Utilizing American Rescue Plan Funds to Serve Refugee and Immigrant Communities

Photo Credit: World Relief Spokane / Viktorya Aleksandrov

2022 Guide
Introduction

Signed by President Biden on March 11, 2021, the American Rescue Plan Act (ARPA) appropriated approximately $1.9 trillion to provide relief to address the impact of the COVID-19 pandemic. These allocations included aid for small businesses, direct stimulus funds to households, rental and income assistance, access to medical care and mental health services, and infrastructure aid. In addition, out of the roughly $1.9 trillion, $350 billion was reserved for states, localities, and tribal governments. State and local governments have broad discretion in how they can utilize state and local fiscal recovery funds (SLFRF) to alleviate the harmful effects of the COVID-19 pandemic.

One of the primary goals of ARPA is to encourage investment in communities hit the hardest by the COVID-19 pandemic, namely, underserved and underprivileged communities of color, such as immigrants and refugees. State and local governments have an unprecedented and unique opportunity to address the inequalities laid bare during the pandemic by investing in programs and services that address longstanding needs in these underserved communities. Furthermore, states and localities can determine their own eligibility criteria for SLFR funded programs, and can do so in a manner that is inclusive of all immigrants and refugees regardless of immigration status or length of residency.

This guide is intended to assist immigrant and refugee advocates and service providers in identifying potential funding opportunities through ARPA. Several states and localities have either not yet allocated any SLFRF resources at all or have only partially allocated such funds. Some states and localities are still collecting feedback from communities on how such funds should be dispensed. Therefore, there remain significant opportunities for advocates to mobilize and request ARPA funds to be directed towards refugee and immigrant support programing.
Mobilizing for ARPA Funds: A Checklist for Refugee and Immigrant Service Providers and Advocates

The below checklist serves as an abbreviated guide for refugee and immigrant service providers and advocates. The remainder of this document provides greater context and detail on ARPA funding sources to better inform and equip advocates as they engage with state and local governments.

Stage 1 – Inform Your Advocacy

☐ Determine the amount of SLFR funds being allocated to your state and locality (including county and city if applicable).
  - Understanding the amount of funds available can help you determine how much funding to ask for. The Treasury Department publishes allocations to states, territories, counties, and metropolitan areas here. See also p.4 of this report for other ways to look up this information.

☐ Determine how much SLFR funds your state or locality has already expended and on what type of programs.
  - If your state and locality have not directed any funds towards assisting immigrant and refugee communities, that information can help you advocate for allocations. You can usually find this information by searching online for your state or local recovery plan or contacting your elected officials or relevant state, county or city agencies. If your state or locality has an Office for New Americans, start there.

☐ Find out if your state or locality is collecting community feedback on how to use SLFRFs.
  - Some states and localities have created opportunities for public input through community consultations, online surveys, public hearings, and other means.
  - If your state or locality has not sought public input, demand that such opportunities be provided. Request that any surveys or public hearings be accessible and that translation/interpretation be made available so elected leaders can hear from all impacted communities.

Stage 2 – Organize and Mobilize

☐ Establish a coalition of community organizations and members to advocate for SLFRF resources to be allocated towards services and programs that assist immigrants and refugees.
  - A useful toolkit containing examples and tips on how advocates can mobilize effectively for ARPA funds is available here.

☐ Educate and mobilize individual community members to advocate for more programs and services for refugees and immigrants.
  - While created for communities in Indiana, this helpful toolkit can be applied to other locales.

☐ Request meetings with legislators, mayors, governors, and state/county/city agencies to advocate for SLFRFs to be used for services that address the needs of refugees and immigrants.
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- Prepare relevant talking points and have a clear ask of the amount you are seeking, which organizations are requesting the funds, and what eligible services and programs will be provided through such allocations.
- Emphasize that one of the primary goals of ARPA is to support an equitable economic recovery that uplifts low-income communities and people of color.
- Emphasize that the eligibility requirements of any existing or future ARPA-funded programs should not exclude refugee and immigrant populations. ARPA contains no requirements with regards to recipients’ immigration status or length of residency in a state/locality, criteria which often exclude recent refugees and undocumented immigrants. ARPA leaves it to states and localities to specify eligibility requirements, and such requirements ought to be highly flexible, especially with regards to what constitutes acceptable documentation when establishing eligibility for programs.
- Some states and localities may have not applied for additional available ARPA funding (i.e. the Good Jobs Challenge). Be prepared to assist in preparing and submitting such applications.

