



# **FEMA Emergency Food and Shelter Program**

## **Alignment and Oversight Plan**

*November 21, 2018*

**Fiscal Year 2018 Report to Congress**



**Homeland  
Security**

*Federal Emergency Management Agency*

# Message from the Administrator

November 21, 2018

I am pleased to present the following report, “FEMA Emergency Food and Shelter Program Alignment and Oversight Plan,” which has been prepared by the Federal Emergency Management Agency.

The report has been compiled pursuant to the Fiscal Year 2018 Department of Homeland Security Appropriations Act (P.L. 115-141).

Pursuant to congressional requirements, this report is being provided to the following Members of Congress:

The Honorable Kevin Yoder  
Chairman, House Appropriations Subcommittee on Homeland Security

The Honorable Lucille Roybal-Allard  
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Shelley Moore Capito  
Chairman, Senate Appropriations Subcommittee on Homeland Security

The Honorable Jon Tester  
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

Inquiries relating to this report may be directed to me at (202) 212-3900.

Sincerely,



Brock Long  
Federal Emergency Management Agency





# FEMA Emergency Food and Shelter Program Alignment and Oversight Plan

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# I. Legislative Requirement

This document has been compiled in response to the Joint Explanatory Statement accompanying the Fiscal Year (FY) 2018 Department of Homeland Security (DHS) Appropriations Act (P.L. 115-141). Specifically, Division F, Title III of the Joint Explanatory Statement states:

*Emergency Food and Shelter Program.* The total includes \$120,000,000 for the Emergency Food and Shelter Program (EFSP). Not later than 120 days after the date of enactment of this Act, FEMA shall submit to the Committees a plan to ensure EFSP aligns with overarching federal strategies to meet the needs of hungry and homeless people. In order to provide the Committees and the public with the data necessary to ensure financial responsibility, the plan shall outline the oversight procedures and metrics used to ensure effective implementation.

## II. Background

### A. Overview

Congress enacted the Stewart B. McKinney Homeless Assistance Act (P.L. 100-77) on July 22, 1987, in recognition that:

- The Nation faces a homeless crisis due to the lack of shelter;
- The causes of homelessness are many and complex, and homeless individuals have diverse needs;
- There is no single or simple solution to the different causes of and reasons for homelessness, and the different needs of homeless individuals;
- States, units of local government, and private voluntary organizations have been unable to meet the basic human needs of all homeless individuals, and in the absence of greater federal assistance, will be unable to protect the lives and safety of all homeless individuals in need of assistance; and
- The Federal Government has a clear responsibility and capacity to fulfill a more effective and responsible role to meet the basic human needs of homeless individuals.

The Act, renamed the McKinney-Vento Homeless Assistance Act in 2000, and its subsequent amendments,<sup>1</sup> generated a framework for a comprehensive and coordinated approach to addressing homelessness,<sup>2</sup> including the establishment of the Federal Emergency Management Agency's (FEMA) Emergency Food and Shelter Program (EFSP). Central to this effort, the Act established the United States Interagency Council on Homelessness (USICH) to coordinate the federal response to homelessness and to create "a national partnership at every level of government and with the private sector to reduce and end homelessness in the nation while maximizing the effectiveness of the Federal Government in contributing to the end of homelessness."<sup>3</sup> In coordinating and catalyzing the federal response to homelessness, USICH works in close relationship with senior leaders across 19 federal member agencies. The USICH Council initially included FEMA and began including DHS in place of FEMA in 2004, after the creation of DHS in 2002. Today, FEMA serves as the USICH Council member on behalf of DHS.

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<sup>1</sup> The Act has been amended and reauthorized on a number of occasions, including under P.L. 100-628 on November 7, 1988, under P.L. 106-400 on October 30, 2000 (when the Act was renamed the McKinney-Vento Homeless Assistance Act), and under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) (P.L. 111-22, Division B) on May 20, 2009.

<sup>2</sup> Notably, the HEARTH Act codified the Continuum of Care governance structure, consolidated the Department of Housing and Urban Development (HUD) competitive homeless grant programs, increased the level of collaboration and coordination required between grant recipients and other mainstream providers, increased the emphasis on the performance of providers in best serving people experiencing homelessness, and changed HUD's definitions of homeless and chronically homeless.

<sup>3</sup> The McKinney-Vento Homeless Assistance Act (P.L. 100-77, July 22, 1987, 101 Stat. 482, 42 U.S.C. § 11301 et seq.

While achievements have been made to end homelessness in America, USICH and its member agencies assess that there is much more work to do, including directing more attention and resources on preventing people from falling into homelessness in the first place.<sup>4</sup> This area of increased focus aligns closely with the structures, policies, and procedures of EFSP, which is dedicated to assisting those who are experiencing homelessness and those who are on the verge of becoming homeless. Given the importance of the work of EFSP toward meeting the objectives and realizing the strategies of USICH, this plan examines EFSP's alignment with overarching federal strategies to meet the needs of hungry and homeless people and those who are at immediate risk of hunger and homelessness. This plan also reviews the program's oversight procedures and processes put in place by the National Board, as mandated by statute or by federal grant regulations and requirements that ensure EFSP's effective implementation.<sup>5</sup>

## B. Program Description

EFSP was established on March 24, 1983, as part of the Emergency Jobs Appropriation Act (P.L. 98-8), in response to the high unemployment during the Recession of 1982-83, and was subsequently incorporated into the McKinney-Vento Homeless Assistance Act. Under the Emergency Jobs Appropriation Act, Congress appropriated \$50 million to FEMA to provide emergency food and shelter to individuals in need.<sup>6</sup> Congress's spending bill was in reaction to an outcry across the country from emergency service providers in both private charitable and local government sectors who were overwhelmed by the demand for services to hungry and homeless individuals.<sup>7</sup> Federal assistance targeted to homeless individuals and families was largely nonexistent prior to the mid-1980s, and the first federal program focused on assisting homeless people was EFSP.<sup>8</sup>

EFSP funds are appropriated to FEMA, but the McKinney-Vento Homeless Assistance Act established a National Board to govern the program, including the distribution of funds to local jurisdictions (counties or cities). The National Board is chaired by FEMA and consists of representatives of the American Red Cross, Catholic Charities USA, The Jewish Federations of North America, National Council of the Churches of Christ in the USA, The Salvation Army, and United Way Worldwide (UWW). The program is administered at the community level by Local Boards whose membership mirrors the National Board, with a local government representative in place of FEMA. Local Boards also include a homeless or formerly homeless representative, a Native American representative,<sup>9</sup> where applicable, as well as representatives from other agencies active in assisting homeless and hungry persons in the community. Local

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<sup>4</sup> A key objective of *Home, Together: The Federal Strategic Plan to Prevent and End Homelessness* is to, "[t]arget assistance to prevent crises that do occur from escalating further and resulting in homelessness."

<sup>5</sup> The Administration has proposed elimination of the EFSP in the 2018 and 2019 President's Budgets; if Congress continues to appropriate funds, FEMA will continue to ensure coordination with other federal agency strategies to end homelessness.

<sup>6</sup> Congressional Research Service, *The Emergency Food and Shelter Program*, September 29, 2005 (RS22286).

