



Emergency Food and Shelter National Board Program

Phase 38 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, CARES and 38 almost concurrently.

- Phase 37 (Fiscal Year 2019) \$120 million
- Phase CARES (Fiscal Year 2020) \$200 million
- Phase 38 (Fiscal Year 2020) \$140 million (\$125 million plus National Board reallocation of \$15 million)

Why are Phases 37, CARES and 38 being administered simultaneously?

Due to the delay in the receipt of funds, the EFSP National Board has decided to run Phases 37, CARES and 38 almost concurrently. It is believed this will make it easier for Local Boards and LROs to administer the three phases and prevent further delays in releasing funds to communities.

How does this effect the Spending Periods for Phases 37, CARES and 38?

- **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.
- **Phase 38-** The begin date for Phase 38 is January 1, 2020 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 latest a jurisdiction may spend funds will be May 31, 2021.

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

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 May 31, 2021 for the jurisdiction. The end date selected on the Phase 38 Local Board Plan will also apply to Phases 37 and CARES. Local Boards do not have to submit a separate request to extend the Phases 37 and CARES spending periods.

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 Plan.

1. **Jurisdictions funded in all three Phases 37, CARES and 38-** If your jurisdiction was funded in all three Phases 37, CARES and 38, the spending period selection submitted with the Phase 38 Local Board Plan will apply to all spending cycles. Should you make a change at a later date by submitting a Phase 37, Phase CARES or Phase 38 **Spending Period End Date Extension Request Form**, the change will apply to all Phases
2. **Jurisdictions funded in two of the three Phases** - If your jurisdiction was funded in two of the three phases, Phases 37, CARES and 38, the spending period selection submitted with the Local Board Plan will apply to both spending cycles. Should you make a change at a later date by submitting a **Spending Period End Date Extension Request Form**, the change will apply to both Phases.
3. **Jurisdictions funded only in Phase 37-** If your jurisdiction was funded in Phase 37, but not in Phases CARES and 38, 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 37 **Spending Period End Date Extension Request Form** available on the EFSP website.
4. **Jurisdictions funded only in Phase CARES** - If your jurisdiction was funded in Phase CARES, but not in Phases 37 and 38, 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.
5. **Jurisdictions funded only in Phase 38-** If your jurisdiction was funded in Phase 38, but not in Phases 37 and 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 38 **Spending Period End Date Extension Request Form** available on the EFSP website.

When will the Phase 38 Local Board Plan be due to the National Board?

A complete Local Board Plan for Phase 38 must be submitted to the National Board by **February 5, 2021**. 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.

IMPORTANT: Beginning with Phase 38, the advertisement requirement for EFSP changed. 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 will now be due **30 days** after they are made available to Local Boards.

Will Local Boards have to advertise the availability of Phase 38 funds?

Yes. Local Boards must advertise the availability of funds to the jurisdiction, as required per EFSP guidelines. **Phases 37 and CARES award announcements will not be accepted for Phase 38.**

IMPORTANT: Beginning with Phase 38, the advertisement requirement for EFSP has changed. Local Boards are required to allow interested organizations at least 10 business days to submit applications from the advertisement begin date. The National Board determined that allowing this additional time in the application process should be less demanding on both Local Boards and interested organizations and would potentially encourage more organizations to apply for funding.

Will Local Boards and LROs have to submit new certifications to receive Phase 38 funds?

Yes. All required certifications must be submitted each phase per program guidelines. The certifications required are Phase specific. Phases 37 and CARES certifications will not be accepted for Phase 38.

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 Phase 38 funds?

Yes. Phases 35 and 36 Final Reports will be required prior to the release of Phase 38 funds. *If an LRO has an outstanding compliance exception in any prior Phase, including Phases 35 and 36, 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 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 the Interim Report and Second Payment Request be submitted to receive the second payment for Phase 38?

Yes. The Interim Report and Second Payment Request will be required to release the second payment of Phase 38 funds. *If an LRO has an outstanding compliance exception in any prior Phase, including Phases 35 and 36, 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 three phases.

Will deadlines for submission of report 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 38 Responsibilities and Requirements Manual?

No. The Phase 35 Responsibilities and Requirements Manual (EFSP Manual), Phase 38 Addendum and Phases 37 and CARES Addendum to the Phase 35 EFSP Manual will be used for the administration of all three Phases 37, CARES and 38. A Phase 38 Addendum to the Phase 35 EFSP Manual and Key Changes and Clarification document will be provided 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, CARES and 38 are running almost 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 or CARES and the other month under Phase 38? **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 38? **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. All documents submitted to the EFSP office must be sent via email at documentstoefsp@uww.unitedway.org.