I for more information on how we identified high-poverty areas.

poverty census tract (see fig. 5).³³ Additionally, roughly 62 percent of residents in high-poverty ZIP codes belonged to a racial or ethnic minority group, which was similar to high-poverty census tracts (63 percent).³⁴

³³We excluded 1,880 ZIP codes from our analysis because they did not have poverty rate estimates in the 2017 ACS 5-year estimates due to low population. Of the remaining 31,109 ZIP codes, 7,627 had high poverty. We created a confidence interval for the number of ZIP codes that qualify as having high poverty. At the 90 percent confidence level, from 7,555 to 7,699 census tracts could have met the standards for high poverty. For our analysis, we counted a high-poverty ZIP code as overlapping with a high-poverty census tract if any area in the ZIP code was part of a high-poverty census tract. See app. I for more information on how we identified high-poverty areas.

³⁴At the 90 percent confidence level, this estimate has a margin of error of plus or minus .05 percent.

Figure 5: High-Poverty ZIP Codes and Census Tracts, as of 2017



Source: GAO analysis of American Community Survey data. | GAO-20-518

However, high-poverty ZIP codes are not an exact substitute for high-poverty census tracts. Compared to high-poverty census tracts, as of 2017 more high-poverty ZIP codes were in the South (50 percent versus 43 percent) and fewer were in the Northeast (10 percent versus 15 percent), but the proportions in the Midwest and West were nearly equivalent (see table 2). In addition, the majority of high-poverty ZIP codes were rural, which was similar to persistent-poverty counties but different from high-poverty census tracts. As a result, high-poverty ZIP

codes overlapped with persistent-poverty counties more frequently than did high-poverty census tracts (29 percent versus 15 percent).³⁵

Table 2: Characteristics of Areas with Persistent or High Poverty, as of 2017

Percent	Persistent-poverty counties	High-poverty census tracts	High-poverty ZIP codes
Of Total	13 ^a	28 ^a	25 ^a
In Northeast	0	15	10
In Midwest	10	22	21
In South	81	43	50
In West	9	20	19
Urban	16	74	30
Suburban	35	6	18
Rural	50	20	53
Of population in racial or ethnic minority group	62 ^b	63 ^b	62 ^b
Overlapping with persistent-poverty counties	Not applicable	15	29

Source: GAO analysis of Census, American Community Survey, and Small Area Income and Poverty Estimates data. | GAO-20-518

^aEstimates have a margin of error of ± 2 percentage points, at the 90 percent confidence level.

^bEstimates have a margin of error of ± 0.05 percentage points or less, at the 90 percent confidence level.

³⁵ZIP codes can include areas in multiple counties. For our analysis, we counted a high-poverty ZIP code as overlapping with a persistent-poverty county if any area in the ZIP code was part of a persistent-poverty county.

Programs Generally Used Less Than 10 Percent of Funding in Persistent-Poverty Counties, but Funding Data Have Limitations

Agencies Generally Used Less Than 10 Percent of Program Funding in Persistent-Poverty Counties

Using USAspending.gov data, we determined that 114 of the 247 programs we identified (46 percent) had sufficiently complete data on the primary place of performance at the county level.³⁶ These programs were implemented by seven different agencies and accounted for \$87 billion in total funds used in fiscal years 2017–2019 (76 percent of the funds used under all programs we identified).

In aggregate, agencies used about 8 percent of funding under these programs in persistent-poverty counties in fiscal years 2017–2019 (see fig. 6).³⁷ Agencies used less than 10 percent of funding in persistent-poverty counties in 68 programs (60 percent of the total), including 27 programs that did not have any funds used in these areas.³⁸ However, for some programs, agencies used relatively large percentages of funds in persistent-poverty counties, with three programs using more than 50 percent of funding in these counties.

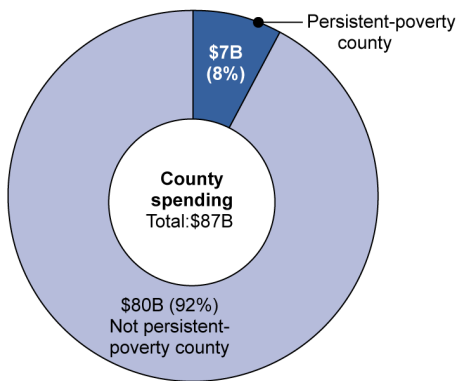
³⁶We considered data to be sufficiently complete for the purposes of this analysis if 90 percent or more of observations in a field were present. These programs do not represent a generalizable sample of all programs that could be subject to H.R. 2055.

³⁷The median program used 7.7 percent of funds in persistent-poverty counties in fiscal years 2017–2019. Because these programs are not a representative sample of all programs that could be subject to H.R. 2055, these results are not generalizable to all programs.

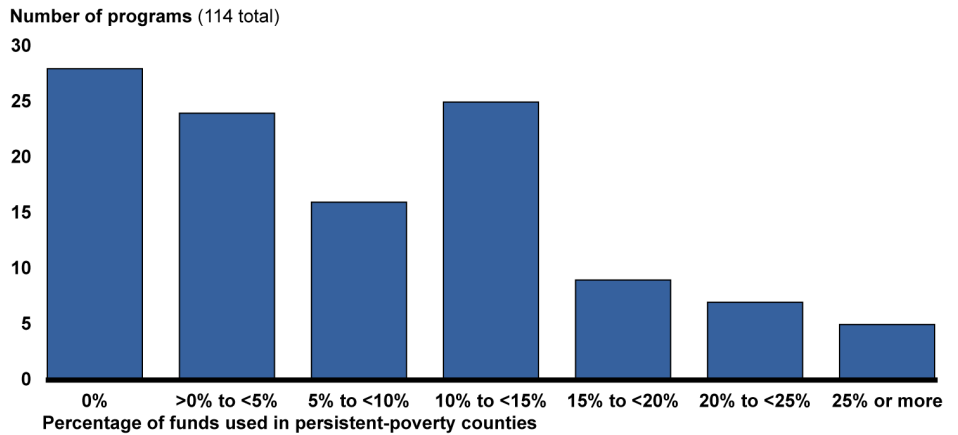
³⁸See app. III for a description of the amount of funding, based on USAspending.gov data, used in persistent-poverty counties by each program with sufficiently complete data.

Figure 6: Funds Used in Persistent-Poverty Counties among Selected Federal Programs, Fiscal Years 2017–2019

Overall funding levels



Program funding levels



Source: GAO analysis of USAspending.gov data. | GAO-20-518

Note: This figure includes federal programs that could be subject to proposed legislation—"An Act Targeting Resources to Communities in Need," H.R. 2055, 116th Cong. (2019).

Variation across Agencies

The proportion of program funding agencies used in persistent-poverty counties varied by agency. As shown in table 3, programs in three of seven agencies used less than 10 percent of their funds in persistent-poverty counties, while another three used 11–13 percent. The Regional Commissions used the highest percentage (53 percent) of funding in persistent-poverty counties, although this was through a single program and the amount used in those counties was relatively small (\$30 million).

Table 3: Percentage of Funds Used in Persistent-Poverty Counties among Selected H.R. 2055 Programs, by Agency, Fiscal Years 2017–2019, Based on Publicly Reported Data

Agency	Total number of H.R. 2055 programs with sufficient county data ^a	Number of those programs that used at least 10 percent of their funds in persistent-poverty counties ^a	Aggregate percentage of funds used in persistent-poverty counties ^a
Department of Agriculture	43	25	8
Department of Commerce	6	5	12
Department of Education	1	1	11
Regional Commissions	1	1	53
Department of Health and Human Services	16	7	13
Department of Justice	39	5	4

Agency	Total number of H.R. 2055 programs with sufficient county data^a	Number of those programs that used at least 10 percent of their funds in persistent-poverty counties^a	Aggregate percentage of funds used in persistent-poverty counties^a
Department of Labor	8	2	4
Overall	114	46	8

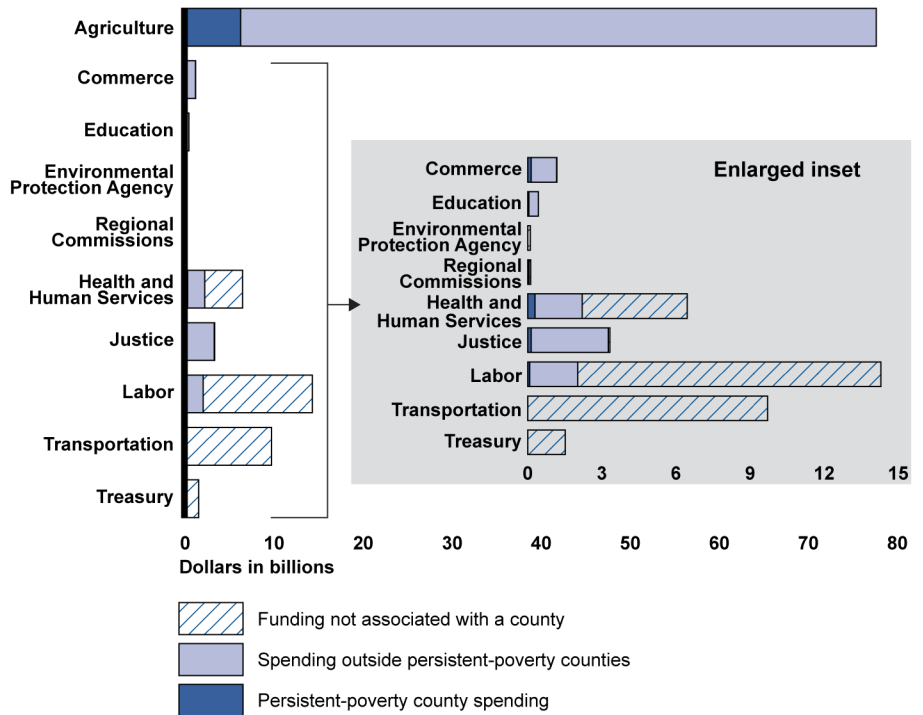
Source: GAO analysis of USAspending.gov data. | GAO-20-518

Notes: This table includes federal programs that may be subject to the proposed legislation—"An Act Targeting Resources to Communities in Need," H.R. 2055, 116th Cong. (2019). In this analysis, we grouped all Regional Commissions as one "agency" due to their relative size.