<sup>7</sup> U.S. Government Accountability Office (GAO) Report, *Homelessness: Coordination and Evaluation of Programs Are Essential*, February 1999 (GAO/RCED-99-49).

<sup>8</sup> Congressional Research Service, *Homelessness: Targeted Federal Programs and Recent Legislation*, May 6, 2015 (RL30442).

<sup>9</sup> For jurisdictions located within or encompassing a federally recognized Native American reservation, or where a Native American population resides in the jurisdiction.

Boards determine which nonprofit and governmental agencies, referred to as Local Recipient Organizations (LRO), within their jurisdictions, are to be awarded funds, and the National Board then disburses the funds directly to those agencies (see “Roles and Responsibilities: Details”). Consistent with the congressional findings and purpose of the McKinney-Vento Homeless Assistance Act, the National Board encourages Local Boards to provide funds for programs to assist people experiencing homelessness, with special emphasis on older adults, persons with disabilities, families with children, Native Americans, and veterans.<sup>10</sup>

EFSP was established to supplement and expand the ongoing work of local social service organizations, both nonprofit and governmental, to provide emergency food, shelter, and supportive services to individuals and families in economic crisis (particularly emphasizing assistance to the most vulnerable populations), and to prevent individuals from becoming homeless. EFSP funding is open to thousands of local organizations providing homelessness prevention assistance, with priority of serving localities with the highest need for emergency food and shelter assistance. In accordance with the McKinney-Vento Homeless Assistance Act, the National Board establishes its own procedures and policies for administering the program, which emphasizes fast response, local decision-making, and rigorous accountability standards of program transactions.<sup>11</sup> The National Board determines the funding allocations to local communities across the country as well as the eligible uses of the funds.

To meet the requirements of the McKinney-Vento Homeless Assistance Act legislation, the National Board has determined that the eligible services LROs may provide to clients using EFSP funds include:

- Food, in the form of served meals or groceries;
- Lodging in a mass shelter or hotel;
- One month’s rental or mortgage assistance to prevent evictions;
- One month’s utility payments to prevent service cutoffs;
- Transportation costs associated with the provision of food or shelter;<sup>12</sup>
- Minimal repairs to mass feeding or sheltering facilities for building code violations or accessibility for persons with disabilities; and
- Supplies and equipment necessary to feed or shelter people, up to a \$300 limit per item.

To address the needs of jurisdictions that do not receive funding from the National Board’s allocation formula, the program also includes the State Set-Aside (SSA) Committee process (see “Roles and Responsibilities: Details”). This process allows for an allocation to each state on the basis of the unemployment level in the jurisdictions that did not qualify for direct funding under the allocation formula. Federal funds are awarded annually in full to the National Board, and under the McKinney-Vento Homeless Assistance Act may be used to:

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<sup>10</sup> 42 U.S.C. § 11301 (a) and (b). Special emphasis on these particular at-risk populations is consistent with population-specific goals set forth in *Home, Together* to end homelessness among veterans, people with disabilities, families with children, and other subpopulations such as older adults.

<sup>11</sup> Congressional Research Service, *The Emergency Food and Shelter National Board Program and Homeless Assistance*, April 10, 2013 (R42766).

<sup>12</sup> The permissibility of transportation costs is consistent with the objective of *Home Together*, which includes transportation services as a strategy to “Increase community capacity and state-level coordination to effectively identify, target, and connect at-risk individuals and families to local resources and opportunities that contribute to and strengthen housing stability.”

- Supplement and expand ongoing efforts to provide shelter, food, and supportive services for homeless individuals with sensitivity to the transition from temporary shelter to permanent homes;
- Supplement and expand attention to the access and functional needs of individuals experiencing homelessness with mental and physical disabilities and illnesses;
- Facilitate access for homeless individuals to other sources of services and benefits;
- Strengthen efforts to create more effective and innovative local programs by providing funding for them; and
- Conduct minimum rehabilitation of existing mass shelter or mass feeding facilities, but only to the extent necessary to make facilities safe and sanitary to bring them into compliance with local building codes.<sup>13</sup>

### C. Summary of FEMA and National Board Roles, Responsibilities, and Accomplishments

Title III of the McKinney-Vento Homeless Assistance Act provides that the National Board carries out the EFSP and that the FEMA Administrator serves as the National Board Chair. The National Board Chair is responsible for appointing members from among the individuals nominated by the national nonprofit organizations named in the statute. FEMA is charged to provide administrative support and act as federal liaison to the National Board. FEMA's Program, Congressional Affairs, and Public Affairs offices work closely with the National Board's Secretariat and Fiscal Agent, UWW, to develop supporting materials, which inform Congress of the annual award to the National Board and provide details of the National Board's allocation formula, and the specific allocation of funds to qualifying counties and cities throughout the country.

Additionally, FEMA makes the services of its legal counsel and Inspector General available to the National Board. FEMA awards the annual grant to the National Board in the full amount that is appropriated, and monitors EFSP both programmatically and fiscally in accordance with federal grant regulations and requirements. Monitoring includes assessment of Improper Payments Elimination and Recovery Act (IPERA) compliance, an annual independent audit, and audits at other times as may be requested. IPERA assessments are conducted to identify and prevent improper payments of federal funds. FEMA also responds to congressional and public inquiries on behalf of the program, and serves as liaison to Congress, the public, and other stakeholders at the federal, state, and local levels.

The National Board is authorized under the McKinney-Vento Homeless Assistance Act to govern the program and to deliver its funding to those most in need through local nonprofit and governmental organizations. EFSP is unique in that the National Board is charged to establish its

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<sup>13</sup> Many of these permitted uses are consistent with the goals of *Home, Together* to strengthen our communities through "Quality educational and career opportunities, child care, health care, substance abuse and mental health services, and aging services [to] help individuals and families build strong social networks, pursue economic mobility, and strengthen their overall well-being," and to "Provide a safe, decent, welcoming, and appropriate temporary living environment, where daily needs can be met while pathways back to safe living arrangements or directly into housing programs are being pursued."



own procedures and policies and is exempt from the procedural rulemaking requirements of subchapter II of chapter 5 of title 5, United States Code.<sup>14</sup> However, the National Board, just as any recipient of federal grant funds, must adhere to all federal grant regulations and requirements. The National Board members, including the FEMA Chair, work closely together to carry out the mission of the program effectively. Collaboration under the program, both at the national level and among the nonprofit and governmental organizations at the local level, has been heralded as a model of public-private partnership.<sup>15</sup> Some federal programs have emulated EFSP's local board approach for decision-making on the use of federal resources for people experiencing homelessness.

The National Board is charged by statute to establish written guidelines to include:

- Methods for identifying localities with the highest need for emergency food and shelter assistance;
- Methods for determining the amount and distribution to such localities;
- Eligible program costs, including maximum flexibility in meeting existing needs; and
- Guidelines specifying the responsibilities and reporting requirements of the National Board, its recipients, and service providers.

To ensure that the Local Boards and LROs understand and follow the guidelines, EFSP employs a number of practices to reduce compliance errors and increase program efficiencies. These are described in detail in Section IV. E. below.