☐ Attend state and local budget hearings, and provide testimony on the importance of allocating SLFRFs towards the needs of immigrant and refugee communities.

Stage 3 – Share your Successes and Challenges

If you successfully obtain funding from your state or locality, please let us know at info@refugeeadvocacylab.org and share your success with other advocates, along with tips and best practices. If you face challenges, have questions, or need support, please reach out to the Refugee Advocacy Lab for further technical assistance at balqees@refugeeadvocacylab.org.
States and Localities have Broad Discretion to Allocate ARPA Funds

Of the $350 billion SLFRFs, $195.3 billion is allocated for states, and an additional $130.2 billion is allocated as direct funding to qualifying local and tribal governments. The first tranche of funding became available in May 2021. The second tranche of SLFRFs will be distributed after May 10, 2022. Funds do not have to be obligated until December 31, 2024, and unexpended funds are not subject to recapture or return until December 31, 2026.¹

The amount of funding each locality receives is determined by a formula set out in ARPA. The Treasury Department publishes the amounts allocated to states, territories, counties, and metropolitan areas here. For state allocations, the National Academy for State Health Policy has a helpful map of how much ARPA funds states have obligated. The National Conference of State Legislatures also tracks state ARPA spending. Finally, the National League of Cities publishes non-final estimates of local ARPA allocations here.

States and localities have broad discretion to allocate ARPA funds. The Act describes four acceptable uses for SLFRFs:

1. to respond to the COVID-19 emergency or its negative economic impacts, including assistance to households, small businesses, and nonprofits, or aid to impacted industries such as tourism, travel, and hospitality;
2. to provide hazard pay or other support to essential workers and their employers;
3. to maintain government services impacted by a shortfall in public sector revenues as a result of the COVID-19 emergency; or
4. to make necessary investments in water, sewer, or broadband infrastructure.²

The U.S. Department of the Treasury initially published an Interim Final Rule that detailed how states and localities may disburse state and local recovery funds.³ It subsequently published a Final Rule on January 6, 2022 (effective April 1, 2022), which further broadens the discretion of states and localities to utilize SLFRFs for a wider range of uses. Both Rules reiterate that ARPA is purposefully broad in order to allow flexibility to respond to the unique negative impacts of the pandemic faced by states and localities. To award ARPA funds, states and localities must “identify a need or negative impact of the COVID-19 public health emergency and, second, identify how the program, service, or other intervention addresses the identified need or impact.” Thus, so long as the funding allocation is “in response to the disease itself or the harmful consequences of the economic disruptions resulting from or exacerbated by the COVID–19 public health emergency,” then it constitutes a valid use of the funds.

The Final Rule enumerates several types of programs and services that are presumed to qualify for SLFR funds. Some examples include:

- Food assistance & food banks
- Cash assistance

• **Emergency housing assistance**, including rental assistance, mortgage assistance, utility assistance, assistance paying delinquent property taxes, counseling and legal aid to prevent eviction and homelessness & emergency programs or services for homeless individuals, including temporary residences for people experiencing homelessness

• **Programs to support long-term housing security**, including development of affordable housing and permanent supportive housing

• **Mental health and substance/addiction programs**

• **Health insurance coverage expansion**

• **Benefits for surviving family members of individuals who have died from COVID-19**, including support for burials

• **Workforce and job training**, including job training, public jobs programs and fairs, support for childcare and transportation to and from a jobsite or interview, incentives for newly employed workers, subsidized employment, grants to hire underserved workers, assistance to unemployed individuals to start small businesses & development of job and workforce training centers

• **Financial services for the unbanked and underbanked**

• **Home repair & home weatherization**

• **Internet access and digital literacy programs**, including subsidies for costs of access