^aIncludes federal programs that had sufficiently complete data for primary place of performance at the county level (to allow for a determination of the percentage of funds used in persistent-poverty counties). These programs represented 46 percent of H.R. 2055 programs.

Of the funds used in persistent-poverty counties that we analyzed, USDA programs used 90 percent (see fig. 7). USDA had the most programs with sufficiently complete county-level data, and each of these programs used an average of \$602 million per year in fiscal years 2017–2019. In contrast, the other programs with sufficiently complete county-level data used an average of \$38 million. As a result, our analysis of the amount and percent of funding used in persistent-poverty counties by H.R. 2055 programs largely reflects funds used by USDA programs.

Figure 7: Total Funding Used Overall and in Persistent-Poverty Counties among Selected Federal Programs, by Department or Agency, for Fiscal Years 2017–2019



Source: GAO analysis of USAspending.gov data. | GAO-20-518

Notes: This figure includes federal programs that could be subject to proposed legislation—“An Act Targeting Resources to Communities in Need,” H.R. 2055, 116th Cong. (2019). In this analysis, we grouped all Regional Commissions as one “agency” due to their relative size.

Variation within Agencies

Of the five agencies with multiple programs with sufficiently complete data, four had large variations in the percentage of funding used in persistent-poverty counties across programs, based on USAspending.gov data.³⁹ For example, among programs in the Department of Labor’s Employment and Training Administration, two programs used no funds in persistent-poverty counties and another used roughly 23 percent of its funding in these counties. Similarly, within USDA, some programs under the Rural Business-Cooperative Service used no funding in these counties, while others used as much as 74 percent.

³⁹For the purpose of this analysis, we defined large variation as resulting in a standard deviation greater than the mean value. See app. I for a full description of our methodology.

Variation by Funding Type
(Grants, Direct Payments, and
Loans)

Overall, programs in our analysis used roughly 12 percent of grant and direct payment funds in persistent-poverty counties, compared with roughly 7 percent of loan funds. However, only 20 loan programs (all administered by USDA) had sufficiently complete data for our analysis, and one large program—Very Low to Moderate Income Housing Loans—had a significant impact on our results.

Agencies Used Higher
Levels of Program Funds
in High-Poverty ZIP
Codes, Especially through
Subawards

Prime Award Funds Used in
High-Poverty Zip Codes

Based on USAspending.gov data, of the 247 programs, only 46 (19 percent) had sufficient data on primary place of performance at the ZIP code level for prime awards to determine the extent to which funds were used in high-poverty ZIP codes.⁴⁰ That so few programs had sufficiently complete data indicates that, in most cases, prime awards were used in multiple ZIP codes or in areas that crossed ZIP code boundaries. These 46 programs were implemented by five agencies and accounted for about \$5 billion in total funding used during these years (4.3 percent of all funds used by H.R. 2055 programs).

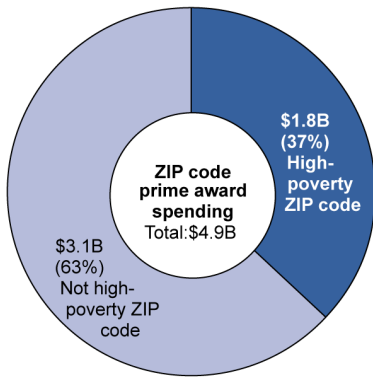
Among these 46 programs, about 37 percent of their prime award funds were used in high-poverty ZIP codes in fiscal years 2017–2019, compared to 7 percent of funds used in persistent-poverty counties (see fig. 8).⁴¹ Nine had more than half of their prime award funding used in high-poverty ZIP codes and 32 had more than 25 percent used in these areas.

⁴⁰As previously noted, these programs are not a representative sample of all programs that could be subject to H.R. 2055, and our results are not generalizable to all programs.

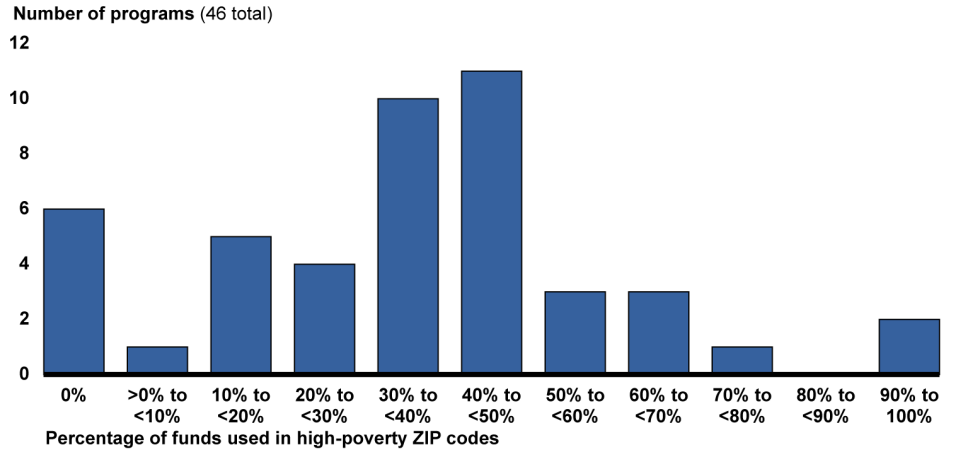
⁴¹The proportion of funds used in persistent-poverty counties is calculated here only for programs with sufficiently complete prime award data at the county and ZIP code-level. As noted above, for all programs with sufficiently complete data at the county-level, the proportion was 8 percent.

Figure 8: Prime Award Funds Used in High-Poverty ZIP Codes among Selected Federal Programs, Fiscal Years 2017–2019

Overall funding levels



Program funding levels



Source: GAO analysis of USAspending.gov data. | GAO-20-518

Note: This figure includes federal programs that could be subject to proposed legislation—"An Act Targeting Resources to Communities in Need," H.R. 2055, 116th Cong. (2019).

Four of the five agencies that had programs with sufficiently complete ZIP code data used more than 33 percent of their prime award funding in high-poverty ZIP codes (see table 4). The Regional Commission program had the highest percentage of funds used in these areas—63 percent.

Table 4: Percentage of Prime Award Funding Used in High-Poverty ZIP Codes among Selected Federal Programs, by Agency, for Fiscal Years 2017–2019

Agency	Number of H.R. 2055 programs with sufficient prime award ZIP code data^a	Percentage of prime award funds used in high-poverty ZIP codes^a
Department of Agriculture	1	0
Department of Commerce	6	42
Department of Education	1	40
Regional Commissions	1	63
Department of Justice	37	34
Overall	46	37

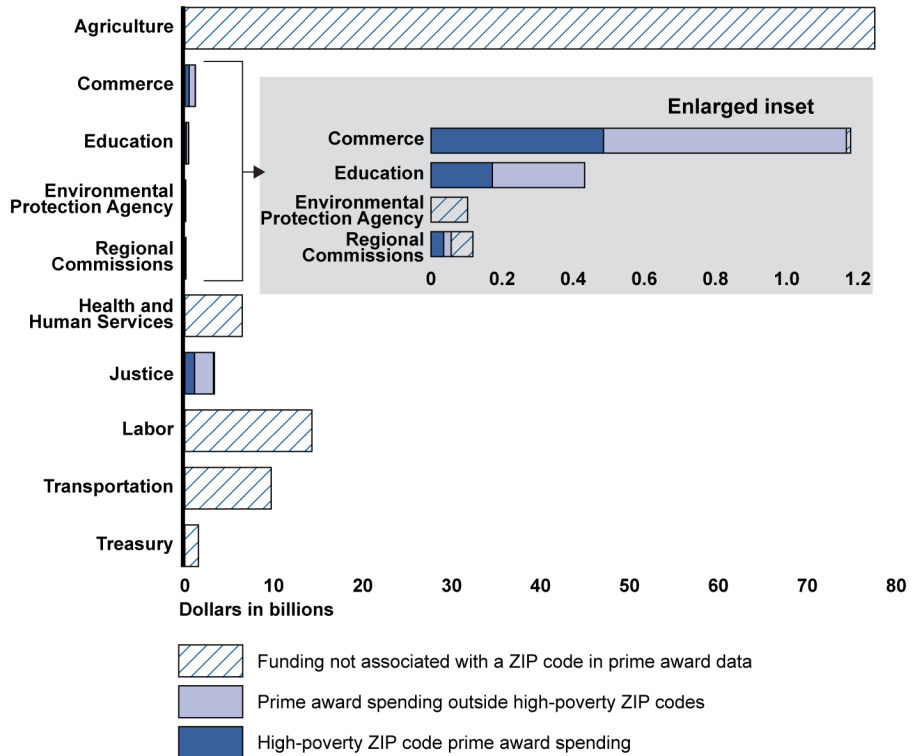
Source: GAO analysis of USAspending.gov data. | GAO-20-518

Notes: This table includes federal programs that may be subject to the proposed legislation—"An Act Targeting Resources to Communities in Need," H.R. 2055, 116th Cong. (2019). In this analysis, we grouped all Regional Commissions as one "agency" due to their relative size.

^aIncludes federal programs that had sufficiently complete data for primary place of performance at the ZIP code level (to allow for a determination of the percentage of funds used in high-poverty ZIP codes). These programs represented 19 percent of H.R 2055 programs.

The Department of Justice used the highest dollar amount of prime award funding in high-poverty ZIP codes—about \$1.1 billion (see fig. 9). However, six programs in our analysis had no prime award funding in high-poverty ZIP codes, including the only USDA program for which we had ZIP code data. (See appendix III for a table on use of funds by all programs in our analysis).

Figure 9: Total Prime Award Funding Used Overall and in High-Poverty ZIP Codes among Selected Federal Programs, by Department or Agency, for Fiscal Years 2017–2019



Source: GAO analysis of USAspending.gov data. | GAO-20-518

Notes: This figure includes federal programs that could be subject to the proposed legislation—"An Act Targeting Resources to Communities in Need," H.R. 2055, 116th Cong. (2019). In this analysis, we grouped all Regional Commissions as one "agency" due to their relative size.