The National Board meets at least monthly in person to establish or improve procedures, policies, and deliverables; foster public-private partnerships; hear and adjudicate requests and issues from the local level; and increase program and subrecipient accountability while meeting its charge to disburse funds rapidly to areas of highest need. Significant administrative and oversight accomplishments include:

- **Nationwide Reach:** Distributes funding annually that reaches more than 2,500 local communities and approximately 10,000 local service organizations (both charitable and governmental). Since 1983, an estimated 2.8 billion meals and 287.5 million nights of lodging have been provided, and an estimated 5.3 million rent/mortgage and 7.1 million utility payments have been made.
- **Responsible Administration:** Issued clean, annual independent audits (A-133 audits) since the program's inception.
- **Low Risk for Improper Payments:** IPERA assessments conducted in 2013 and 2014 determined improper payments below the 1.5 percent error rate and \$10 million value thresholds established by the Office of Management and Budget (OMB). Consequently, OMB granted a waiver to an IPERA assessment in 2015 for EFSP, and FEMA's Office of the Chief Financial Officer (OCFO) has advised EFSP that participation in each subsequent year would be determined based on the risk assessment conducted on the program. EFSP has been assessed to be low risk for improper payments in the intervening years. A risk assessment was completed in September 2018 and EFSP continues to remain low risk.

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<sup>14</sup> 42 U.S.C. § 11346 (b).

<sup>15</sup> GAO Report, February 1990 (GAO/RCED-90-62: Status of McKinney Act Funds).

- Responsiveness to Needs: Hears requests from Local Boards and LROs and reallocates program funding to jurisdictions with demonstrated additional or increased emergency food and shelter needs. Reallocation funds come from dollars that have been returned from awarded jurisdictions because of compliance issues or nonuse.
- Local Engagement: Conducts annual town halls and onsite visits to meet with Local Boards and provider groups to understand the program's impact, concerns, or unmet needs, and to learn how to simplify and improve its processes and deliverables.
- Guidance: Publishes annually an operational manual that addresses the responsibilities and requirements, as well as newly established or revised policies and procedures, under the program.
- Accountability: Ensures accountable program and expenditure reporting, and adherence to all grant requirements, at all levels.
- Low Administrative Overhead: Carries out all of the work of EFSP at the national level by only using 1 percent of the program's 3.5 percent administrative budget allowed through appropriations law. The remaining 2.5 percent is passed on to Local Boards, SSA Committees, and LROs either for use toward administrative costs or for providing additional services, as determined at the local level.

### III. EFSP Alignment with Overarching Federal Strategies

#### A. Alignment Overview

Both USICH and EFSP are authorized by the McKinney-Vento Homeless Assistance Act. In enacting this legislation, Congress found that “there is no single, simple solution to the problem of homelessness” because of the complex makeup and needs of homeless individuals. Congress also recognized that “States, units of local government, and private voluntary organizations are unable to meet the basic human needs of all of the homeless,” and that the “Federal Government has a clear responsibility ... to fulfill a more effective and responsible role to meet the basic human needs and to engender respect for the human dignity of the homeless.”

Under the Act, USICH was established as a new, independent federal agency to coordinate the Federal response to homelessness and to create a national partnership at every level of government and with the private sector to reduce and end homelessness in the Nation while maximizing the effectiveness of the Federal Government in contributing to the end of homelessness. Its mission includes implementing and keeping current a federal strategic plan to prevent and end homelessness. Furthermore, as part of its functions, USICH submits an annual report to Congress that describes for each member agency of the Council the number of homeless individuals served, any statutory or regulatory impediments that restrict homeless individuals from obtaining services or benefits, and the efforts made to increase the opportunities for homeless individuals to obtain shelter, food, and supportive services.

Under the Act, EFSP was established as a new program of FEMA to supplement and expand the ongoing work of local social service organizations, both nonprofit and governmental, to provide low-barrier shelter, food, and supportive services to individuals and families who have economic emergencies. EFSP funding is open to all organizations helping hungry and homeless peoples, as well as organizations that support those at risk of becoming hungry and homeless due to economic hardships.

On July 19, 2018, USICH released *Home, Together*,<sup>16</sup> its revised federal strategic plan. A key objective to the revised Plan is to ensure that homelessness is a brief experience. Toward reaching this objective, the Plan recognizes that, “Emergency shelter, other temporary accommodations, and other crisis services are the critical front line of communities’ responses to homelessness, helping people meet basic survival needs for shelter, food, clothing, and personal hygiene, while also helping them resolve crises and swiftly secure permanent housing opportunities.” Given the role that EFSP plays in supporting community programs that provide emergency shelter, food and supportive services, EFSP has begun working with USICH on the planning, development, and implementation of a number of activities that support the objectives of the Plan.

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<sup>16</sup> Found at <https://www.usich.gov/home-together>.

## B. Alignment with *Home, Together: The Federal Strategic Plan to Prevent and End Homelessness*

*Home, Together* seeks to serve as a road map for nonfederal agencies and partners to identify and implement their own strategic activities and to align their efforts with federal agencies and other partners. Toward this end, FEMA and the National Board have begun working closely with USICH to identify activities to align Local Boards and LROs with the *Home, Together* objectives and strategies to strengthen program and agency partnerships, service coordination, and data collection, as follows:

- Identifying opportunities to strengthen participation in local continuums of care and coordinated entry processes;
- Supporting increased capacity of communities to ensure that identification, outreach, and engagement efforts are comprehensive and coordinated across sectors and agencies;
- Strengthening capacity in rural and suburban areas to maximize outreach efforts;
- Targeting assistance to prevent housing crises from escalating further and resulting in homelessness;
- Providing access to low-barrier emergency shelter;
- Supporting rural and suburban areas to implement effective, regionally specific coordinated entry processes;
- Connecting people to rapid rehousing;
- Connecting people with the most intense needs to permanent supportive housing;
- Linking people experiencing unsheltered homelessness to housing and services solutions;
- Strengthening effective implementation of the core components of rapid rehousing;
- Supporting communities to implement continuous quality improvements to housing and services interventions; and
- Participating in data-sharing for rental assistance and shelter programs through the Homeless Management Information Systems (HMIS).

## C. Ongoing Cooperation with USICH

Realizing that the implementation of the above-identified strategic activities will take planning development and continued cooperation, FEMA, the National Board, and USICH have outlined the following areas of planned coordination and undertakings in support of aligning EFSP with federal strategies and initiatives:

**Engagement:** FEMA's engagement with USICH in support of *Home, Together* is imperative in the alignment of EFSP with hunger and homelessness efforts. On behalf of DHS, FEMA serves on the USICH Council and participates on the federal work group to end rural homelessness. The National Board is represented on the nonfederal advisory work group to end rural homelessness that is chaired by HUD. EFSP funding is provided to approximately 2,500 jurisdictions, to each of the territories, and to approximately 10,000 local agencies throughout the country for each spending cycle. Many of the jurisdictions are in rural communities and EFSP is often the only funding available to help address their particular food and shelter needs. FEMA and the National Board are interested in learning more about the needs of rural communities and how organizations and programs can more effectively work together to support those needs.