• **Paid sick, medical, and family leave programs**

• **Programs to improve access to public benefits or services**

• **Childcare and early learning services**, home visiting programs, services for child welfare involved families and foster youth & childcare facilities

• **Programs to address learning loss for K-12 students** (e.g., high-quality tutoring, differentiated instruction)

• **Environmental remediation**

• **Construction of schools and hospitals**

• **Community violence intervention programs**

**ARPA Prioritizes Underserved Populations**

One of the primary goals of ARPA is to “lay the foundation for a strong, equitable economic recovery... by addressing the systemic public health and economic challenges that may have contributed to more severe impacts of the pandemic among low-income communities and people of color.” Immigrants and refugees frequently come from racial, ethnic, and socio-economically disadvantaged backgrounds, representing an intersection of factors that put them at greater risk for COVID-19. Language barriers and a lack of access to translated health information also rendered this population more vulnerable.

Any vulnerable group identified by the Center for Disease Control and Prevention (CDC) as disproportionately impacted by the COVID-19 pandemic are presumed to qualify for SLFRF support. Recently resettled refugees, for example, are specifically identified by the CDC as especially vulnerable and therefore qualify as recipients of ARPA funding. In addition, services provided to communities that reside in Qualified Census Tract are also automatically presumed to qualify.

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6 Id.

7 Id.
State and local governments must prioritize disadvantaged communities of color in the distribution of ARPA funding. Several states and localities have already outlined plans to aggressively tackle social and racial inequality in their COVID-19 recovery plans.\(^8\)

During the pandemic, organizations that serve refugee and immigrant populations strained to assist these impacted communities by providing assistance related to obtaining housing, food, public benefits, and COVID-19 related health information, among other services. Even prior to the pandemic, these community organizations or resettlement agencies often assisted immigrants and refugees in obtaining employment, language training, and workforce development, all of which are services that now would generally qualify for ARPA funds.

In addition, refugee resettlement agencies and affiliates have the added benefit of welcoming and supporting newcomers that revitalize cities and towns, reinvigorating their economies and often serving in positions as essential workers. As states and localities recover economically from the COVID-19 pandemic, lawmakers can seize this opportunity to revitalize their communities through rebuilding refugee infrastructure.

Finally, ARPA permits states and cities to directly transfer funds to private nonprofit organizations or a special-purpose unit of state or local government. Thus, nonprofit organizations servicing refugees and immigrants are uniquely positioned to receive these funds directly.\(^9\)

### How States are Allocating ARPA Funds to Support Refugees and Immigrants

While the vast majority of states and localities are still in the process of allocating ARPA funding, some states have already started making allocations to nonprofits or government agencies that serve immigrant and refugee populations. Several states have announced broad plans to allocate ARPA funds towards equity programming to benefit historically disadvantaged and underserved communities, including immigrants and refugees. While details are still emerging, such programming is described to include resources for English language learners, workforce development programs, digital access and literacy, and housing support, among others.\(^10\) In addition, the influx of ARPA funds has allowed some states the fiscal flexibility to release state and local funds (non-SLFRF) for refugee and immigrant programming.\(^11\)

#### 1) Opportunities for Advocacy

As states and localities embark on the FY 2023 budget process and beyond, there is an opportunity for refugee and immigrant advocates to push for increased programming and funding.

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Even in states and localities that have announced some funding allocations, it remains highly likely that their SLFRFs remain largely unspent. For example, New York has allocated approximately $5 million towards refugee resettlement through state and gubernatorial funding, but the vast majority of its SLFR funding is projected to be allocated in the 2022-2023 budget.\(^\text{12}\)

Additionally, many states are allocating SLFRFs into existing social programs, which can sometimes exclude certain immigrants or recently resettled refugees due to, for example, documentation or residency requirements. It is important when conducting advocacy for the allocation of ARPA funds, that state and local governments are reminded to ensure programming does not exclude refugee and immigrant populations. It is also important to note that ARPA contains no requirements with regards to recipients’ immigration status, and several states and localities have disbursed funding to undocumented individuals.\(^\text{13}\)

Finally, many states and localities are allocating funds in a manner that focuses heavily on services linked directly to the COVID emergency such as healthcare-related initiatives. As states and localities prepare to disburse ARPA funds in upcoming legislative sessions, it is important to emphasize that ARPA funding can be spent on a wider variety of much-needed programming, including translation/interpretation services, digital access and literacy, and workforce development.