Subaward Funds Used in High-Poverty Zip Codes

More programs—101 programs (41 percent)—had sufficiently complete ZIP code-level primary place of performance data for subawards than for prime awards.⁴² Based on USAspending.gov data, these programs accounted for about \$35 billion in grant funding used in fiscal years 2017–2019, of which \$12 billion (35 percent) was subawarded.⁴³ That most of these programs did not have sufficiently complete ZIP code-level data for their prime awards indicates that the scope for these prime awards was

⁴²All programs but one for which subaward data were available had sufficiently complete data for primary place of performance at the ZIP code-level.

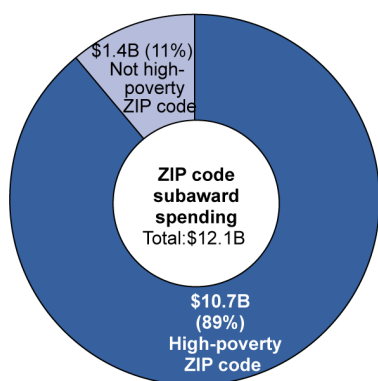
⁴³We only included subawards that had corresponding prime award data in our analysis.

larger than a single ZIP code but that agencies were able to track subawards to individual ZIP codes.⁴⁴ For example, this could be the case if a grant was made to a state or local government, which then made subgrants to local service providers.

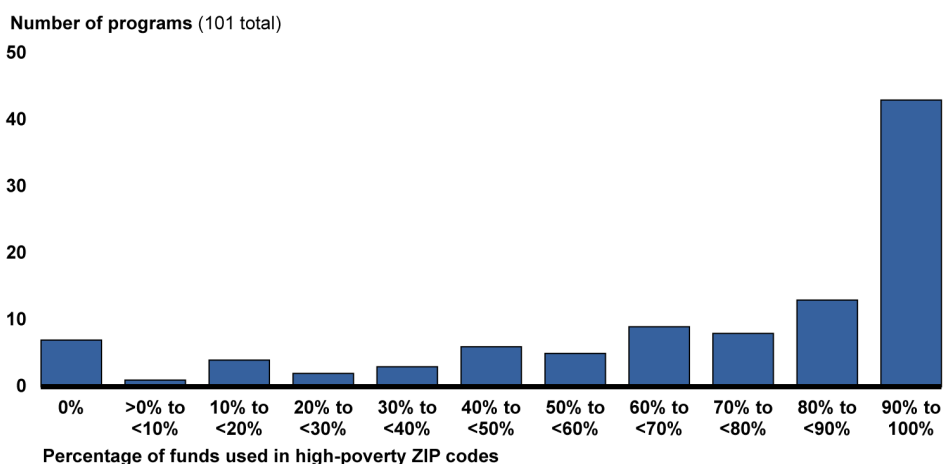
According to USAspending.gov data, programs with sufficiently complete data had 89 percent of subawarded funds used in high-poverty ZIP codes in fiscal years 2017–2019 (see fig. 10).

Figure 10: Subaward Funds Used in High-Poverty ZIP Codes among Selected Federal Programs, Fiscal Years 2017–2019

Overall funding levels



Program funding levels



Source: GAO analysis of USAspending.gov data. | GAO-20-518

Note: This figure includes federal programs that could be subject to proposed legislation—"An Act Targeting Resources to Communities in Need," H.R. 2055, 116th Cong. (2019).

The proportion of subawarded funds used in high-poverty ZIP codes was generally high across the eight agencies that implemented these programs, and some used nearly all of their subaward funding in high-poverty ZIP codes (see table 5).

⁴⁴Thirty-nine programs had sufficiently complete ZIP code-level data for prime awards and subawards. These programs' subawards accounted for \$550 million in subgrant funding, which represented about 11 percent of the prime awards made under those programs in fiscal years 2017–2019. To provide the most complete picture of where program funds were used, we included these programs' awards in both our prime award and subaward analyses. Therefore, a limited proportion of funding may be counted as both prime award and subaward spending. See app. I for more information on our methodology.

Table 5: Percentage of Subaward Funding Used in High-Poverty ZIP Codes among Selected Federal Programs, for Fiscal Years 2017–2019

Agency	Number of H.R. 2055 programs with sufficient subaward ZIP code data^a	Percentage of subaward funds used in high-poverty ZIP codes^a
Department of Agriculture	6	91
Department of Commerce	7	50
Department of Education	1	76
Environmental Protection Agency	2	94
Department of Health and Human Services	32	78
Department of Justice	35	45
Department of Labor	15	94
Department of Transportation	3	98
Overall	101	89

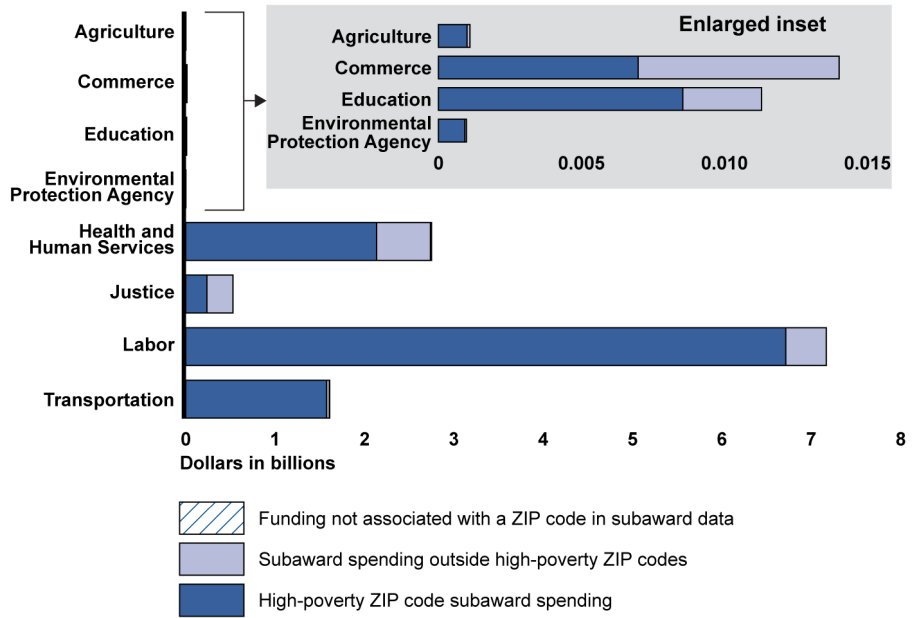
Source: GAO analysis of USAspending.gov data. | GAO-20-518

Note: This table includes federal programs that could be subject to the proposed legislation—"An Act Targeting Resources to Communities in Need," H.R. 2055, 116th Cong. (2019).

^aIncludes federal programs that had sufficiently complete data for primary place of performance at the ZIP code-level (to allow for a determination of the percentage of funds used in high-poverty ZIP codes). These programs represented 41 percent of H.R. 2055 programs.

In terms of dollar amounts, the Departments of Labor, Health and Human Services, and Transportation used the most subaward funds in high-poverty ZIP codes (see fig. 11).

Figure 11: Total Subaward Funding Used Overall and in High-Poverty ZIP Codes among Selected Federal Programs, by Department or Agency, for Fiscal Years 2017–2019



Source: GAO analysis of USAspending.gov data. | GAO-20-518

Note: This figure includes federal programs that could be subject to the proposed legislation—"An Act Targeting Resources to Communities in Need," H.R. 2055, 116th Cong. (2019).

Publicly Reported Federal Funding Data Have Some Limitations

While USAspending.gov is the official source of publicly reported information on where federal program funds have been used, there are some limitations to the primary place of performance information in these data.

- First, as we previously reported, agencies may use different methods to determine the primary place of performance for their awards, which may lead to inconsistencies in how they collect and report the information.⁴⁵ For example, we reported that according to agency officials, agencies have relied on the legal business address as the primary place of performance, requested specific primary place of performance data from the grant or other recipient, or used a combination of approaches. A Treasury whitepaper also noted that agencies may differ in how and when they obtain primary place of

⁴⁵GAO-18-138.

performance information for financial assistance awards—by completing a SF424 Project Performance Site Location Form, as part of the application narrative, verbally at the time of award, or not at all.⁴⁶

We previously reported that officials from several agencies said it would be helpful for OMB to issue guidance on primary place of performance to help agencies report this information consistently, and we recommended in November 2017 that OMB provide additional guidance on how agencies should identify and report primary place of performance for awards.⁴⁷ While OMB issued some guidance in 2018 clarifying reporting guidelines for some data elements, we recently reiterated the need for OMB to release additional guidance that specifically addresses the primary place of performance for noncontract awards.⁴⁸ However, as of April 2020, OMB had not fully implemented this recommendation.⁴⁹

- Second, USAspending.gov data allow agencies to report only one primary place of performance for each award and do not indicate the proportion of an award’s funding that was used in the reported location. The primary place of performance data indicate where funds were predominantly used, but according to Treasury officials, in some cases, programs also may have used a substantial amount of award funds in other locations. In an extreme example, an agency could report a persistent-poverty county as the primary place of performance for an award, associating the entire award amount with that location, although 49 percent of the award was not used in a persistent-poverty county.

⁴⁶See Treasury Department “Element: Primary Place of Performance Address, Primary Place of Performance Congressional District, Primary Place of Performance Country Code, and Primary Place of Performance Country Name: Response to Public Feedback” (Washington D.C.: August 2015). The white paper also notes that for financial assistance awards, the primary place of performance is not always the prime organization’s location or known at the time of application. Federal agencies rely on the applicant organization to provide information identifying where the work will be performed. The applicant can supply both the primary site where the work will be performed and, if a portion of the project will be performed at any other site, identify those site locations as well.

⁴⁷[GAO-18-138](#).

⁴⁸[GAO-20-75](#).

⁴⁹See GAO, *Priority Open Recommendations: Office of Management and Budget*, [GAO-20-542PR](#) (Washington, D.C.: April 27, 2020).

However, this issue may be mitigated because agencies can designate the appropriate geographic level for the place of performance.⁵⁰ For example, if an award's funds were used relatively evenly across several ZIP codes within a county, an agency official could designate the county as the appropriate level, leaving the ZIP code blank, rather than selecting a single ZIP code. Similarly, if an award's funds were used in multiple counties, an agency could specify the entire state as the place of performance, leaving the county field blank. This could have led to fewer programs having sufficiently complete data at a given geographic level, but may have improved the accuracy of data that were available.