Additionally, FEMA will discuss participation with USICH on other workgroups that may be organized to align EFSP better with federal strategies and to enhance services to those in need.

**Education:** USICH will work closely with FEMA and the National Board to identify ways to provide education about EFSP to other federal programs and recipients. Central to this instruction will be how EFSP contributes to the federal strategic plan. EFSP funding is used to fill gaps where there are needs in a community. Assistance with rent/mortgage payments, or utility payments, is sometimes the one-time help that a client needs to prevent homelessness and continue in his or her home.<sup>17</sup> EFSP funds also afford flexibility by allowing service providers to assist clients with additional needs in order to help stabilize their overall living situation.<sup>18</sup> FEMA, the National Board, and USICH will make plans to share information about the program, including:

- Providing information on USICH's Web site about the purpose of EFSP and how it is structured, the nature of its emergency funding, and how it may be used in communities throughout the country and the territories;
- Hosting a Web conference produced by USICH for Local Boards and LROs, which explains EFSP's alignment and coordination with the federal strategic plan and other federal initiatives so that EFSP local providers may understand and enhance their roles to ensure alignment; and
- Devoting time during the National Board's monthly meeting to discuss issues pertaining to USICH alignment and providing USICH with an opportunity to present or meet with the National Board to discuss matters of mutual interest.

**Site Visits:** The National Board conducts two site visits each year to different locations around the country. Since 1994, the National Board has traveled to 29 locations to hear from local communities regarding the benefits of the program, barriers that clients may face when attempting to access services, and any unmet needs in addressing hunger and homelessness issues. The most recent visits were in April 2018 to Memphis, Tennessee, and Crittenden County, Arkansas, and in September 2018 to the San Francisco Bay Area. FEMA, the National Board, and USICH have discussed plans for USICH regional staff to join the National Board at upcoming local site visits to collaborate in the field on issues facing communities and people living in the region, the challenges, concerns, progress, and advances experienced by organizations providing emergency food and shelter services, and further ideas concerning

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<sup>17</sup> It is common for nonprofit and government agencies to provide financial assistance to prevent homelessness. The University of Notre Dame's Wilson Sheehan Lab for Economic Opportunities conducted a study on the direct impact of financial assistance on homelessness. The study, published in August 2016, found that emergency financial aid significantly reduces homelessness, and the results indicate that policymakers should consider emergency financial assistance as an effective, evidence-based approach for preventing homelessness.

Sources: University of Notre Dame, Wilson Sheehan Lab for Economic Opportunities, "Emergency Assistance Prevents Homelessness," August 2016; Link:

[https://leo.nd.edu/assets/206997/hppc\\_policy\\_brief\\_august\\_2016\\_final.pdf](https://leo.nd.edu/assets/206997/hppc_policy_brief_august_2016_final.pdf). Science, "A bit of cash can keep someone off the streets for 2 years or more," August 11, 2016; Link: <http://www.sciencemag.org/news/2016/08/bit-cash-can-keep-someone-streets-2-years-or-more>.

<sup>18</sup> Under the McKinney-Vento Homeless Assistance Act, the program's guidelines provide maximum flexibility within the program's eligible activities in meeting current existing needs. This flexibility is consistent with USICH's objective for frontline providers to help people meet basic survival needs, such as shelter, food, clothing, and personal hygiene, while also helping them to resolve crises and to secure permanent housing opportunities swiftly.

EFSP's alignment with the work of USICH. The National Board has expressed interest in including opportunities for enhancing and expanding alignment with *Home, Together* and other USICH developing initiatives in presentations to visited communities.

**Data Use:** As set forth in the McKinney-Vento Homeless Assistance Act, EFSP reports annually to Congress, through USICH, on the activities conducted in each spending cycle, such as the number of and total amount spent on meals provided, rent/mortgage payments made, utility payments made, and nights of lodging provided. In support of this reporting, LROs are required to keep and make available to the National Board records on their expenditures and, under program guidelines, to report to the National Board on these expenditures. This practice is the extent of data collection required of the program under the Act.

Defining success and measuring progress of the EFSP is complicated because of its supplemental nature, local decision-making and the diversity of the recipient organizations, whose programs are varied in scope, size, and community. Consistent with the McKinney-Vento Homeless Assistance Act, FEMA and the National Board have focused on strong oversight and program administration, and in closely tracking how program dollars are spent. The strong stewardship over the program has been consistently recognized in annual audits and other reviews as described in further detail in Section IV. D. below.

In aligning with the federal Strategies outlined in *Home, Together*, FEMA and the National Board have begun working with USICH to determine how EFSP can contribute to key measures of progress. Towards this end, EFSP and USICH are exploring opportunities for EFSP grantees to participate in HMIS, which are the local information technology systems used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Participation in HMIS would allow EFSP grantees that provide rental assistance and shelter programs to monitor their program metrics, including: the number of individuals and families served, the type of assistance provided, the extent to which people who exit homelessness to permanent housing destinations return to homelessness, and successful placement in or retention of permanent housing. It also would facilitate referrals between the continuums of care and EFSP grantees. Recognizing both the importance of and barriers to measuring the impacts of federal homelessness assistance programs, FEMA and the National Board are committed to exploring with USICH and its member agencies possible strategies and best practices for EFSP to track and report essential data and to inform projections, through HMIS and other systems that may be considered.<sup>19</sup>

**Collaboration and Coordination:** Consistent with the McKinney-Vento Homeless Assistance Act, EFSP Local Boards are encouraged to network with other groups and stakeholders in the

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<sup>19</sup> Data collection recommendations need to take into account the statutory limitations on the use of EFSP funds for administration costs, which have been reported to be a barrier to seeking and evaluating additional data from Local Boards. According to Congressional Research Service Report, *The Emergency Food and Shelter National Board Program and Homeless Assistance*, October 5, 2012 (R42766), increasing funds for administration could also provide the National Board with the resources necessary to seek and evaluate additional data from Local Boards. While the McKinney-Vento Homeless Assistance Act authorizes that up to 5 percent of the total amount appropriated for the EFSP for each fiscal year may be expended for the costs of administration, Congress limits total administrative costs to 3.5 percent of the program's annual appropriation.

community who provide emergency food and shelter services in order to leverage resources to prevent duplication of services, allow more services to be offered, and allow more clients to be served. FEMA and the National Board will continue to explore with USICH ways that Local Boards and LROs can collaborate with other groups in their communities, and opportunities to promote better communitywide planning and strategic use of resources.

## IV. EFSP Implementation

### A. Roles and Responsibilities: Summary

Under the McKinney-Vento Homeless Assistance Act, EFSP's National Board includes representatives from six national nonprofit organizations, is chaired by a representative of FEMA, and establishes its own procedures and policies in governing EFSP. Through the chairperson, FEMA provides the National Board with administrative support and serves as the federal liaison to the National Board.

Through an annual appropriation, the National Board makes grants to supplement and expand ongoing efforts to provide emergency shelter, food, and supportive services through a collaborative effort encompassing approximately 10,000 local private nonprofit and public human service agencies located in more than 2,500 counties and cities across the country.<sup>20</sup> The program targets communities with the highest need for emergency food and shelter assistance, and prioritizes the use of resources to meet the specialized needs of homeless individuals with mental and physical disabilities and illness, and other vulnerable populations, such as older adults, families with children, Native Americans, and veterans.

