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EMERGENCY FOOD AND SHELTER NATIONAL BOARD PROGRAM

Clarification Guidance for Fiscal Years 2021, 2022 and 2023 Appropriations



This document is designed to offer assistance and clarity in administering the Emergency Food and Shelter Program (EFSP). It should provide answers to some questions regarding the National Board’s decision to administer Phases 39, ARPAP, 40 and 41 almost concurrently.

- Phase 39 (Fiscal Year 2021) \$130 million
- Phase ARPAP (Fiscal Year 2021) \$400 million
- Phase 40 (Fiscal Year 2022) \$130 million
- Phase 41 (Fiscal Year 2023) \$130 million

Why are Phases 39, ARPAP, 40 and 41 being administered simultaneously?

Due to the delay in the receipt of funds, the EFSP National Board has decided to run Phases 39, ARPAP, 40 and 41 almost concurrently. It is believed this will make it easier for Local Boards and LROs to administer the four phases and prevent further delays in releasing funds to communities.

How does this effect the Spending Periods for Phases 39, ARPAP, 40 and 41?

- **Phase 39** - The begin date for Phase 39 is November 1, 2021 for all jurisdictions.
- **Phase ARPAP** - The begin date for Phase ARPAP is November 1, 2021 for all jurisdictions.
- **Phase 40** - The begin date for Phase 40 is November 1, 2021 for all jurisdictions.
- **Phase 41** - The begin date for Phase 41 is October 1, 2022 for all jurisdictions.
- **Spending Period End Date** - **Currently, the end date for all Phases will be the same date.** Spending period end date options are listed below. *The begin spend date for Phase 41 is October 1, 2022, the earliest spending period end date option for the phase would be October 31, 2022. The latest a jurisdiction may spend funds will be December 31, 2024.*

November 30, 2021	January 31, 2023	January 31, 2024
December 31, 2021	February 28, 2023	February 29, 2024
January 31, 2022	March 31, 2023	March 31, 2024
February 28, 2022	April 30, 2023	April 30, 2024
March 31, 2022	May 31, 2023	May 31, 2024
April 30, 2022	June 30, 2023	June 30, 2024
May 31, 2022	July 31, 2023	July 31, 2024
June 30, 2022	August 31, 2023	August 31, 2024
July 31, 2022	September 30, 2023	September 30, 2024
August 31, 2022	October 31, 2023	October 31, 2024
September 30, 2022	November 30, 2023	November 30, 2024
October 31, 2022	December 31, 2023	December 31, 2024
November 30, 2022		
December 31, 2022		

IMPORTANT: Local Boards must select the spending period end date for the jurisdiction when the Local Board Plan is

submitted. If the Local Board does not select a date, the spending period end date will default to December 31, 2024 for the jurisdiction. The end date selected on the Phase 41 Local Board Plan will also apply to Phases 39, ARPAN and 40. Local Boards do not have to submit a separate request to extend the Phases 39, ARPAN and 40 spending periods if the jurisdiction is funded in Phase 41.

If it is necessary to extend the jurisdiction's spending period *after* the Local Board Plan has been received and processed by EFSP staff, the **Spending Period End Date Extension Request Form** will be made available with the options on the EFSP website. Initially, all spending period selections will be received and processed based on the Local Board Plan. Should the Local Board need to extend the jurisdiction's spending period at a later date to allow Local Recipient Organizations (LROs) time to make expenditures, all of the options to extend up through December 31, 2024 will be reflected on the Phase 39, ARPAN, 40 and 41 **Spending Period End Date Extension Request Form** available on the EFSP website.