- Finally, USAspending.gov may not include information on all subawards. Prime award recipients are generally required to disclose information about any subawards they make of \$25,000 or more, and GSA has issued instructions on how to do so.⁵¹ However, GSA officials said that GSA is not responsible for auditing agency administrative data to ensure that every eligible subaward is reported or that the reported data are accurate. Additionally, some loan programs allow prime recipients to relend funds to subrecipients, but the FFATA Subaward Reporting System does not include subaward data for loans, and thus they are not included in USAspending.gov.⁵²

Agency Comments

We provided a draft of this report to the Department of the Treasury and the General Services Administration for review and comment. The General Services Administration provided us with technical comments, which we incorporated as appropriate.

⁵⁰According to Treasury officials, the "primary place of performance scope" data field was added to USAspending.gov in January 2020 to reflect agencies' designations.

⁵¹28 C.F.R. § 170.220(a). Prime award recipients report information on subawards using the FFATA Subaward Reporting System, which GSA maintains and which provides subaward data to USAspending.gov on a daily basis.

⁵²For example, USDA's Intermediary Relending Program provides low-interest loans to local lenders (intermediaries) that relend to businesses to improve economic conditions and create jobs in rural communities.

We are sending copies of this report to the relevant congressional committees, the Secretary of the Treasury, and the Administrator of the General Services Administration. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff members have any questions about this report, please contact William B. Shear at (202) 512-8678 or shearw@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of our report. Key contributors to this report are listed in appendix IV.

A handwritten signature in black ink that reads "William B. Shear". The signature is written in a cursive, flowing style.

William B. Shear
Director, Financial Markets
and Community Investment

List of Addressees

The Honorable Jerry Moran
Chairman

The Honorable Jeanne Shaheen

Ranking Member

Subcommittee on Commerce, Justice, Science, and Related Agencies

Committee on Appropriations

United States Senate

The Honorable José Serrano

Chairman

The Honorable Robert Aderholt

Ranking Member

Subcommittee on Commerce, Justice, Science, and Related Agencies

Committee on Appropriations

House of Representatives

The Honorable James Clyburn

Majority Whip

House of Representatives

Appendix I: Objectives, Scope, and Methodology

Our objectives for this review were to provide information on (1) the location and characteristics of counties and areas with persistent or high poverty, and (2) the percentage of program funds used in persistent-poverty counties and high-poverty areas for H.R. 2055 programs in fiscal years 2017–2019.¹

To identify counties with persistent poverty and areas with high poverty, we analyzed Census Bureau, American Community Survey (ACS), and Small Area Income and Poverty Estimates (SAIPE) data. For persistent-poverty counties, we used the 1990 and 2000 decennial censuses and the 2017 SAIPE to identify counties with actual or estimated household poverty rates of 20 percent or higher in all three data sets. For high-poverty areas, we used the 2013–2017 ACS 5-year estimates to identify census tracts and ZIP codes with household poverty rates of at least 20 percent over those years. Because the ACS and SAIPE household poverty measures are estimates, we constructed confidence intervals for the number of persistent-poverty counties and high-poverty areas we identified, at the 90 percent level. We created these confidence intervals through a technique called a bootstrap simulation, based on the confidence intervals for estimated poverty rates of each county, census tract, and ZIP code.²

To describe the demographic characteristics of persistent-poverty counties and high-poverty census tracts and ZIP codes, we analyzed 2017 ACS and SAIPE data on population, race, and ethnicity. For each county, census tract, and ZIP code, we created a measure of the proportion of the population that belonged to a racial or ethnic minority group by combining all race and ethnicity groups besides White/Non-

¹H.R. 2055, introduced in 2019, would require agencies to use at least 10 percent of funds under specified federal “development programs” in persistent-poverty counties and to meet minimum funding levels for high-poverty census tracts. An Act Targeting Resources to Communities in Need, H.R.2055, 116th Cong. (2019).

²The ACS and SAIPE poverty rate estimates for each county, census tract, and ZIP code are based on a sample or model of the population and may not represent the actual population’s poverty rate. In some cases, this could mean that a county or area would be identified as having persistent or high poverty when it did not, or vice versa. Because each sample follows a probability procedure based on random selection, they represent only one of a large number of samples that could have been drawn. Because each sample could have provided different poverty rate estimates, and therefore different numbers of persistent-poverty counties and high-poverty areas, we express our confidence in the precision of our particular sample’s results as a 90 percent confidence interval. This is the interval that would contain the actual number of persistent-poverty counties or high-poverty areas for 90 percent of the samples we could have drawn.

Hispanic included in the ACS. We then estimated the proportion of the population of persistent-poverty counties and high-poverty census tracts and ZIP codes that were nonwhite. We compared these estimates to the proportions of the populations of other counties, tracts, and ZIP codes that were nonwhite and found that the differences were statistically significant at the 90 percent level.³

To describe the urban and rural characteristics of persistent-poverty counties and high-poverty census tracts and ZIP codes, we developed a measure based on different Department of Agriculture (USDA) classification schemes for urban development. The terms “urban” and “rural” are generally used to represent the extremes on a continuum of population, population density, and built infrastructure. To measure this continuum, USDA developed different classification schemes for different geographies, which have been updated over time and which do not have exactly the same purpose or classification codes. For counties, we used the 2013 Rural-Urban Continuum Codes, which distinguish metropolitan counties by the population size of their metropolitan area, and nonmetropolitan counties by degree of urbanization and adjacency to a metropolitan area. For census tracts and ZIP codes, we used Rural-Urban Commuting Area codes, which classify U.S. census tracts using measures of population density, urbanization, and daily commuting.

We reviewed the codes in these two classification schemes to identify the closest matches in describing urban and rural areas. As shown in table 6, our measure condensed the codes into three categories: Urban, Suburban, and Rural. For counties, we considered all counties with at least one city with a population of at least 50,000 to be urban. This ensured that we would identify all persistent-poverty counties that overlap with cities of at least 50,000 residents, but because counties can be larger than a metropolitan area, some of these counties may contain areas that are outside of a metropolitan area and are considered suburban or rural. We considered counties described as “completely rural” to be rural, in addition to counties with populations less than 20,000 that are not adjacent to a metropolitan area. For census tracts and ZIP codes, we considered only those within the urban core to be urban, as

³We created 90 percent confidence intervals for our estimates of the proportion of the population in persistent-poverty counties, high-poverty census tracts, and high-poverty ZIP codes based on underlying estimates of race and ethnicity proportions. We created similar confidence intervals for our estimates in counties and areas that did not have persistent or high poverty. We compared these confidence intervals and found that they did not overlap.

these areas overlap directly with a metropolitan area. We considered census tracts and ZIP code classified as “large rural” or “small town/rural” to be rural.

Table 6: GAO Classification of Urban and Rural Areas

GAO classification	2013 Rural-Urban Continuum codes		2010 Condensed Rural-Urban Commuting Area codes	
	Code	Description	Code	Description
Urban	1	Counties in metropolitan areas of 1 million population or more	1	Urban core
	2	Counties in metropolitan areas of 250,000–1 million population		
	3	Counties in metropolitan areas of fewer than 250,000 population		
Suburban	4	Urban population of 20,000 or more, adjacent to a metropolitan area	2	Suburban
	5			
	6	Urban population of 20,000 or more, not adjacent to a metropolitan area		
Rural		Urban population of 2,500–19,999, adjacent to a metropolitan area	3	Large rural
	7	Urban population of 2,500–19,999, not adjacent to a metropolitan area	4	Small town/rural
	8	Completely rural or less than 2,500 urban population, adjacent to a metropolitan area		
	9	Completely rural or less than 2,500 urban population, not adjacent to a metropolitan area		

Source: GAO. | GAO-20-518

To determine the percentage of program funds used in persistent-poverty counties and high-poverty areas, we first identified programs that may fall within the scope of H.R. 2055. The bill defines a “development program” as programs, offices, or appropriations accounts in 34 specified categories.⁴ For purposes of this review, we identified development programs using the bill’s references to:

1. a specific program name (11 references);

⁴H.R. 2055, § 2(1).

2. a department or agency that implements a program or programs (11 references); or
3. a law that authorizes a program or programs (12 references).⁵

Many of the programs described in H.R. 2055 are “domestic assistance” programs. In general, domestic assistance programs provide grants, loans, direct payments, or nonfinancial assistance to state and local governments; federally recognized Indian tribal governments; domestic public, quasi-public, and private profit and nonprofit organizations and institutions; specialized groups; and individuals. Domestic assistance programs are assigned a Catalog of Federal Domestic Assistance (CFDA) number, and federal spending data track programs using these numbers.⁶ Accordingly, we limited our analysis to programs that have been assigned CFDA numbers.⁷

⁵For purposes of our review, references to appropriation accounts were treated as references to a specific program by name, or the department or agency that implements a program or programs.

⁶The CFDA was a government-wide compendium of federal programs, projects, services, and activities that provide assistance or benefits to the American public. CFDA was created by the Federal Program Information Act of 1977, which required the Director of the Office of Management and Budget to identify each domestic assistance program by title, authorizing statute, administering office, and by an identifying number assigned by the Director. Responsibility for implementing the CFDA was transferred to the General Services Administration in 1983. For each federal award (grant, loan, direct payment, or other form of assistance), the Federal Funding Accountability and Transparency Act of 2006 requires federal agencies to report the CFDA number of the federal financial assistance program under which the award is made, where applicable. FFATA, § 2(b)(1)(C). The standalone compendium was terminated in 2018, but CFDA numbers were thereafter incorporated in the System for Award Management, Assistance Listings website. See Public Law 98-169.

⁷Some agencies may not have assigned a CFDA number to all activities that could nonetheless meet the bill’s definition of a development program. The term “program” does not have a well-defined, standard meaning in the legislative process. Programs are “generally, an organized set of activities directed toward a common purpose or goal that an agency undertakes or proposes to carry out its responsibilities.” See GAO, *A Glossary of Terms Used in the Federal Budget Process*, [GAO-05-734SP](#) (Washington, D.C.: Sept. 1, 2005). For examples of program activities that were not assigned a CFDA number, see GAO, *Employment and Training Programs: Department of Labor Should Assess Efforts to Coordinate Services Across Programs*, [GAO-19-200](#) (Washington, D.C.: Mar. 28, 2019).