2) Examples of State and Local Allocations

The below table includes some examples\(^\text{14}\) of how states and localities have allocated funds towards refugee and immigrant programs in 2021:

<table>
<thead>
<tr>
<th>State or City</th>
<th>Investment Type</th>
<th>Allocation</th>
<th>Funding Source</th>
<th>Program Description</th>
<th>Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>California</td>
<td>Afghan Refugee Resettlement Services</td>
<td>$10,000,000</td>
<td>General Fund</td>
<td>Services to assist Afghan refugees.</td>
<td>S.B. 170, § 19.57(e)(5)(G)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>$16,700,000</td>
<td>General Fund</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Illinois</td>
<td>Refugee Case Management</td>
<td>$1,500,000</td>
<td>ARPA</td>
<td>Resettlement services.</td>
<td>S.B. 2800, § 330</td>
</tr>
<tr>
<td></td>
<td>Immigrant Integration Services</td>
<td>$14,000,000</td>
<td>ARPA</td>
<td>Income assistance services and other related services.</td>
<td>S.B. 2800, § 405</td>
</tr>
<tr>
<td>Minnesota</td>
<td>Equity Programming - Adult Education</td>
<td>$10,000,000</td>
<td>ARPA</td>
<td>This grant supports Adult Basic Education Programs and includes a focus on English Language Learners.</td>
<td>Minnesota Recovery Plan - July 2021</td>
</tr>
<tr>
<td>New York</td>
<td>Refugee Resettlement Services</td>
<td>$2,000,000</td>
<td>Gubernatorial Funds</td>
<td>Services to assist Afghan refugees.</td>
<td>Press Release</td>
</tr>
<tr>
<td></td>
<td></td>
<td>$3,000,000</td>
<td>General Fund</td>
<td></td>
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\(^\text{13}\) For e.g New Jersey, Oregon, Seattle, WA, and Iowa City (proposed).

\(^\text{14}\) This chart excludes federal Office of Refugee Resettlement (ORR) funded programs or states/localities which preemptively funded programs in anticipation of ORR funding. It only includes examples of ARPA funded programs or state-funded programs in 2021.
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### Oregon

<table>
<thead>
<tr>
<th>Services</th>
<th>Amount</th>
<th>Fund</th>
<th>Description</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Refugee Resettlement Services</td>
<td>$18,238,662</td>
<td>General</td>
<td>For short-term food and shelter, case management services, rental assistance, immigration, and legal services, and interpretation classes for refugees from Afghanistan.</td>
<td>§ 28-29</td>
</tr>
<tr>
<td>Equity Programming</td>
<td>~$1.2 billion</td>
<td>ARPA</td>
<td>Oregon has allocated this amount to aggressively tackle issues of racial equity more broadly, including addressing the needs of immigrants and refugees.</td>
<td>ARPA Performance Report</td>
</tr>
</tbody>
</table>

### Vermont

<table>
<thead>
<tr>
<th>Services</th>
<th>Amount</th>
<th>Fund</th>
<th>Description</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Refugee Resettlement Services</td>
<td>$700,000</td>
<td>ARPA</td>
<td>(1) Interpretation and translation services related to COVID-19, including accessing testing and vaccines; (2) purchasing laptops and providing digital literacy for households to ensure that children can attend school remotely, that families can access telehealth services, and that adult family members can find employment; (3) providing case management services related to an increased need related to housing assistance, workforce development, and employment coaching; and (4) providing navigation of Reach Up, 3SquaresVT, and other public assistance programs following job losses</td>
<td>§ 10</td>
</tr>
</tbody>
</table>