Under the McKinney-Vento Homeless Assistance Act, the National Board constitutes in each designated locality a Local Board to determine how program funds allotted locally through the National Board's funding formula are to be distributed to eligible private and public recipient organizations referred to as LROs. Additionally, to maximize the reach of the program to areas in need, the National Board established a backstop system of SSA Committees. These SSA Committees serve as decision-making bodies at the state level that work with the National Board to ensure that every state has the flexibility also to consider funding unqualified jurisdictions under the National Board's funding formula that have pockets of homelessness or poverty and that demonstrate a need that can be served by the program.

Under the McKinney-Vento Homeless Assistance Act, no more than 5 percent of the total amount appropriated for EFSP may be expended for the costs of administration. However, in the annual appropriations, Congress elected to restrict further allowable administrative costs to not more than 3.5 percent of the total appropriated amount. In accordance with these limitations, the National Board has determined that an administrative allowance of 1 percent of the total appropriation or award may be used for National Board administration; the SSA Committee may use an administrative allowance of 0.5 percent of the total SSA award for its administrative costs; and the Local Board may use up to 2 percent of the total Local Board allowance for its administrative costs, or pass all or a portion of this allowance to LROs applying for administrative funds, who may use up to 2 percent of the LRO's award toward administrative costs.

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<sup>20</sup> In February 1999, the GAO published a report on homelessness programs (GAO/RCED-99-49), which found, "In most areas of the United States, this program is the only source of funding for the prevention of homelessness." When localities have depleted these funds, they have no other source of emergency assistance for rent, mortgage or utility bills." Link: <https://www.gao.gov/assets/230/226919.pdf>.



## B. Roles and Responsibilities: Details

**FEMA:** FEMA chairs the National Board, with representatives from six national nonprofit organization, using parliamentary procedures and consensus as the mode of operation. FEMA provides policy guidance, monitoring and oversight, federal coordination, and staff assistance to the National Board. FEMA awards the grant to the National Board and assists UWW in implementing EFSP. FEMA reports to Congress on the year's program activities through the USICH Annual Report. Through the DHS Office of Inspector General (OIG) and FEMA OCFO, FEMA monitors the National Board's annual audit of the program. Overall administration and management of the grant expenditures are monitored by FEMA, which receives reports from the Secretariat and Fiscal Agent that provide detailed accounting of all program monies.

**National Board:** The National Board is the governing body of EFSP with responsibility for selecting jurisdictions to receive funds. Funding is appropriated annually by Congress. Each annual appropriation is associated with a corresponding program phase. Since the program's inception, there have been 36 program phases (through FY 2018), and a one-time appropriation under the American Recovery and Reinvestment Act of 2009. Jurisdictions are selected to receive funds using a formula based upon unemployment statistics from the U.S. Department of Labor, Bureau of Labor Statistics, and poverty statistics from the U.S. Bureau of the Census. Poverty and unemployment were selected as the best indicators of need available nationwide at the city or county level. The National Board adopted these combined criteria (i.e., unemployment and poverty) to target funds for high-need areas more effectively and to allocate funds rapidly and fairly. Criteria for expenditure of funds and the distribution of funds to selected LROs are developed by the National Board.

To ensure adherence and compliance with the program's policies and procedures, the National Board has developed the EFSP Responsibilities and Requirements Manual, which provides comprehensive guidance to the Local Boards, LROs, and SSA Committees. Updated annually, the most recent manual may be accessed at:  
[https://www.efsp.unitedway.org/efsp/website/websiteContents/PDFs/EFSPManual/Phase\\_35\\_Manual.pdf](https://www.efsp.unitedway.org/efsp/website/websiteContents/PDFs/EFSPManual/Phase_35_Manual.pdf).

The National Board ensures accountability of funds at all levels, and that misused and unused funds are returned for reallocation in other communities with high needs. As requested or needed, the National Board compiles reports from data received from Local Boards pertaining to the units and categories of services provided. Categories of services provided include: served meals and other food provided, mass shelter, rent/mortgage assistance, utilities payments made, agency building rehabilitation, supplies (e.g., hygiene items such as feminine hygiene products and diapers), administrative activities, and unexpended/returned funds. Detailed accounting for all program monies, in the form of a report, is provided to FEMA. The National Board conducts compliance reviews of food and shelter expenditures made under this program for specified LROs. An annual audit is performed to ensure that the funds are accounted for and program guidelines are followed. This includes monitoring of LROs to ensure their compliance with Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200).

EFSP is a need-based program, for which clients must qualify. The National Board does not set client eligibility criteria. Local Boards may choose to set such criteria or use existing criteria. However, any criteria used must provide for assistance to needy individuals without discrimination based on age, race, sex, religion, national origin, disability, or sexual orientation. Additionally, in accordance with the McKinney-Vento Homeless Assistance Act, criteria must include “sensitivity to the transition from temporary shelter to permanent homes and attention to the specialized needs of homeless individuals with mental and physical disabilities and illness and to facilitate access for homeless individuals to other sources of services and benefits.” Further, in accordance with the legislation, the criteria must place special emphasis on identification of and assistance to older adults, families with children, Native Americans, and veterans. USICH, FEMA, and the National Board understand that serving these vulnerable populations is a priority within *Home, Together*.

**Secretariat and Fiscal Agent:** The National Board has selected UWW as the Secretariat and Fiscal Agent to perform the necessary daily administrative duties and functions of the Board. Through staff dedicated solely to the administration and operation of EFSP, the duties of the Secretariat and Fiscal Agent include carrying out the awards notification and payment processes; ensuring compliance through the issuance of guidance, training, and technical assistance and the conduct of oversight and audits; facilitating National Board meetings, planning, and site visits; and overseeing the database and interactive program Web site. An administrative allowance of 1 percent of the total award to the program each fiscal year has been determined by the National Board for its administration.

**Local Boards:** Each jurisdiction designated by the National Board to receive funds must constitute a Local Board, the local governing body. Local representatives of the National Board member agencies must be invited to serve on the Local Board. The highest ranking county government official or his/her designee replaces the FEMA member on the Local Board. As required by the McKinney-Vento Homeless Assistance Act, Local Boards also must include a homeless person, formerly homeless person, or homeless advocate to serve. The requirement to have a homeless representative on the Local Board reflects USICH’s priority to ensure that planning, communications, and policy conversations are informed by people with lived experience.

Funds allocated to a jurisdiction can be used only for permanent and temporary residents within that jurisdiction. Local Boards must advertise the availability of funds to their jurisdictions each fiscal year that they receive a funding allocation. Local Boards must set funding priorities annually, prior to the selection of agencies for funding. They must look at the resources available in the community, the emergency food and shelter needs of the community, and gaps in services in the community, and focus the dollars to address these needs in the areas of emergency food and shelter.

Local Board membership must have no relationship to funding and is not a guarantee of funding. As a precaution against conflicts of interest, Local Board members must abstain from voting on award applications for their own agency. Local Boards cannot select agencies for funding where the agency has received an adverse or no opinion audit in its independent audit. Local Boards

may decide to reallocate funds within their jurisdiction during the program spending period. This flexibility allows for responsiveness to changing or immediate needs that might arise.