In most cases, we were able to identify a CFDA-numbered program or programs for each of the 34 categories in H.R. 2055.⁸ To identify programs referred to by name or implementing agency, we reviewed program and agency-specific documents and the System for Award Management. We were able to identify 11 CFDA-numbered programs that exactly or closely matched the description of the programs referred to in H.R. 2055 by name. When we identified a program that closely, but not exactly, matched the description of a program referred to by name in H.R. 2055, we assumed that it could be subject to H.R. 2055 and included it in our analysis. We also identified CFDA-numbered programs—171 programs total—based on H.R. 2055’s references to implementing agencies.

We identified 65 programs based on references in H.R. 2055 to authorizing laws. To do this, we relied on the descriptions of authorizing laws in the System for Award Management, Grants.gov, and publically available program documentation. Due to the lack of standardized language in authorizing laws and public sources we relied on, the programs we identified represent examples of programs authorized (in whole or in part) under the cited laws, rather than all such programs. In some cases, we assumed that programs similar to the ones we identified—or which are implemented by the same office—could be subject to H.R. 2055, and we included those in our analysis as well.

In all, we identified 247 programs which may be subject to H.R. 2055. However, this list should be viewed as illustrative rather than definitive. Due to the scope of this review, we were not able to determine the exact group of programs that would ultimately be subject to H.R. 2055. For example, the scope of the development programs subject to H.R. 2055 may depend on interpretation by the implementing agencies, whose views we did not obtain. In addition, the methodology described above included assumptions and limitations that affected the number of programs we identified.

To identify where these programs used funds in fiscal years 2017–2019, we used USAspending.gov data on funding awards. Because of the large number of programs to which H.R. 2055 refers, we relied on publicly reported federal spending data to conduct our analysis and did not

⁸We were not able to identify a CFDA-numbered program associated with a category described as “Department of Commerce, National Institute of Standards and Technology, Construction”, nor for three categories each of which described an inactive Federal Regional Commission.

consult with the federal agencies that implement these programs to obtain their perspectives or review any additional data sources they may maintain. We plan to conduct future work to examine how some agencies have implemented requirements to use at least 10 percent of program funds in persistent-poverty counties.

We accessed these data through USAspending.gov's Advanced Award Search feature in February and March of 2020. Each funding award is associated with a program or programs, and we searched for award data by agency or CFDA number, depending on how a program we identified was referred to in H.R. 2055. We searched for awards made in fiscal years 2017–2019. We further limited our analysis to awards that had a performance period in fiscal years 2017–2019, as awards can be made in one period and performed in another. We also excluded data on contract awards, as our intention was to assess where program funds were used to provide assistance, rather than procurement of goods and services for the agency. We also accessed data on subawards through USAspending.gov, which receives those data through a separate system—the FFATA Subaward Reporting System (FSRS)—that the General Services Administration administers. We only included subawards that also had a prime award included in our dataset.

To determine which of these programs had sufficiently complete primary place of performance data for fiscal years 2017–2019, we assessed the proportion of those data that were missing at the county and ZIP code level for both prime awards and subawards. For the purposes of our analysis, we considered data to be sufficiently complete if less than 10 percent of observations in a field were missing across all of a program's awards. Of the 247 total programs we identified, 161 (65 percent) had sufficiently complete data at the county or ZIP code level, or both, for either prime awards or subawards. For 52 of the 247 programs we identified (21 percent), USAspending.gov did not have any award data for fiscal years 2017–2019. The proportion of programs with sufficiently complete primary place of performance data varied widely by agency (see table 7).

Table 7: H.R. 2055 Programs with Sufficiently Complete Primary Place of Performance Data, by Agency, Fiscal Years 2017–2019

Agency	Number of H.R. 2055 programs identified	Percent of programs with sufficiently complete primary place of performance data		
		County	ZIP code for prime awards	ZIP code for subawards
Department of Agriculture	48	90	2	13
Department of Commerce	8	75	75	88
Department of Education	1	100	100	100
Department of Environmental Protection Agency	2	0	0	100
Department of Health and Human Services	81	20	0	40
Department of Housing and Urban Development	2	0	0	0
Department of Justice	59	66	63	59
Department of Labor	25	32	0	60
Department of Transportation	4	0	0	75
Department of the Treasury	5	0	0	0
Regional Commissions	12	8	8	0
Overall	247	46	19	41

Source: GAO analysis of USAspending.gov data. | GAO-20-518

Note: For the purposes of our analysis, we considered data to be sufficiently complete if less than 10 percent of observations in a field were missing across all of a program’s awards.

To determine the percentage of prime award funds that programs with sufficiently complete data used in persistent-poverty counties and high-poverty ZIP codes in fiscal years 2017–2019, we used data from USAspending.gov on total obligations for awards made as grants and direct payments, and on total face value for loan awards.⁹ We calculated a program’s total funding by summing the total obligations and the total loan face values for each award. We then used the primary county of performance and primary ZIP code of performance associated with each

⁹We did not assess agencies’ compliance with statutory 10-20-30 requirements because it was outside the scope of this review. Moreover, the analysis we performed may not accurately reflect an agency’s compliance for multiple reasons. For example, the previous 10-20-30 requirements defined persistent-poverty counties using earlier data than those specified in H.R. 2055; therefore, the counties that would have qualified as having persistent poverty may differ from those we identified in this review. Additionally, our work examined individual programs, but statutes sometimes applied the formula to accounts or appropriations that fund multiple programs and activities.

award to identify whether the funding for each award was used in one of the persistent-poverty counties or high-poverty ZIP codes we identified. For each program, we calculated the total amount of funding used in persistent-poverty counties and high-poverty ZIP codes, and we used these values to calculate the percentage of program funding used in these areas. We followed the same process to calculate subaward spending in high-poverty ZIP codes.¹⁰

To provide the most complete picture of where program funds have been used, some funds were counted in both our analyses of prime awards and subawards. In most cases, programs did not have sufficiently complete ZIP code-level data for both prime awards and subawards. However, 39 programs have sufficiently complete ZIP code-level data for prime awards and subawards. These programs' subawards accounted for about 11 percent of their prime awards, and 5 percent of the total subawards we analyzed. We included both the prime awards and subawards in our analyses of where funds were used, because it is not clear—based on the proposed language in H.R. 2055—whether the funds should be considered “used” at the prime award’s or the subaward’s primary place of performance. As a result, a limited proportion of funding may be counted as spending in high-poverty ZIP codes at both the prime award and subaward levels.

Our analysis was intended to assess the amount of federal program spending in persistent-poverty counties and high-poverty areas, according to publicly reported data. Therefore, it was outside of the scope of this report to assess the extent to which funds were actually used in the locations indicated by USAspending.gov data. However, we reviewed documentation published on USAspending.gov, including those related to validation procedures for prime award data and subaward data. We also reviewed previous GAO, CRS, and agency Inspectors General reports, as well as laws and regulations relevant to the reliability, validity, and intended uses of location-related data elements in USAspending.gov. In addition, we spoke with officials from the Department of the Treasury and GSA—the agencies responsible for maintaining prime award data and subaward data, respectively—about their data validation procedures for ensuring data submissions contain required information. Based on these steps, we determined that USAspending.gov data were sufficiently reliable to provide information on the amount of funds agencies have

¹⁰Subaward data from USAspending.gov only contains information on grants and contracts.

allotted to persistent-poverty counties and high-poverty ZIP codes for some programs.

We conducted this performance audit from August 2019 to July 2020 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Geographic Distribution of Persistent-Poverty Counties and High-Poverty Areas

Table 8 summarizes the number and proportion of persistent-poverty counties, high-poverty census tracts, and high-poverty ZIP codes for each state and the District of Columbia, as of 2017.¹ States with the highest and lowest numbers of each category of poverty area are as follows:

Persistent-Poverty Counties

- Mississippi, Georgia, Kentucky, Texas, and Louisiana had the largest number of persistent-poverty counties, ranging from 34 to 50.
- Mississippi, Louisiana, New Mexico, Kentucky, and Georgia had the highest proportion of persistent-poverty counties, ranging from 31 to 61 percent.²
- Sixteen states and the District of Columbia did not have any persistent-poverty counties.

High-Poverty Census Tracts

- California, New York, Texas, and Florida had the largest number of high-poverty census tracts, and also the largest number of tracts overall because they were the most populous states.
- Mississippi, Louisiana, New Mexico, Alabama, and Kentucky had the highest proportion of high-poverty census tracts, ranging from 43 to 55 percent.
- Less than 10 percent of census tracts in New Hampshire, Wyoming, and Hawaii had high poverty.

High-Poverty ZIP Codes

- Texas, California, Kentucky, Georgia, and Missouri had the largest number of high-poverty ZIP codes.
- Mississippi, New Mexico, Kentucky, Alaska, and Arkansas had the highest proportions of high-poverty ZIP codes.
- New Hampshire, Vermont, Maryland, Iowa, and Minnesota had the lowest rates of high-poverty ZIP codes, ranging from 5 to 8 percent.

¹For purposes of our analysis, persistent-poverty counties have poverty rates of at least 20 percent as measured by the 1990 and 2000 censuses and the 2017 Small Area Poverty and Income Estimates. High-poverty census tracts and ZIP codes have poverty rates of at least 20 percent as measured by the 2017 American Community Survey 5-year average.

²States with the highest proportion of persistent-poverty counties are not the same as those with the largest number of such counties because, among other things, counties vary in population and the number of counties varies by state.