### Louisville, KY

<table>
<thead>
<tr>
<th>Services</th>
<th>Amount</th>
<th>Fund</th>
<th>Description</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equity Programming - Cash Assistance</td>
<td>$225,000</td>
<td>ARPA</td>
<td>This grant covered cash assistance to households from multicultural communities and was administered through a refugee resettlement affiliate and cultural organizations that primarily serve African immigrants and refugees.</td>
<td>ARP Recovery Plan Performance Report</td>
</tr>
<tr>
<td>Equity Programming - Small Business Assistance</td>
<td>$50,000</td>
<td>ARPA</td>
<td>This grant provides training assistance to immigrant owned businesses through the New American Business Association</td>
<td>ARP Recovery Plan Performance Report</td>
</tr>
</tbody>
</table>

### Seattle, WA

<table>
<thead>
<tr>
<th>Services</th>
<th>Amount</th>
<th>Fund</th>
<th>Description</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equity Programming - Cash Assistance</td>
<td>$25,000,000</td>
<td>ARPA</td>
<td>(This amount was granted to the Office of Immigrant and Refugee Affairs to distribute cash assistance to underserved communities, including immigrants and refugees.</td>
<td>Ord. No. 126372</td>
</tr>
</tbody>
</table>
Other ARPA Funding Sources (non-SLFRFs)

Separate from SLFRFs, ARPA also contains allocations for specific programming for which states and localities can apply. While not exhaustive, the following sections outline available funding for certain programming that might be relevant to refugees and immigrant service providers.

1) Workforce Development

Congress organized the workforce development and economic adjustment component of ARPA via a broad, $3 billion grant to the Economic Development Administration (EDA) to remain available until September 30, 2022. The EDA in turn has set up “challenges” and grant programs to award applying states and localities funds if certain criteria are met. Refugee and immigrant service providers can advocate for states and localities to apply for these programs to either support existing workforce development programs or establish new programs.

a) Good Jobs Challenge

The EDA website describes the Good Jobs Challenge as a skills training program to support the recovery effort by providing industry-led training programs, designed to provide skills for and connect unemployed or underemployed workers to existing and emerging job opportunities. The program allocates $500 million towards this effort, and hopes to particularly target “historically underserved populations and areas, communities of color, women, and other groups facing labor market barriers such as persons with disabilities, disconnected youth, individuals in recovery, individuals with past criminal records, including justice-impacted and reentry participants, serving trainees participating in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) and Women, Infants and Children (WIC), and veterans and military spouses.” The ultimate goal of the program is to provide workers with the skills to secure a union job or a quality job that provides good pay, benefits, and growth opportunities.

Eligible applicants include: state, county, city, or other political subdivision of a state, including a special purpose unit of a state or local government, engaged in economic or infrastructure development activities, or a consortium of political subdivisions. Nonprofit affiliates of states or local governments can also apply. The application deadline is February 10, 2022.

b) Economic Adjustment Assistance Program

The Economic Adjustment Assistance program is EDA’s most flexible program, and grants made under this program are intended to provide employment for underserved communities through construction or non-construction projects designed to meet local needs. Eligible programs include a wide range of technical, planning, workforce development, entrepreneurship, and public works and infrastructure projects.
Applicants are required to outline the steps that they will take to ensure the economic benefits of these projects will support local communities where the projects take place, including any underserved communities. Eligible applicants include states, counties, cities, or other political subdivisions of a state, including a special purpose unit of a state or local government engaged in economic or infrastructure development activities, or a consortium of political subdivisions.

The program has a rolling application deadline, but the EDA strongly advises that applications are submitted no later than March 31, 2022.

2) Emergency Rental Assistance

Congress enacted two separate Emergency Rental Assistance (ERA) programs. The first program, referred to as ERA1, provides up to $25 billion under the Consolidated Appropriations Act, 2021, which was enacted on December 27, 2020, and the second, ERA2, enacted in ARPA, provides up to $21.55 billion. ERA1 funds generally expire on September 30, 2022. ERA2 funds expire on September 30, 2025. The Treasury Department may recapture “excess funds” beginning on September 30, 2021, and re-obligate these to other grantees that have spent at least 65 percent of their funds.