The National Board requires Local Boards to meet at least semiannually during the spending period to monitor the program and to ensure that LROs are implementing the program according to guidelines and that deadlines are met. Local Boards may choose to meet more frequently. Local Boards must review required reports and documentation for completeness and compliance with program guidelines, including the agency's annual audit/review, if required. Local Boards must submit required reports to the National Board, including the Local Board Plan (spending plan), the jurisdiction's Final Report with supporting documentation of expenditures made with the funds, and Interim Reports and Second Payment Requests. These reports track funds spent, unspent or reallocated, assist in any review and audit processes, ensure that Local Boards are reviewing LRO reporting and documentation requirements properly, and help to track the categories and units of services provided.

The Local Board determines the use of the administrative allowance for the jurisdiction; they may elect to use all or any portion of the 2 percent allowance for their own administrative costs. Local Boards may award all or part of the administrative allowance to LROs applying for administrative funds. LROs may receive no more than 2 percent of their own award for administration costs. Any of the administrative allowance not spent must be put back into program funds for additional services.

**LROs:** LROs are private nonprofit and local public human service agencies selected to receive funds. LROs must maintain records according to EFSP guidelines. They are required to consult with their Local Board chair/staff on matters requiring interpretation or clarification prior to incurring an expense or entering into a contract. LROs must provide services within the intent of the program. Funds are to be used on an ongoing basis to supplement and expand food and shelter services, and are not to substitute for other program funds or to start new programs. Funds are not to be held or reserved for future use but spent on an as-needed basis to supplement and expand existing services. All funds awarded to an LRO must provide for services within the jurisdiction's spending period. LROs must pay for all eligible program expenses by an approved method of payment.

LROs must submit reports to the Local Board by their due dates, including Interim Reports, Second Payment Requests, and Final Reports. Complete, accurate, legible documentation must be submitted and must support the expenditures claimed on the Final Report. LROs must work with the Local Board to resolve quickly any concerns related to compliance exceptions. Compliance exceptions occur when there are concerns raised by the National Board (in reviewing Final Reports) that expenditures have been made by an LRO outside of the program's guidelines. These exceptions may be satisfied through the provision of further clarification or documentation, or they may require corrective actions, including the return of funds. Failure of an LRO to comply with the National Board's reporting requirements will result in future funds being withheld. The National Board holds funds until all reporting requirements have been satisfied. If an LRO does not comply in a timely manner to compliance issues, the Local Board or National Board may reclaim and reallocate the funds being withheld. LROs are required to

keep their documentation records for 3 years after each end of a program year and, if there are unresolved compliance exceptions, the documentation must be kept until the issue is resolved.

LROs must comply with lobbying requirements. Lobbying is not permitted with EFSP funds. Any LRO receiving \$100,000 or more in EFSP funds is required to submit a Lobbying Certification stating that EFSP funds will not be used for lobbying activities and disclosure of lobbying activities (if applicable). LROs must comply with audit requirements. The National Board requires an independent annual audit in accordance with Government Auditing Standards for LROs receiving \$100,000 or more in EFSP funding. LROs receiving \$50,000 to \$99,999 are required by the National Board to conduct an annual accountant's review. Any agency expending \$750,000 or more in federal funds must comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200).

**SSA Committees:** The SSA Committee process under EFSP allows greater flexibility in selection of jurisdictions to target pockets of homelessness or poverty. On average, the National Board allocates 8 percent of the total award to the program for SSA activities and distributes funds among the states according to a calculation informed by state unemployment figures. In awarding funds, SSA Committees consider jurisdictions with documented measures of need that are not reflected sufficiently in the unemployment or poverty data to qualify for funding as determined through the National Board's funding formula for the program phase or fiscal year. The SSA Committees also may consider areas experiencing drastic economic changes such as plant closings, areas with high levels of unemployment or poverty that did not meet the minimum level of unemployment to qualify under the National Board's formula for the program phase or fiscal year, or other special circumstances that present need for EFSP funding, such as long-term economic impacts of natural disasters.

The SSA Committees have the flexibility to act independently in developing their funding criteria and in selecting jurisdictions for funding. However, in determining jurisdictions to fund, the National Board recommends that SSA Committees consider the needs and resource gaps in services, consider current state and/or local data in their decision-making, and consider jurisdictions that incorporate or adjoin Native American reservations. Each SSA Committee's funding criteria are subject to review by the National Board, and the SSAs must provide the National Board with selection criteria and the formula used to determine jurisdictions to receive funds. If the selected jurisdictions do not accept awards, SSA Committees may recommend other jurisdictions to receive the unused funds. The SSA Committee may use an administrative allowance of 0.5 percent of the total SSA allocation for its administrative costs.

## C. Oversight Procedures: Summary

EFSP incorporates sound accountability through programmatic and financial monitoring, extensive monthly reports on all elements of program administration by the National Board, IPERA assessments and waivers, and annual independent audits.

FEMA program staff monitors the National Board through the near daily coordination and administration of work conducted by FEMA and the National Board's Fiscal Agent, UWW. This coordination is in addition to grant monitoring, both programmatic and financial, supported

by FEMA's attorneys and OCFO staff. Moreover, FEMA's representative chairs the National Board, the program's governing body by statute, and through this engagement and proximity to the program, receives detailed, thorough reporting on the program's programmatic and financial administration on a monthly basis, and has the ability to engage, question, and be informed regularly by both the Fiscal Agent and members of the National Board.

Through this monthly reporting, both FEMA's National Board Chair and EFSP Program Manager are provided with program administration information throughout the country, including current funding allocations, payments, and expenditures; the recoup and reallocation of any unused or misused funds; subrecipient reporting; compliance problems and corrections; evaluation and consideration of proposed initiatives; development of policies and procedures to address new and changing program needs; and other relevant administration information. The reports are reviewed and discussed by the National Board at its monthly meetings, reviewed and monitored by the FEMA Program Manager present at the meetings, and copies of those reports are provided to FEMA's grants management staff for monthly desk reviews and for scheduling yearly onsite monitoring visits in conjunction with the FEMA Program Manager. Additionally, copies of the independent annual audit are provided to the FEMA grants management staff as well as to FEMA's OCFO staff and the DHS OIG for review and monitoring in preparation for IPERA assessments as determined.

EFSP emphasizes partnership with the private sector, where the Local and National Boards and UWW, as the Secretariat and Fiscal Agent of the National Board, are responsible for the major structures and functions of the program. Program oversight by the National Board, FEMA, and independent auditors ensures that there is strong accountability in the stewardship of the program.