**Appendix II: Geographic Distribution of
Persistent-Poverty Counties and High-Poverty
Areas**

Table 8: Persistent-Poverty Counties, High-Poverty Census Tracts, and High-Poverty ZIP Codes, by State, as of 2017

State	Persistent-poverty counties	Total counties	Percent	High-poverty census tracts	Total tracts	Percent	High-poverty ZIP codes	Total ZIP codes	Percent
AK	4	33	12%	17	167	10%	101	217	47%
AL	20	67	30%	511	1,181	43%	274	614	45%
AR	16	75	21%	276	686	40%	255	553	46%
AZ	4	15	27%	512	1,526	34%	152	388	39%
CA	3	58	5%	2,238	8,057	28%	497	1,661	30%
CO	4	64	6%	211	1,249	17%	81	486	17%
CT	0	8	0%	139	833	17%	23	261	9%
DC	0	1	0%	69	179	39%	8	25	32%
DE	0	3	0%	42	218	19%	10	60	17%
FL	4	67	6%	1,208	4,245	28%	262	961	27%
GA	49	159	31%	799	1,969	41%	310	702	44%
HI	0	5	0%	34	351	10%	13	85	15%
IA	0	99	0%	134	825	16%	75	909	8%
ID	0	44	0%	65	298	22%	49	255	19%
IL	3	102	3%	821	3,123	26%	205	1,338	15%
IN	0	92	0%	453	1,511	30%	126	736	17%
KS	1	105	1%	178	770	23%	100	669	15%
KY	44	120	37%	477	1,115	43%	391	724	54%
LA	34	64	53%	521	1,148	45%	224	495	45%
MA	0	14	0%	279	1,478	19%	55	516	11%
MD	1	24	4%	185	1,406	13%	35	427	8%
ME	0	16	0%	61	358	17%	67	408	16%
MI	1	83	1%	842	2,813	30%	196	958	20%
MN	0	87	0%	181	1,338	14%	72	864	8%
MO	16	115	14%	411	1,393	30%	303	976	31%
MS	50	82	61%	366	664	55%	231	403	57%
MT	4	57	7%	59	271	22%	82	332	25%
NC	10	100	10%	696	2,195	32%	253	779	32%
ND	3	53	6%	23	205	11%	32	345	9%
NE	1	93	1%	94	532	18%	66	561	12%
NH	0	10	0%	22	295	7%	11	236	5%
NJ	0	21	0%	353	2,010	18%	57	561	10%
NM	15	33	45%	225	499	45%	172	318	54%
NV	0	17	0%	179	687	26%	33	154	21%

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State	Persistent-poverty counties	Total counties	Percent	High-poverty census tracts	Total tracts	Percent	High-poverty ZIP codes	Total ZIP codes	Percent
NY	1	62	2%	1,312	4,918	27%	274	1,657	17%
OH	1	88	1%	964	2,952	33%	259	1,133	23%
OK	14	77	18%	362	1,046	35%	200	636	31%
OR	0	36	0%	197	834	24%	100	400	25%
PA	1	67	1%	725	3,218	23%	250	1,655	15%
RI	0	5	0%	60	244	25%	10	71	14%
SC	12	46	26%	405	1,103	37%	184	402	46%
SD	12	66	18%	43	222	19%	76	342	22%
TN	8	95	8%	530	1,497	35%	220	607	36%
TX	44	254	17%	1,805	5,265	34%	531	1,810	29%
UT	1	29	3%	87	588	15%	38	261	15%
VA	9	136	7%	332	1,907	17%	162	817	20%
VT	0	14	0%	19	184	10%	19	240	8%
WA	2	39	5%	236	1,458	16%	111	565	20%
WI	1	72	1%	260	1,409	18%	66	756	9%
WV	16	55	29%	187	484	39%	283	648	44%
WY	0	23	0%	11	132	8%	23	132	17%

Source: GAO analysis of Census, Small Area Income and Poverty Estimates, and American Community Survey data. | GAO-20-518

Appendix III: Funds Used Under H.R. 2055 Programs in Fiscal Years 2017–2019

Table 9 provides detailed information on the funds used in fiscal years 2017–2019 under each H.R. 2055 program we identified. The source of this information was USAspending.gov. The field is blank where we identified that (1) no funding award data were available, or (2) the primary place of performance data elements were not sufficiently complete for our analysis.

Table 9: Funds Used Under H.R. 2055 Programs We Identified, for Fiscal Years 2017–2019

CFDA	Program name	Total Program Prime grants and direct payments (millions of dollars)	Total Program Prime loan face value (millions of dollars)	Percent of prime awards used in persistent-poverty counties	Percent of prime awards used in high-poverty ZIP codes	Total Program Subawards (millions of dollars)	Percent of subawards used in high-poverty ZIP codes
Department of Agriculture - Rural Business Cooperative Service							
10.350	Technical Assistance to Cooperatives	–	–	–	–	–	–
10.351	Rural Business Development Grant	97.1	–	22%	–	0.12	100%
10.352	Value-Added Producer Grants	29.1	–	3%	–	–	–
10.377	Agriculture Innovation Center Demonstration Program	–	–	–	–	–	–
10.767	Intermediary Relending Program	–	52.4	8%	–	–	–
10.768	Business and Industry Loans	–	3,100	13%	–	–	–
10.771	Rural Cooperative Development Grants	26.9	–	13%	–	0.56	82%
10.773	Rural Business Opportunity Grants	11.7	–	74%	–	–	–
10.782	Appropriate Technology Transfer for Rural Areas	8.3	–	0%	–	–	–
10.854	Rural Economic Development Loans and Grants	25.9	136	8%	–	–	–
10.865	Biorefinery Assistance	–	733	0%	–	–	–
10.866	Repowering Assistance	2	–	0%	–	–	–
10.867	Bioenergy Program for Advanced Biofuels	27.5	–	2%	–	–	–
10.868	Rural Energy for America Program Loans	107	728	20%	–	0.06	100%
10.870	Rural Microentrepreneur Assistance Program Loans	8.14	15.6	11%	–	–	–

**Appendix III: Funds Used Under H.R. 2055
Programs in Fiscal Years 2017–2019**

CFDA	Program name	Total Program Prime grants and direct payments (millions of dollars)	Total Program Prime loan face value (millions of dollars)	Percent of prime awards used in persistent-poverty counties	Percent of prime awards used in high-poverty ZIP codes	Total Program Subawards (millions of dollars)	Percent of subawards used in high-poverty ZIP codes
10.871	Socially-Disadvantaged Groups Grant	6.4	–	13%	–	–	–
10.872	Healthy Food Financing Initiative	–	–	–	–	–	–
10.874	Delta Health Care Services Grant Program	8.98	–	39%	–	0.05	100%
10.890	Rural Development Cooperative Agreement Program	2.98	–	0%	–	–	–
Department of Agriculture - Rural Housing Service							
10.405	Farm Labor Housing Loans	46.6	43.3	12%	–	–	–
10.410	Very Low to Moderate Income Housing Loans	–	44,700	5%	–	–	–
10.411	Rural Housing Site Loans and Self Help Housing Land Development Loans	–	47.7	3%	–	–	–
10.415	Rural Rental Housing Loans	–	44.2	1%	–	–	–
10.417	Very Low-Income Housing Repair Loans and Grants	69.4	45.9	22%	–	–	–
10.420	Rural Self-Help Housing Technical Assistance	45.4	–	17%	–	–	–
10.427	Rural Rental Assistance Payments	3,440	2.48	17%	–	–	–
10.433	Rural Housing Preservation Grants	19.6	–	23%	–	–	–
10.438	Section 538 Rural Rental Housing Guaranteed Loans	–	436	15%	–	–	–
10.446	Rural Community Development Initiative	–	–	–	–	–	–
10.447	The Rural Development Multi-Family Housing Revitalization Demonstration Program (MPR) Loans	57.5	274	11%	–	–	–
10.448	Rural Development Multi-Family Housing Rural Housing Voucher Demonstration Program	–	–	–	–	–	–
10.766	Community Facilities Loans and Grants	134	5,220	10%	–	–	–

**Appendix III: Funds Used Under H.R. 2055
Programs in Fiscal Years 2017–2019**

CFDA	Program name	Total Program Prime grants and direct payments (millions of dollars)	Total Program Prime loan face value (millions of dollars)	Percent of prime awards used in persistent-poverty counties	Percent of prime awards used in high-poverty ZIP codes	Total Program Subawards (millions of dollars)	Percent of subawards used in high-poverty ZIP codes
Department of Agriculture - Rural Utilities Service							
10.751	Rural Energy Savings Program	–	228	3%	–	–	–
10.759	Part 1774 Special Evaluation Assistance for Rural Communities and Households	6.35		13%	–	–	–
10.760	Water and Waste Disposal Systems for Rural Communities Loans	1,800	4,020	11%	–	0.21	100%
10.761	Technical Assistance and Training Grants	74.9	–	0%	–	0.1	100%
10.762	Solid Waste Management Grants	10.7	–	6%	–	–	–
10.763	Emergency Community Water Assistance Grants	31.4	–	9%	–	–	–
10.770	Water and Waste Disposal Loans and Grants (Section 306C)	138	–	56%	–	–	–
10.850	Rural Electrification Loans and Loan Guarantees	–	10,600	12%	–	–	–
10.851	Rural Telephone Loans and Loan Guarantees	–	679	8%	–	–	–
10.855	Distance Learning and Telemedicine Loans and Grants	94.2	–	19%	–	–	–
10.858	Denali Commission Grants and Loans	6.5	–	0%	0%	–	–
10.859	Assistance to High Energy Cost Rural Communities	23.8	–	23%	–	–	–
10.862	Household Water Well System Grant Program	3.28	–	25%	–	–	–
10.863	Community Connect Grant Program	77.1	–	26%	–	–	–
10.864	Grant Program to Establish a Fund for Financing Water and Wastewater Projects	3	–	0%	–	–	–
10.886	Rural Broadband Access Loans and Loan Guarantees	–	76.3	19%	–	–	–
Commerce Department - Economic Development Administration							