According to the National Multifamily Housing Council, as of August 2021, less than 17 percent of the $46 billion allocated under both ERA1 and ERA2 had been disbursed nationally. In response, the Treasury Department released ERA1 reallocation guidance in October 2021, which gives states an opportunity to use unspent funds subject to certain conditions. The National Low Income Housing Coalition (NLIHC) published a helpful fact sheet on ERA1 reallocations.

While some states have exhausted their ERA funding, several states have lagged behind considerably. In response, the White House has pressured states such as Georgia, Arizona, Wisconsin and other states to shift approximately $875 million to cities and counties where the money is needed most. As such, new funding may be available at the local level in several states.

Switchboard, an organization funded by the Office of Refugee Resettlement to serve as a one-stop resource hub for refugee service providers, recently published a blog post containing helpful guidance on how refugee service providers can work with state and local governments and community organizations to ensure refugees can access Emergency Rental Assistance funds.

3) Broadband Access

Initially appropriated under the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA), the $3 billion Emergency Broadband Benefit (EBB) was established to assist households in accessing affordable internet service as well as obtaining discounts to purchase laptops, desktop computers or tablets. This program also received additional funding from ARPA. The program was made permanent by the recently passed

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Infrastructure Investment and Jobs Act (Infrastructure Act), which infused an additional $14 billion into the program. EBB has now been renamed the Affordable Connectivity Program, and the Federal Communications Commission (FCC) has commenced the process to establish a permanent program.

Currently, the program provides a discount of up to $50 per month towards broadband service for eligible households and up to $75 per month for households on qualifying Tribal lands. Eligible households can also receive a one-time discount of up to $100 to purchase a laptop, desktop computer, or tablet from participating providers.

4) Mental Health and Substance Abuse Programs

ARPA contains several allocations to support mental health and substance abuse programs. The Department of Health and Human Services (HHS) has allocated $3 billion of ARPA funding to its Substance Abuse and Mental Health Services Administration (SAMHSA) Block Grant Program, with over $2 billion already distributed to date. In addition, SAMHSA is administering approximately $420 million dollars in ARPA supplemental funding to Certified Community Behavioral Health Clinics (CCBHC) throughout FYs 2022 and 2023.

CCBHCs are a provider type in Medicaid that provide a comprehensive range of mental health and substance use disorder services to vulnerable individuals. Services are provided free of charge, regardless of a recipient’s residency or whether they are on Medicaid. CCBHCs are non-profit organizations or units of a local government behavioral health authority. Several CCBHC’s have received ARPA funded grants to respond to the additional mental health needs brought on by the COVID-19 pandemic. To be designated as CCBHCs, clinics are required to provide culturally responsive care, among several other requirements. Refugee and immigrant service providers and advocates can reach out to CCBHCs in their state or locality to collaborate on potential programing utilizing ARPA funds.
Conclusion

As several states and localities prepare to allocate SLFRF resources this upcoming year, the time to advocate for investments in impacted refugee and immigrant communities is now. These communities bore the brunt of the COVID-19 pandemic, which exacerbated already existing systemic inequalities. Whether it is access to English language learner programs, employment training, education, digital access, and literacy, rental or income assistance, or affordable childcare – these are all investments that states and localities can make utilizing SLFRF resources. Refugee and immigrant service providers and advocates must ensure that this unique opportunity is not lost due to government failure to obligate these funds or inattention to the needs of refugees and immigrants.

Additional Resources

For more information about the work of the Refugee Advocacy Lab please visit our website. If you have specific questions or would like support in designing a new policy and advocacy strategy, please contact:

- Balqees Mihirig, Senior Policy Counsel with IRAP & Lab Policy Advisor
  - Email: Balqees@refugeeadvocacylab.org
- Genevieve Kessler, Director of State Advocacy with IRC & Lab State Strategy Lead
  - Email: Genevieve@refugeeadvocacylab.org

Acknowledgments
With appreciation to the following members of IRAP law student chapters for their research assistance:

- Ross Marchand, J.D. Candidate, 2023, University of Virginia School of Law
- Yi Ren, LL.M. Candidate, 2022, Berkeley School of Law
- Andrew Shaeffer, J.D. Candidate, 2024, University of Virginia School of Law