1. **Jurisdictions funded in all four Phases 39, ARPAN, 40 and 41** - If a jurisdiction was funded in all four Phases 39, ARPAN, 40 and 41, the spending period selection submission with the Phase 41 Local Board Plan will apply to all spending cycles. Should the Local Board make a change at a later date by submitting a Phase 39, Phase ARPAN, Phase 40 or Phase 41 **Spending Period End Date Extension Request Form**, the change will apply to all Phases.
2. **Jurisdictions funded in three of the four Phases** - If a jurisdiction was funded in three of the four phases, Phases 39, ARPAN, 40 and 41, the spending period selection submitted with the latest Local Board Plan will apply to all spending cycles. Should the Local Board make a change at a later date by submitting a **Spending Period End Date Extension Request Form**, the change will apply to all Phases.
3. **Jurisdictions funded in two of the four Phases** - If a jurisdiction was funded in two of the four phases, Phases 39, ARPAN, 40 and 41, the spending period selection submitted with the latest Local Board Plan will apply to both spending cycles. Should the Local Board make a change at a later date by submitting a **Spending Period End Date Extension Request Form**, the change will apply to both Phases.
4. **Jurisdictions funded in one of the four Phases** - If a jurisdiction was funded in one of the four phases, the spending period selection submitted with the Local Board Plan will apply. The Local Board can make a change at a later date by submitting a **Spending Period End Date Extension Request Form** for the phase.

When will the Phases 39, ARPAN, 40 and 41 Local Board Plans be due to the National Board?

Phase 41 - A complete Local Board Plan for Phase 41 must be submitted to the National Board by **April 30, 2024**. All deadlines will be made available on the EFSP website, including the due date to submit the Local Board Plan for processing and subsequent release of funds.

Phase 40 - The deadline to submit Phase 40 Local Board Plans for jurisdictions qualifying via the National Board's funding formula was **March 13, 2023**. However, Board Plans may still be submitted to the National Board for processing until further notice.

Phases 39 and ARPAN - The deadline to submit Phases 39 and ARPAN Local Board Plans for jurisdictions qualifying via the National Board's funding formula was **March 11, 2022**. However, Board Plans may still be submitted to the National Board for processing until further notice.

REMINDER: Local Boards are required to allow additional time for interested organizations to submit applications for funding. Due to this change, the National Board determined that Local Boards should be given additional time to submit their Board Plans. Rather than Board Plans being due to the National Board 25 days after they are made available to Local

Boards, they are now due **30 days** after they are made available to Local Boards.

Will Local Boards have to advertise the availability of funds?

Yes. Local Boards must advertise the availability of funds to the jurisdiction, as required per EFSP guidelines. Prior advertisements for **Phases 39, ARPAP, and 40 award announcements will not be accepted for Phase 41**. However, if a jurisdiction received awards in more than one phase, a single advertisement announcing the award amounts may be acceptable.

IMPORTANT: Local Boards are required to allow interested organizations at least **10** business days to submit applications from the advertisement date. The National Board determined that Local Boards should be given additional time to submit their Board Plans. Rather than Board Plans being due to the National Board 25 days after they are made available to Local Boards, they are now due **30 days** after they are made available to Local Boards.

Will Local Boards and LROs have to submit new certifications to receive funds in each Phase?

Yes. All required certifications must be submitted each phase per program guidelines. The certifications required are Phase specific. Certifications must be submitted for each Phase - 39, ARPAP, 40 and 41.

1. **Local Board Plan Certification** - The Local Board Chair must complete and e-sign the form. The form must also be e-signed by any other designated signers on the Local Board roster.
2. **LRO Certification** - Each funded LRO must e-sign their LRO Certification form. Funds cannot be released to an agency without the LRO Certification.
3. **Lobbying Certification** - Every agency awarded \$100,000 or more must e-sign the Certification Regarding Lobbying.
4. **Fiscal Agent/Fiscal Conduit Certification** - A sub-recipient receiving the benefit of EFSP funds, must complete and e-sign the Fiscal Agent/Fiscal Conduit Certification form.

REPORTING

Will Phases 37, CARES and 38 Final Reports be required prior to the release of Phases 39, ARPAP, 40 and 41 funds?