## D. Oversight Procedures: Details

The following is an explanation of the major components of EFSP's monitoring and oversight practices:

**Explanation Regarding Oversight Process:** EFSP is governed by a National Board chaired by FEMA. The National Board meets monthly, generally on the first Friday. During the meetings, staff provides updates regarding programming, funding, the administrative budget, and compliance review, among other subjects. Program staff also keeps minutes of the monthly board meetings. The FEMA Program Manager receives meeting packets with all the materials for each meeting. In addition, National Board staff provides a copy of the Secretariat Report to FEMA's Grant Programs Directorate (GPD) staff. The National Board provides copies of its annual audit to the FEMA Program Manager and the Federal Audit Clearinghouse each year. The National Board holds two meetings per year offsite in local communities, typically selecting one rural and one urban community to visit. The visits typically include conducting National and Local Board meetings, holding open town hall community meetings of LROs and other interested community members, and conducting site visits of several LROs. The FEMA Program Manager travels with the National Board to the locations and participates in the meetings and agency visits. National Board staff participates in the GPD assessment of the program and the IPERA assessment when required. Each year, and as requested, National Board

staff provides data to FEMA reflecting how funds were spent and the units of services provided. With respect to the most recent completed EFSP phase (Phase 32), the program provided 52 million meals, 3.1 million nights of lodging, 82 thousand utility assistance payments, and 75 thousand households with rental/mortgage assistance payments. At its discretion, FEMA conducts independent, annual site visits of the program without the presence of the National Board or its staff.

**Explanation of Reporting Process:** Included in the monthly Secretariat Reports are updates on funds paid for the fiscal year, status of the Final Report/Compliance Review (Final Reports received, LROs reviewed, LROs with exceptions, percentage of dollars reviewed, and dollar amount of funds reviewed), funds available for reallocation, and administrative budget updates. The monthly updates are shared with the FEMA Program Manager and the FEMA GPD staff. In addition to the monthly reports shared with FEMA staff, National Board staff also provides data regarding the funding and units of services provided in each category. As requested, National Board staff provides information to the FEMA Program Manager to address congressional inquiries and other concerns that may be raised about EFSP.

**Compliance Process:** The National Board requires that Local Boards and LROs account for all funds received each fiscal year. Payments are made to funded agencies in two installments. If additional funds are allocated to an agency, a subsequent payment will be made. After making expenditures during the spending cycle, Final Reports are released to Local Boards and LROs for completion to document how the funds were spent. In addition to every LRO having to submit a Final Report, they also must submit spreadsheets to reflect the expenditures made in each services category for which they received funds. Additionally, select LROs must provide financial documentation, including proof of payment to support the expenditures. Local Boards are required to review the Final Report package from the jurisdiction prior to submitting it to the National Board. National Board staff reviews the Final Report Package for the jurisdiction. If an LRO has a compliance exception, staff will place a hold on the agency to prevent the release of funds until the issue has been resolved to the satisfaction of staff. Compliance exceptions occur when there are concerns raised by the National Board that expenditures that have been made by an LRO fall outside of the program's guidelines. These may include expenditures made outside the jurisdiction's spending period, used for security deposits, late fees, or more than one month's rent/mortgage payment, or where no proof of payment was provided to support an expenditure that was claimed. If an LRO receives funds in multiple jurisdictions, it will not receive funds in any of the jurisdictions until the exceptions have been resolved. There is no limitation on how long an exception remains, and it will stay open until it is resolved.

**Variance Process:** The National Board has a process to consider variance requests made by Local Boards on actions that would not be in compliance with program guidelines. Examples of variance requests include to allow the release of funds to an LRO after the National Board's deadline to issue payments for the phase has passed, to allow a jurisdiction to extend its spending period for the phase beyond the options offered by the National Board, or to allow LROs to make an expenditure outside of program guidelines, such as for diapers or feminine hygiene products (the payment of which are now permissible under revised guidelines). Variances must be submitted prior to LROs making expenditures. The request must state clearly the need for the variance, approximate costs, timelines, or any other pertinent information necessary for the

National Board to make its decision. Variances are considered based on their own merit. National Board staff and Local Boards are not permitted to approve variance requests or alter the program or documentation requirements in any way. Only Local Boards may request variances from the National Board. LROs must submit requests to their Local Boards for support and subsequent submission to the National Board for consideration. If a variance is granted by the National Board, it is for a single phase for the LRO. A variance does not carry forward into the next phase and it cannot be applied to a previous phase. A variance must be requested in each phase if it is required.

**Special Funding Request Process:** The National Board may award additional funds to jurisdictions when there are unused funds available for reallocation. Local Boards must submit detailed requests explaining the need in the community, after phase allocations have been determined, to support the request for funding. The request must include the need, the number of persons expected to receive assistance, how the funds will be spent (funding categories) and the agencies that will receive funds. All expenditures must be made within the jurisdiction's spending cycle and must be eligible under EFSP guidelines. LROs must report how funds were spent in their Final Reports. Local Boards must inquire with their SSA Committee to receive funds prior to submitting a request for funding to the National Board. Local Boards and SSA Committees may request additional funding each fiscal year. By way of example, special funding requests have supported communities affected by natural disasters, such as hurricanes and flooding, after disaster funding assistance has been exhausted; man-made disasters, such as contaminated water; and economic crises, such as plant closings and lack of affordable housing.

**Independent Audit:** EFSP has an annual audit each year to meet the requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200). The audit is performed to ensure that the funds are accounted for and that program guidelines and processes are followed, including the monitoring of LROs to ensure their compliance with 2 CFR Part 200. An independent auditing firm performs the audit using Generally Accepted Accounting Principles. As part of the review, EFSP internal controls are examined to ensure that they are followed and are good practices for the program. As necessary, the auditing firm will offer recommendations to management. Select LROs are asked to provide information to the auditors as a part of their review process. Once the audit is completed, it is filed with the Federal Audit Clearinghouse each year as required. The auditing firm makes a presentation to the National Board each year. Additionally, copies of the audit are shared with the National Board and FEMA staff as part of the oversight of the program. EFSP consistently is issued "clean" independent, annual audit opinions, the most recent issued in September 2018.

**FEMA's Grant Programs Directorate Assessment:** FEMA's GPD conducts a financial monitoring assessment of the program onsite at least once a year. In-office desk reviews also are conducted throughout the year. The assessments and reviews are to ensure that EFSP is complying with federal grant regulations and requirements. For the assessment, staff prepares materials and shares information requested in advance and during the assessment. After the review of the material presented in advance, the onsite assessment is conducted with FEMA's GPD staff, FEMA's EFSP Program Manager, and select National Board staff at UWW. National Board staff provides materials for the GPD team to review and responds to questions. After the

review, a report is shared with the National Board by FEMA staff. The most recent assessment conducted in July 2018 was positive, with no compliance issues identified.

**IPERA Assessment:** EFSP participated in an IPERA assessment for 5 years from 2010-2014, under the guidance of the OCFO at FEMA. IPERA requires agencies to complete risk assessments to determine if programs are susceptible to improper payments. If a program is deemed to be at high risk for improper payments, the program must undergo sample testing to determine the level of susceptibility. As required by OMB, the improper payment rate must be less than 1.5 percent and the improper payment dollar value less than \$10 million. After EFSP's last review in 2014, it was determined that EFSP had met the requirement thresholds for errors/findings successfully for 2 consecutive years. EFSP's results were 0.34 percent and \$300,668.58 for the assessment conducted in 2013, and 1.47 percent and \$1,741,675.22 for the assessment conducted in 2014. Consequently, OMB waived EFSP's participation in the 2015 assessment and determined that future participation in each subsequent year would be based on the risk assessment conducted on the program. A risk assessment was completed in September 2018 and EFSP still remains low risk. The Program Manager for EFSP at FEMA serves as the point of contact for the National Board regarding the program's participation in the IPERA assessment.

