



Emergency Food and Shelter National Board Program Phases 37 and CARES Clarification Guidance



This document is designed to offer Local Boards assistance and clarity in administering the Emergency Food and Shelter Program (EFSP) in your local communities. It should provide answers to some of the questions you may have regarding the National Board's decision to administer Phases 37 and CARES concurrently.

- Phase 37 (Fiscal Year 2019)- \$120 million
- Phase CARES (Fiscal Year 2020)- \$200 million

Why are Phases 37 and CARES being administered simultaneously?

Due to the delay in the receipt of funds for Phase 37, the EFSP National Board has decided to run Phases 37 and CARES concurrently. It is believed this will make it easier for Local Boards and LROs to administer the two phases and prevent further delays in releasing funds to communities.

How does this effect the Spending Periods for Phases 37 and CARES?

- **Phase 37-** The begin date for Phase 37 is January 1, 2020 for all jurisdictions.
- **Phase CARES-** The begin date for Phase CARES is January 27, 2020 for all jurisdictions.
- **Spending Period End Date-** **The end date for both Phases 37 and CARES will be the same date.** Spending period end date options are listed below. The latest a jurisdiction may spend funds will be May 31, 2021. The National Board will **not** grant any spending period extensions beyond May 31, 2021.

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|----------------------|---------------------|
| ▪ January 31, 2020 | ▪ October 31, 2020 |
| ▪ February 28, 2020 | ▪ November 30, 2020 |
| ▪ March 31, 2020 | ▪ December 31, 2020 |
| ▪ April 30, 2020 | ▪ January 31, 2021 |
| ▪ May 31, 2020 | ▪ February 28, 2021 |
| ▪ June 30, 2020 | ▪ March 31, 2021 |
| ▪ July 31, 2020 | ▪ April 30, 2021 |
| ▪ August 31, 2020 | ▪ May 31, 2021 |
| ▪ September 30, 2020 | |

IMPORTANT: Local Boards must select the spending period end date for the jurisdiction when the Local Board Plan is submitted. A date must be selected when Board Plans are submitted for both Phases 37 and CARES. If the Local Board does not select a date, the spending period end date will default to May 31, 2021 for the jurisdiction.

If it is necessary to extend the jurisdiction 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 Plans.

1. **Jurisdictions funded in both Phases 37 and CARES** - If your jurisdiction was funded in both Phases 37 and CARES, should you make a change at a later date by submitting a Phase 37 or Phase CARES Spending Period End Date Extension Request Form, the change will apply to both Phases.
2. **Jurisdictions funded only in Phase 37** - If your jurisdiction was funded in Phase 37, but not in Phase CARES, should you need to extend your spending period at a later date to allow Local Recipient Organizations (LROs) time to

make expenditures, all of the options to extend up through May 31, 2021 will be reflected on the Phase CARES Spending Period End Date Extension Request Form available on the EFSP website.

3. **Jurisdictions funded only in Phase CARES** - If your jurisdiction was funded in Phase CARES, but not in Phase 37, should you need to extend your spending period at a later date to allow Local Recipient Organizations (LROs) time to make expenditures, all of the options to extend up through May 31, 2021 will be reflected on the Phase CARES Spending Period End Date Extension Request Form available on the EFSP website.

When will the Phases 37 and CARES Local Board Plans be due to the National Board?

A complete Local Board Plan for both Phase 37 and Phase CARES must be submitted to the National Board by May 29, 2020. All deadlines will be made available on the EFSP website, including the due date to submit Local Board Plans for processing and subsequent release of funds.

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 for both Phase 37 and Phase CARES. If Local Boards received funds in both Phases 37 and CARES, an advertisement reflecting only one of the award amounts will not be accepted.

Will Local Boards and LROs have to submit certifications to receive Phases 37 and CARES funds?

Yes. All required certifications must be submitted for each phase per program guidelines. The certifications required are Phase specific. Phase 37 certifications will not be accepted for Phase CARES.

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.

Will Phases 35 and 36 Final Reports be required prior to the release of Phases 37 and CARES funds?

No. The National Board will release first payments to LROs for both Phases 37 and CARES, prior to receipt of Phases 35 and 36 Final Reports. This should allow release of funds to LROs more quickly, since the previous Phase's Final Report will not be required prior to the release of first payments. *If an LRO has an outstanding compliance exception in any prior Phase or any jurisdiction, funds cannot be released until it has been resolved, per EFSP guidelines.*

Final Reports for both Phases 35 and 36 will be required at the same time. The due date for Final Reports to be submitted to the National Board will be made available on the EFSP website at a later date.

Must Interim Report and Second Payment Requests be submitted to receive the second payments for Phases 37 and CARES?

Yes. The Interim Report and Second Payment Requests will still be required to release the second payments for both Phases 37 and CARES funds. *If an LRO has an outstanding compliance exception in any prior Phase 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 two phases.

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

Deadlines information for both phases will be made available on the EFSP website for Local Boards and LROs. The due date for all reports will be posted on the website. These include deadlines to submit Local Board Plans, Final Reports, Second Payment Requests, Reallocations, Electronic Funds Transfer (EFT) registration, etc.

Will there be a Phase 37 and Phase CARES Responsibilities and Requirements Manual?

No. The Phase 35 Responsibilities and Requirements Manual (EFSP Manual), Phase 36 Addendum and Phases 37 and CARES Addendum to the Phase 35 EFSP Manual will be used for the administration of both Phases 37 and CARES. Key Changes and Clarifications will be provided in the Phases 37 and CARES Addendum to reflect any guideline changes to be implemented.

QUESTIONS/CONCERNS

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 left-hand menu for all available trainings.

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 37 and CARES are running concurrently, LROs will need to ensure they do not duplicate expenditures for clients in the rent/mortgage and utilities categories. This means clients may receive assistance one time 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 37 and the other month under Phase CARES? **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 37? **Answer: No.** If both months of rent were paid in the same phase, that would not be accepted as it is a duplication for the same client and is not allowed under EFSP guidelines.



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