Yes. Phases 37, CARES and 38 Final Reports will be required prior to the release of Phases 39, ARPAP, 40 and 41 funds. *If an LRO has an outstanding compliance exception in any prior Phase, including Phases 37, CARES and 38, or any jurisdiction, funds cannot be released until it has been resolved, per EFSP guidelines.*

Final Reports for all three Phases 37, CARES and 38 are required at the same time. The deadline to submit the Phases 37, CARES and 38 Final Reports to the National Board was January 31, 2022.

Must the Interim Report and Second Payment Request be submitted to receive the second payment for each Phase?

Yes. The Interim Report and Second Payment Request will be required to release the second payment of each Phase's funds. *If an LRO has an outstanding compliance exception in any prior Phase, including Phases 37, CARES and 38, or any jurisdiction, funds cannot be released until it has been resolved, per EFSP guidelines.*

Will files have to be kept separate for each phase?

Yes. All files for each phase must be kept separately, this includes Local Board Plans, Interim Reports & Second Payment Requests, Final Reports, documentation of expenditures, and spreadsheets for each of the Phases. This requirement has not changed; it is the same as in previous Phases of the EFSP. Do not combine files for the four phases.

Will deadlines for submission of report and forms be sent to Local Boards and LROs?

Deadlines information for all phases will be made available on the EFSP website for Local Boards and LROs. The due dates for all reports are detailed in the **Key Program Dates** document for each Phase on the EFSP website and some are included in this **Key Changes and Clarification** document. Deadlines to submit Local Board Plans are included on page one of this document. Other deadlines are as noted below:

- **Final Reports** – Final Reports for all four Phases 39, ARPAP, 40 and 41 will be made available January 2025 and will be due to the National Board on **February 15, 2025**.
- **Interim Report & Second Payment Requests** – LROs should submit their Interim Reports & Second Payment Requests to the Local Board for approval as quickly as possible so that Phases 39, APRAR, 40 and 41 funds may be released. The deadline for Local Boards to submit Interim Reports & Second Payment Requests for funded agencies to the National Board for all four phases is **November 15, 2024**.
- **Reallocations** – The deadline for Local Boards to submit Reallocation Requests to the National Board for all four phases is **November 15, 2024**.
- **Electronic Funds Transfer (EFT) Registration** – The deadline for LROs to submit EFT Registration information to the National Board to receive Phases 39, ARPAP, 40 and 41 funds is **November 15, 2024**.

IMPORTANT: Agencies should be aware of the jurisdiction's spending period end date selected by the Local Board. If the spending period end date is prior to December 31, 2024, LROs will need to ensure all Interim Reports & Second Payment Requests are submitted to the Local Board and EFT registrations are submitted to the National Board for processing so that payments are released to allow time to make expenses. Any expenses incurred outside of the jurisdiction's spending period will be considered ineligible. Local Boards will need to submit LROs approved Interim Reports & Second Payment Requests and Reallocations to the National Board timely.

All dates are subject to change and may be changed unilaterally by the National Board, as needed, including submission of Local Board Plans, Second Payment Requests, EFT enrollment, and Final Reports. Local Boards will be notified of changes via email, as necessary.

PROGRAM AND EXPENDITURES CHANGES AND REMINDERS

Program Expenditures - All EFSP guidelines must be followed when making expenditures with the funds. Duplication of service cannot occur during the spending period. Since Phases 39, ARPAP, 40 and 41 are running almost concurrently, LROs will need to ensure they do not duplicate expenditures for clients in the other shelter, rent/mortgage and utilities categories. This means clients may receive assistance up to 3 months or 90 days per phase in those categories, see the samples below:

Question 1: If a client owes rent for 2 months, can an agency pay one month of rent under Phase 39 or ARPAP and the other month under Phase 40? **Answer: Yes.** This would not be considered duplication of service because the payments were made from different phases for different months of rent.

Question 2: If a client owes rent for 2 months, can an agency pay both under Phase 40? **Answer: Yes.** Beginning with Phase 39, an agency may pay up to 3 months or 90 days rent per phase. Payment of both months of rent would be accepted under EFSP guidelines as it is not a duplication for the same client.