**Appendix III: Funds Used Under H.R. 2055
Programs in Fiscal Years 2017–2019**

CFDA	Program name	Total Program Prime grants and direct payments (millions of dollars)	Total Program Prime loan face value (millions of dollars)	Percent of prime awards used in persistent-poverty counties	Percent of prime awards used in high-poverty ZIP codes	Total Program Subawards (millions of dollars)	Percent of subawards used in high-poverty ZIP codes
11.020	Cluster Grants	75.6	–	16%	49%	2.16	70%
11.030	Science and Research Park Development Grants		–	–	–	–	–
11.300	Investments for Public Works and Economic Development Facilities	371	–	11%	37%	4.44	89%
11.302	Economic Development Support for Planning Organizations	80.7	–	10%	38%	0.21	0%
11.303	Economic Development Technical Assistance	27.4	–	11%	58%	0.37	71%
11.307	Economic Adjustment Assistance	574	–	13%	43%	5.92	16%
11.312	Research and Evaluation Program	7.95	–	–	–	0.68	23%
11.313	Trade Adjustment Assistance for Firms	39.3	–	0%	42%	0.24	73%
Department of Education - Office of Innovation and Improvement							
84.411	Education Innovation and Research Program	432	–	11%	40%	11.3	75%
Environmental Protection Agency - EPA Grants							
66.204	Multipurpose Grants to States and Tribes	3.99	–	–	–	0.33	83%
66.817	State and Tribal Response Program Grants	98.8	–	–	–	0.64	100%
Federal Regional Commissions and Authorities - Appalachian Regional Commission							
23.001	Appalachian Regional Development	–	–	–	–	–	–
23.011	Appalachian Research, Technical Assistance, and Demonstration Projects	0.55	–	–	–	–	–
23.002	Appalachian Area Development	61.2	–	–	–	–	–
23.009	Appalachian Local Development District Assistance	–	–	–	–	–	–
Federal Regional Commissions and Authorities - Delta Regional Authority							
90.200	Delta Regional Development	–	–	–	–	–	–

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Programs in Fiscal Years 2017–2019**

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90.201	Delta Area Economic Development	56.7	–	53%	63%	–	–
90.202	Delta Local Development District Assistance	–	–	–	–	–	–
90.203	Delta Creative Place-Making Pilot Initiative	–	–	–	–	–	–
90.204	States’ Economic Development Assistance Program	–	–	–	–	–	–
Federal Regional Commissions and Authorities - Denali Commission							
90.100	Denali Commission Program	-0.49	–	–	–	–	–
90.199	Shared Services	–	–	–	–	–	–
Federal Regional Commissions and Authorities - Northern Border Regional Commission							
90.601	Northern Border Regional Development	–	–	–	–	–	–
Department of Health and Human Services - Health Resources and Services Administration							
93.011	National Organizations of State and Local Officials	–	–	–	–	–	–
93.059	Training in General, Pediatric, and Public Health Dentistry	–	–	–	–	–	–
93.107	Area Health Education Centers	4.26	–	–	–	0.29	100%
93.110	Maternal and Child Health Federal Consolidated Programs	167	–	–	–	28.1	75%
93.117	Preventive Medicine and Public Health Residency Training Program, Integrative Medicine Program, and National Center for Integrative Primary Healthcare	13.1	–	–	–	0.06	100%
93.124	Nurse Anesthetist Traineeship	9.3	–	–	–	–	–
93.127	Emergency Medical Services for Children	15.8	–	–	–	1.13	100%
93.129	Technical and Non-Financial Assistance to Health Centers	–	–	–	–	–	–
93.130	Cooperative Agreements to States/Territories for the Coordination and Development of Primary Care Offices	0.19	–	–	–	–	–

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Programs in Fiscal Years 2017–2019**

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93.134	Grants to Increase Organ Donations	7.56	–	–	–	0.23	100%
93.145	HIV-Related Training and Technical Assistance	11.2	–	–	–	0.19	37%
93.153	Coordinated Services and Access to Research for Women, Infants, Children, and Youth (B)	11.8	–	0%	–	–	–
93.155	Rural Health Research Centers	24.1	–	–	–	–	–
93.157	Centers of Excellence	12.8	–	–	–	0.75	87%
93.162	National Health Service Corps Loan Repayment Program	–	–	–	–	–	–
93.165	Grants to States for Loan Repayment Program	–	–	–	–	–	–
93.178	Nursing Workforce Diversity	44.2	–	–	–	0.25	100%
93.186	National Research Service Award in Primary Care Medicine	2.27	–	0%	–	–	–
93.191	Graduate Psychology Education	17.4	–	–	–	–	–
93.211	Telehealth Programs	215	–	–	–	2.86	52%
93.223	Development and Coordination of Rural Health Services	–	–	–	–	–	–
93.224	Health Center Program (Community Health Centers, Migrant Health Centers, Health Care for the Homeless, and Public Housing Primary Care)	44.8	–	12%	–	–	–
93.236	Grants to States to Support Oral Health Workforce Activities	12.6	–	–	–	4.51	81%
93.241	State Rural Hospital Flexibility Program	30.3	–	–	–	1.07	100%
93.247	Advanced Nursing Education Workforce Grant Program	154	–	–	–	3.87	89%
93.250	Geriatric Academic Career Awards Department of Health and Human Services	1.87	–	–	–	–	–
93.251	Universal Newborn Hearing Screening	2	–	–	–	0.03	0%

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Programs in Fiscal Years 2017–2019**

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93.253	Poison Center Support and Enhancement Grant Program	0.23	–	–	–	–	–
93.255	Children’s Hospitals Graduate Medical Education Payment Program	920	–	15%	–	–	–
93.257	Grants for Education, Prevention, and Early Detection of Radiogenic Cancers and Diseases	0.63	–	–	–	–	–
93.259	Rural Access to Emergency Devices Grant and Public Access to Defibrillation Demonstration Grant	–	–	–	–	–	–
93.264	Nurse Faculty Loan Program (NFLP)	6.71	–	–	–	–	–
93.266	Health Systems Strengthening and HIV/AIDS Prevention, Care and Treatment under the President’s Emergency Plan for AIDS Relief	46.7	–	–	–	–	–
93.288	National Health Service Corps Scholarship Program	–	–	–	–	–	–
93.300	National Center for Health Workforce Analysis	3.67	–	–	–	0.16	0%
93.301	Small Rural Hospital Improvement Grant Program	1.52	–	0%	–	–	–
93.303	NURSE Corps Scholarship Program	47.6	–	9%	–	–	–
93.329	Skills Training and Health Workforce Development of Paraprofessionals Grant Program	–	–	–	–	–	–
93.330	Leadership in Public Health Social Work Education Grant Program	0.9	–	–	–	–	–
93.342	Health Professions Student Loans, Including Primary Care Loans/Loans for Disadvantaged Students	0.056	–	–	–	–	–
93.358	Advanced Education Nursing Traineeships	–	–	–	–	–	–

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93.359	Nurse Education, Practice Quality and Retention Grants	17.5	–	–	–	2.45	38%
93.364	Nursing Student Loans	0.43	–	–	–	–	–
93.365	Sickle Cell Treatment Demonstration Program	3.12	–	0%	–	1.5	58%
93.501	Grants for School-Based Health Center Capital Expenditures	11.2	–	19%	–	0.057	100%
93.504	Family to Family Health Information Centers	0.9	–	–	–	–	–
93.505	Affordable Care Act (ACA) Maternal, Infant, and Early Childhood Home Visiting Program	3.9	–	–	–	1.56	98%
93.510	Affordable Care Act (ACA) Primary Care Residency Expansion Program	–	–	–	–	–	–
93.516	Public Health Training Centers Program	17.9	–	–	–	4	75%
93.526	Grants for Capital Development in Health Centers	–	–	–	–	–	–
93.527	Grants for New and Expanded Services under the Health Center Program	79.4	–	1%	–	–	–
93.528	National Forum for State and Territorial Chief Executives	–	–	–	–	–	–
93.530	Teaching Health Center Graduate Medical Education Payment	0.41	–	–	–	–	–
93.547	National Health Service Corps	707	–	14%	–	–	–
93.615	Maternal, Infant, and Early Childhood Home Visiting Research Programs	–	–	–	–	–	–
93.680	Medical Student Education	5.74	–	–	–	–	–
93.686	Ending the HIV Epidemic: A Plan for America — Ryan White HIV/AIDS Program Parts A and B	–	–	–	–	–	–
93.732	Mental and Behavioral Health Education and Training Grants	165	–	–	–	1.7	86%

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93.822	Health Careers Opportunity Program	26.6	–	–	–	1.15	100%
93.870	Maternal, Infant and Early Childhood Home Visiting Grant Program	1,070	–	–	–	465	84%
93.877	Autism Collaboration, Accountability, Research, Education, and Support	3	–	–	–	0.1	0%
93.884	Grants for Primary Care Training and Enhancement	22.6	–	–	–	0.63	100%
93.908	Nurse Corps Loan Repayment Program	148	–	14%	–	–	–
93.912	Rural Health Care Services Outreach, Rural Health Network Development and Small Health Care Provider Quality Improvement Program	139	–	14%	–	0.55	100%
93.913	Grants to States for Operation of State Offices of Rural Health	0.61	–	0%	–	–	–
93.914	HIV Emergency Relief Project Grants	81.7	–	2%	–	27.9	96%
93.917	HIV Care Formula Grants	170	–	–	–	126	97%
93.918	Grants to Provide Outpatient Early Intervention Services with Respect to HIV Disease	42.3	–	–	–	0.29	100%
93.923	Disadvantaged Health Professions Faculty Loan Repayment Program (FLRP)	6.5	–	14%	–	–	–
93.924	Ryan White HIV/AIDS Dental Reimbursement and Community Based Dental Partnership Grants	27.1	–	–	–	–	–
93.925	Scholarships for Health Professions Students from Disadvantaged Backgrounds	3.25	–	–	–	–	–
93.926	Healthy Start Initiative	35.5	–	–	–	1.79	99%
93.928	Special Projects of National Significance	–	–	–	–	–	–
93.932	Native Hawaiian Health Care Systems	–	–	–	–	–	–