## E. Other Practices Employed to Reduce Compliance Errors and Increase Program Efficiencies

**Program Manual:** The EFSP Responsibilities and Requirements Manual is made available to SSA Committees, Local Boards, and LROs at the beginning of each spending period. It is always available on the Web site or in a downloadable format for quick reference. It is recommended that all parties participating in the program read the manual to ensure that they understand the program guidelines. Local Boards are expected to understand their responsibilities, especially in selecting LROs for funding and in ensuring that the recipient agencies meet the criteria to receive funds. LROs also are expected to understand and comply with the guidance, especially the eligibility section to prevent compliance exceptions and the return of funds to the National Board. Local Boards and LROs conversant with the manual may reduce avoidable delays in the release of funds.

**Phone Management System:** Beginning in 2014, EFSP implemented a new telephone management system. National Board program staff shares phone duties through the system. The system is used primarily to answer technical questions by Local Boards and LROs, but also by individuals and families seeking services. Technical calls address questions about compliance, Final Reports, board plans and payments, Web site access, and IPERA. 2017 data, the most recent data available, demonstrate that the staff handled 14,170 calls, of which 88 percent were answered within 30 seconds, and only 3 percent of the calls made were abandoned by callers.

**DocuSign System:** EFSP integrated the DocuSign electronic signature software system in 2017 and began using it January 2018 to process the various reports submitted by Local Boards and LROs. Digitizing transactions and signature verification has allowed for faster completion and submission of required plans and reports, hastened the review process, minimized compliance errors, and sped up the release of funds awarded to local agencies.



**Training Workshops:** To answer frequently asked questions, minimize common compliance issues, and train new Local Boards and LRO participants, EFSP offers several Web conference-based training opportunities for both Local Boards and LROs, found at [www.efsp.unitedway.org](http://www.efsp.unitedway.org). The trainings are designed to assist Local Boards and LROs in the administration of EFSP. As trainings are offered, they are recorded and added to the Web site as additional tools for Local Boards and LROs. Among the presentations are trainings on the new DocuSign process, eligible and ineligible expenditures, common compliance exceptions, audit requirements, and reporting requirements. Local Boards and LROs may access the presentations by entering a password on the Web site. For reference in this document, the Web conference-based trainings are, as follows:

- **What is DocuSign:** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/WhatisDocuSign.pdf>)
- **Second Payment Request & Interim Report (for LROs):** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/SecondPaymentRequestwithDocuSignforLROs.pdf>)
- **Second Payment Request & Interim Report (for Local Boards):** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/SecondPaymentRequestwithDocuSignforLB.pdf>)
- **Eligible and Ineligible Expenditures:** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/EligibleandIneligibleExpendituresNovember2016-Revised.pdf>)
- **Spreadsheets:** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/Spreadsheets.pdf>)
- **Common Compliance Exceptions:** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
([https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/Common\\_Compliance\\_Exceptions.pdf](https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/Common_Compliance_Exceptions.pdf))
- **Reallocation:** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/ReallocationWebinarNovember2016002.pdf>)
- **Audit Requirements:** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/ReallocationWebinarNovember2016002.pdf>)
- **EFT:** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/EFTREVISED4.pdf>)

- **Local Board Plan:** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/P35LBPWebinar.pdf>)
- **Certifications Forms:** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/P35CertsWebinar.pdf>)
- **Phase End Date Extension Request:** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/EndDateExtensionWebinar.pdf>)
- **EFSP Overview:** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
(<https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/EndDateExtensionWebinar.pdf>)
- **Final Reports (for LROs):** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
([https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/Final\\_Report\\_with\\_DocuSign\\_for\\_LROs.pdf](https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/Final_Report_with_DocuSign_for_LROs.pdf))
- **Final Reports (for Local Boards):** Web conference-based training, click [here](#). For a pdf copy of the PowerPoint, click [here](#).  
([https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/Final\\_Report\\_with\\_DocuSign\\_for\\_LBs.pdf](https://www.efsp.unitedway.org/efsp/website/websiteContents/pdfs/Final_Report_with_DocuSign_for_LBs.pdf))

## V. Conclusion

Congress recognized the burden placed on charitable groups and local governments in addressing unmet needs of families and individuals who were experiencing homelessness or at-risk of becoming homeless in establishing EFSP. By design, the program reaches out broadly geographically and is inclusive of smaller recipient organizations that provide emergency assistance, but may not qualify for grant assistance under programs and systems devoted to long-term efforts. EFSP's focus is on short-term and immediate needs to help to address the most pressing challenges at the local level. Its Local Board structure determines how best to allocate funding and promote cooperation between agencies. The supplemental nature of the program reflects the interest of the legislation in establishing a partnership in which federal funding helps to build capacity and the reach of local emergency programs, which remain key goals of the *Home, Together* strategic plan. Rigorous oversight and accountability practices by FEMA, the National Board, and independent auditors ensure that there is strong accountability in the stewardship of this public-private program.

Established at the same time as EFSP, USICH's mission is to coordinate and catalyze the federal response to homelessness and to create "a national partnership at every level of government and with the private sector to reduce and end homelessness in the Nation while maximizing the effectiveness of the Federal Government in contributing to the end of homelessness." USICH's work is essential to align the federal response with relevant needs, and *Home, Together* focuses on preventing homelessness, leveraging such programs and resources as those offering immediate emergency services, and addressing food insecurity.

While achievements have been made to end homelessness in America, USICH and its member agencies assess that there is much more work to do, including directing more attention and resources on preventing people from experiencing homelessness in the first place. This area of increased focus aligns closely with the structures, policies, and procedures of EFSP, which emphasizes the provision of support for people at-risk of becoming homeless. FEMA and the National Board are eager to engage with USICH and the respective member departments and agencies that make up the Council in order to ensure alignment with USICH's focus and priorities going forward.

EFSP was the first federal program to provide homelessness assistance to all people in need and helps to address the problems of people in need of immediate shelter and life-sustaining support as part of the revised federal strategy to prevent and end homelessness. To this end, FEMA and the National Board will continue to work with USICH to identify strategies to strengthen engagement between EFSP and USICH member agency programs and initiatives, especially as they support the implementation of *Home, Together*.

## VI. Abbreviations

Abbreviation	Definition
DHS	U.S. Department of Homeland Security
EFSP	Emergency Food and Shelter Program
FEMA	Federal Emergency Management Agency
FY	Fiscal Year
GAO	U.S. Government Accountability Office
GPD	Grant Programs Directorate
HEARTH Act	Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009
HMIS	Homeless Management Information Systems
HUD	U.S. Department of Housing and Urban Development
IPERA	Improper Payments Elimination and Recovery Act
LRO	Local Recipient Organization
OCFO	Office of the Chief Financial Officer
OIG	Office of Inspector General
OMB	Office of Management and Budget
SSA	State Set-Aside
USICH	United States Interagency Council on Homelessness
UWW	United Way Worldwide