Question 3: If a client owes rent for 4 months, can an agency pay 4 months under Phase 41? **Answer: No.** If all months of rent were paid in the same phase, that would not be accepted as it is a duplication of service for the same client and is not allowed under EFSP guidelines.

Eligibility Changes

- **Per Meal Allowance:** Beginning with Phase 39, the per meal allowance increased to \$3 per meal for agencies using the per meal rate when providing congregate meals.
- **Per Diem Allowance:** Beginning with Phase 39, only the \$12.50 per night rate will be allowed for agencies using the per diem rate when providing mass shelter services.
- **Utilities:** Local Recipient Organizations (LROs) may pay more than one-month utility assistance. LROs may now pay up to 90 days (3 months) for clients per phase if it is necessary to prevent disconnection of services. The Local Board may approve the payments, no additional approval is required by the National Board.
- **Rent/Mortgage:** LROs may pay more than one-month rental or mortgage assistance. LROs may now pay up to 90 days (3 months) for clients per phase if it is necessary to maintain housing. The Local Board may approve the payments, no additional approval is required by the National Board.
- **Other Shelter (Hotel/Motel):** LROs may pay more than one-month hotel/motel assistance. LROs may now provide up to 90 days of assistance for clients per phase if it is necessary to prevent homelessness. The Local Board may approve the payments, no additional approval is required by the National Board.

Program Requirements Changes

- **Electronic Funds Transfer (EFT) Enrollment:** The National Board will accept Electronic Funds Transfer (EFT) enrollment information from LROs via email and fax. If preferred, LROs may still send the enrollment information to the National Board via U.S. Mail.
- **Payments:** All payments will be made to LROs via EFT. Newly funded agencies should submit bank information as quickly as possible to the National Board for processing to prevent delays in the release of funding. Variances may be considered for agencies to participate in the program that are unable to provide bank information.

Program Reminders

Personal Protective Equipment Expenditures: LROs may use funding to purchase Personal Protective Equipment (PPE). For all service providers, the purchase of PPE specifically intended to prevent or mitigate the transmission of communicable diseases is permitted. PPE must fall within the guidelines of the CDC, FDA, or state and local health requirements, as applicable to each LRO. Additional factors regarding eligibility include:

- PPE expenditures are limited to 10% of an LRO's award. If an LRO receives an award in all phases, then 10% may be used from each phase.
- PPE may be directly distributed to LRO staff and volunteers to conduct and deliver services and/or clients to receive services.
- EFSP funds cannot be used to purchase PPE for general distribution to the public or for use outside of an LRO's mission area.

Charging Back of Eligible Expenditures: LROs may submit expenditures for items and services procured prior to receiving EFSP funds. The expenditures must be incurred during the spending period and be eligible under EFSP program guidelines. All documentation requirements for the category in which the expenditures are reported will apply.

(Documentation required: Spreadsheets for the categories, documentation including invoices/receipts and proof of payment.)

No Fee Requirement For Service: No individual, family or household may be charged a fee for service or be required to attend religious/counseling services with relation to assistance received under EFSP. Please note, EFSP does not consider the receipt of donations to an agency to be the same as a fee for service. The receipt of donations does not prevent an agency from participating in the EFSP.

TRAININGS AND GUIDANCE

Will there be a Responsibilities and Requirements Manual?

Yes. The EFSP Responsibilities and Requirements Manual (EFSP Manual) will be used for the administration of all four Phases and Key Changes and Clarification document will be provided to reflect any guideline changes to be implemented.

Online Trainings - EFSP has produced several online trainings to help Local Boards and LROs administer the program in their communities, including the processing of Local Board Plans and eligible program expenditures. Local Boards and LROs may access the online trainings by logging into the EFSP website, www.efsp.unitedway.org, with their User ID and password. After logging in, select **Training Workshops** from the menu on the left side of the screen for all available trainings.



If you have any questions about the Emergency Food and Shelter Program, please contact staff at efsp@uww.unitedway.org or 703-706-9660. All documents submitted to the EFSP office must be sent via email at documentstoefsp@uww.unitedway.org.