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93.965	Coal Miners Respiratory Impairment Treatment Clinics and Services	2.03	–	0%	–	–	–
93.969	PPHF Geriatric Education Centers	14.1	–	–	–	0.07	100%
93.976	Primary Care Medicine and Dentistry Clinician Educator Career Development Awards Program	10.9	–	–	–	0.19	74%
93.994	Maternal and Child Health Services Block Grant to the States	1570	–	–	–	2,060	75%
Department of Health and Human Services - Family and Youth Services Bureau							
93.550	Transitional Living Program and Maternity Group Home	108	–	–	–	–	–
93.557	Street outreach Program	26.7	–	–	–	–	–
93.623	Basic Center Program	110	–	–	–	–	–
Department of Housing and Urban Development - Assistant Secretary for Fair Housing and Equal Opportunity							
14.408	The Fair Housing Initiatives Program under section 561 of the Housing and Community Development Act of 1987	–	–	–	–	–	–
14.279	Specialized Housing and Services for Victims of Human Trafficking	–	–	–	–	–	–
Department of Justice - Bureau of Justice Assistance							
16.738	Edward Byrne Memorial Justice Assistance Grant Program	913	–	4%	36%	186	56%
16.812	Second Chance Reentry Initiative	213	–	5%	45%	23.1	64%
16.833	National Sexual Assault Kit Initiative	147	–	5%	45%	23.7	69%
16.838	Comprehensive Opioid Abuse Grant Program	258	–	4%	34%	31.3	31%
16.839	STOP School Violence Program	98.5	–	4%	41%	4	13%
Department of Justice - Community Oriented Policing Services							
16.710	COPS ON THE BEAT program	–	–	–	–	–	–

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Department of Justice - National Institute of Justice							
16.741	DNA Backlog Reduction Program	291	–	4%	32%	13.9	87%
16.742	Paul Coverdell Forensic Sciences Improvement Grant Program	69.2	–	2%	35%	22.3	62%
Department of Justice - Office of Juvenile Justice and Delinquency Prevention							
16.123	Community-Based Violence Prevention Program	26.1	–	9%	43%	5.3	41%
16.541	Developing, Testing and Demonstrating Promising New Programs	–	–	–	–	–	–
16.542	National Institute for Juvenile Justice and Delinquency Prevention	–	–	–	–	–	–
16.543	Missing Children’s Assistance	212	–	1%	14%	4.3	82%
16.544	Youth Gang Prevention	6.82	–	0%	23%	0.5	100%
16.548	Title V Delinquency Prevention Program	–	–	–	–	–	–
16.726	Juvenile Mentoring Program	298	–	3%	22%	122	18%
16.727	Enforcing Underage Drinking Laws Program	–	–	–	–	–	–
16.731	Tribal Youth Program	17.5	–	–	–	0.25	100%
16.756	Court Appointed Special Advocates	21.3	–	0%	0%	3.5	0%
16.757	Judicial Training on Child Maltreatment for Court Personnel Juvenile Justice Programs	4.44	–	0%	100%	0.13	100%
16.758	Improving the Investigation and Prosecution of Child Abuse and the Regional and Local Children’s Advocacy Centers	49.3	–	10%	20%	10.2	4%
16.818	Children Exposed to Violence	9.19	–	0%	26%	1.1	100%
16.819	National Forum on Youth Violence Prevention	–	–	–	–	–	–

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16.821	Juvenile Justice Reform and Reinvestment Demonstration Program	1.48	–	0%	100%	0.67	100%
16.823	Emergency Planning for Juvenile Justice Facilities	1.3	–	0%	12%	–	
16.829	Juvenile Justice Education Collaboration Assistance	–	–	–	–	–	
16.830	Girls in the Juvenile Justice System	8.34	–	11%	72%	0.74	42%
16.832	Children of Incarcerated Parents Web Portal	–	–	–	–	–	
16.836	Indigent Defense	5.06	–	9%	33%	–	
16.842	Opioid Affected Youth Initiative	15	–	7%	47%	0.39	67%
16.540	Juvenile Justice and Delinquency Prevention	158	–	3%	39%	44.3	44%
16.831	Children of Incarcerated Parents	13.7	–	2%	61%	0.73	100%
Department of Justice - Office for Victims of Crime							
16.320	Services for Trafficking Victims	211	–	7%	41%	12.6	56%
16.834	Domestic Trafficking Victim Program	7.83	–	0%	0%	2.66	0%
Department of Justice - Office on Violence Against Women							
16.016	Culturally and Linguistically Specific Services Program	1.41	–	0%	36%	–	–
16.017	Sexual Assault Services Formula Program	–	–	–	–	–	–
16.018	Services to Advocate for and Respond to Youth	–	–	–	–	–	–
16.021	Justice Systems Response to Families	11.2	–	9%	16%	1	43%
16.023	Sexual Assault Services Culturally Specific Program	4.52	–	14%	60%	–	–
16.024	Tribal Sexual Assault Services Program	4.9	–	–	–	–	–
16.025	Special Domestic Violence Criminal Jurisdiction Implementation	1.91	–	–	–	–	–

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16.026	OVW Research and Evaluation Program	1.23	–	0%	0%	0.2	95%
16.027	National Clearinghouse on Sexual Assault of American Indian and Alaska Native Women	–	–	–	–	–	–
16.524	Legal Assistance for Victims	44	–	4%	47%	2	56%
16.525	Grants to Reduce Domestic Violence, Dating Violence, Sexual Assault, and Stalking on Campus	18.4	–	12%	3%	1.1	100%
16.526	OVW Technical Assistance Initiative	19.9	–	2%	13%	1.3	24%
16.527	Supervised Visitation, Safe Havens for Children	–	–	–	–	–	–
16.528	Enhanced Training and Services to End Violence and Abuse of Women Later in Life	3.36	–	0%	–	0.54	0%
16.529	Education, Training, and Enhanced Services to End Violence Against and Abuse of Women with Disabilities	3.67	–	0%	0%	0.68	65%
16.556	State Domestic Violence and Sexual Assault Coalitions	–	–	–	–	–	–
16.557	Tribal Domestic Violence and Sexual Assault Coalitions Grant Program	2.85	–	–	–	–	–
16.587	Violence Against Women Discretionary Grants for Indian Tribal Governments	34.8	–	–	–	–	–
16.588	Violence Against Women Formula Grants	–	–	–	–	–	–
16.589	Rural Domestic Violence, Dating Violence, Sexual Assault, and Stalking Assistance Program	34.8	–	11%	–	2.1	49%
16.590	Grants to Encourage Arrest Policies and Enforcement of Protection Orders Program	38.9	–	9%	47%	3.8	48%

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16.684	Supporting Teens through Education and Protection Act of 2005 (STEP Act)	–	–	–	–	–	–
16.736	Transitional Housing Assistance for Victims of Domestic Violence, Dating Violence, Stalking, or Sexual Assault	32.1	–	4%	28%	0.48	11%
16.888	Consolidated And Technical Assistance Grant Program to Address Children and Youth Experiencing Domestic and Sexual Violence and Engage Men and Boys as Allies	6.15	–	12%	52%	0.75	100%
16.889	Grants for Outreach and Services to Underserved Populations	2.25	–	0%	61%	0.36	73%
Department of Justice - Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking							
16.840	Keep Young Athletes Safe	4.53	–	0%	0%	–	–
Department of Labor - Employment and Training Administration							
17.201	Registered Apprenticeship	1.51	–	0%	–	4.04	86%
17.207	Employment Service/Wagner-Peyser Funded Activities	2120	–	–	–	98.8	95%
17.235	Senior Community Service Employment Program	1170	–	0%	–	222	82%
17.245	Trade Adjustment Assistance	1150	–	–	–	61.3	93%
17.258	WIOA Adult Program	3130	–	–	–	1810	94%
17.259	WIOA Youth Activities	972	–	–	–	2840	96%
17.261	WIOA Pilots, Demonstrations, and Research Projects	26.8	–	–	–	0.61	67%
17.264	National Farmworker Jobs Program	247	–	–	–	123	66%
17.265	Native American Employment and Training	95.6	–	23%	–	–	–
17.268	H-1B Job Training Grants	299	–	–	–	71.7	85%
17.270	Reentry Employment Opportunities	273	–	8%	–	27	96%

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17.271	Work Opportunity Tax Credit Program (WOTC)	36.8	–	–	–	–	–
17.272	Permanent Labor Certification for Foreign Workers	–	–	–	–	–	–
17.273	Temporary Labor Certification for Foreign Workers	43.7	–	–	–	–	–
17.274	YouthBuild	243	–	–	–	1.95	70%
17.276	Health Care Tax Credit (HCTC) National Emergency Grants (NEGs)	–	–	–	–	–	–
17.277	WIOA National Dislocated Worker Grants/WIA National Emergency Grants	353	–	7%	–	277	93%
17.278	WIOA Dislocated Worker Formula Grants	3820	–	–	–	1600	93%
17.280	WIOA Dislocated Worker National Reserve Demonstration Grants	22	–	9%	–	14.1	100%
17.281	WIOA Dislocated Worker National Reserve Technical Assistance and Training	13.7	–	15%	–	–	–
17.282	Trade Adjustment Assistance Community College and Career Training (TAACCCT) Grants	–	–	–	–	–	–
17.283	Workforce Innovation Fund	–	–	–	–	–	–
17.285	Apprenticeship USA Grants	188	–	–	–	16	94%
17.286	Hurricanes and Wildfires of 2017 Supplemental - National Dislocated Worker Grants	98.3	–	0%	–	–	–
17.287	Job Corps Experimental Projects and Technical Assistance	17.3	–	–	–	–	–
Department of Transportation - Federal Transit Administration							
20.500	Capital Investment Grants Program	3110	–	–	–	402	100%
20.526	Bus and Bus Facilities Infrastructure Investment Program	5400	–	–	–	1140	97%
Department of Transportation - Office of the Secretary							

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20.933	National Infrastructure Investments	1180	–	–	–	65.5	100%
20.934	Nationally Significant Freight and Highway Projects	24.1	–	–	–	–	–
Treasury Department - CDFI Fund							
21.011	Capital Magnet Fund	354	–	–	–	–	–
21.012	Native Initiatives	32.2	–	–	–	–	–
21.014	Community Development Financial Institutions Bond Guarantee Program	475	–	–	–	–	–
21.020	Community Development Financial Institutions Program	564	8.67	–	–	–	–
21.021	Bank Enterprise Award Program	91	–	–	–	–	–

Source: GAO analysis of USAspending.gov data. | GAO-20-518

Note: In Table 9, (–) is used in cases where we found that (1) no funding award data were available, or (2) the primary place of performance data elements were not sufficiently complete for our analysis of the percentage of funds used in persistent-poverty counties and high-poverty ZIP codes.

Appendix IV: GAO Contacts and Staff Acknowledgments

GAO Contacts

William B. Shear at (202) 512-8678 or shearw@gao.gov.

Staff Acknowledgments

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