



FEMA and HUD Emergency Food and Shelter Program Transition Plan

January 23, 2017

Fiscal Year 2016 Report to Congress



**Homeland
Security**



Foreword from the Administrator

January 23, 2017

On behalf of the U.S. Department of Homeland Security (DHS) and the U.S. Department of Housing and Urban Development (HUD), I am pleased to present the following report, “FEMA and HUD Emergency Food and Shelter Program Transition Plan,” which has been prepared by the Federal Emergency Management Agency (FEMA) and HUD.



The report has been compiled pursuant to the Fiscal Year 2016 DHS Appropriations Act (P.L. 114-113).

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

The Honorable John R. Carter
Chairman, House Appropriations Subcommittee on Homeland Security

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

The Honorable John Hoeven
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) 646-3900 or to the Acting DHS Chief Financial Officer, Stacy Marcott, at (202) 447-5751.

Sincerely,

A handwritten signature in blue ink, appearing to read "W. Craig Fugate". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

W. Craig Fugate
Administrator
Federal Emergency Management Agency



FEMA and HUD Emergency Food and Shelter Program Transition Plan

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I. Legislative Requirement

This document has been compiled in response to the Fiscal Year (FY) 2016 Department of Homeland Security (DHS) Appropriations Act (P.L. 114-113). Specifically, P.L. 114-113 states as follows:

Provided further, That if the President's budget proposal for fiscal year 2017, submitted pursuant to section 1105(a) of title 31, United States Code, proposes to move the Emergency Food and Shelter program from the Federal Emergency Management Agency to the Department of Housing and Urban Development, or to fund such program directly through the Department of Housing and Urban Development, a joint transition plan from the Federal Emergency Management Agency and the Department of Housing and Urban Development shall be submitted to the Committees on Appropriations of the Senate and the House of Representatives not later than 90 days after the date the fiscal year 2017 budget is submitted to Congress: *Provided further*, That such plan shall include details on the transition of programmatic responsibilities, efforts to consult with stakeholders, and mechanisms to ensure that the original purpose of the program will be retained.

II. Background

Introduction

The President's FY 2017 budget proposal requests statutory authority to transfer the responsibilities for the Emergency Food and Shelter Program (EFSP) from the Federal Emergency Management Agency (FEMA) to the U.S. Department of Housing and Urban Development (HUD) for FY 2017. FEMA and HUD believe that this transition will improve program mission alignment, improve coordination, increase accountability and transparency, and maximize the effectiveness of the use of these funds.

P.L. 114-113 states as follows:

If the President's budget proposal for fiscal year 2017. . . proposes to move the Emergency Food and Shelter program from the Federal Emergency Management Agency to the Department of Housing and Urban Development, or to fund such program directly through the Department of Housing and Urban Development, a joint transition plan from the Federal Emergency Management Agency and the Department of Housing and Urban Development shall be submitted to the Committees on Appropriations of the Senate and the House of Representatives not later than 90 days after the date the fiscal year 2017 budget is submitted to Congress.

The Act further provided that "such plan shall include details on the transition of programmatic responsibilities, efforts to consult with stakeholders, and mechanisms to ensure that the original purpose of the program will be retained." The following plan fulfills these requirements, as well as the requirements of House Report 113-481 accompanying H.R. 4903, Department of Homeland Security Appropriations Act, 2015.¹ House Report 113-481 states:

Prior to considering a change in the agency administering EFSP, the Committee expects FEMA and HUD to jointly brief the Committee on the rationale for the proposed change; efforts by both agencies to engage stakeholders on the proposal; and a plan for transitioning the program to HUD, including a strategy for preserving EFSP's unique, local decision-making structure and an assessment of how the transition to HUD would affect the current EFSP funding distribution to local jurisdictions.

¹ <https://www.congress.gov/congressional-report/113th-congress/house-report/481/1>

Program Description

Congress established the EFSP to supplement the work of local social service organizations within the United States, both private and governmental, to help people in need of emergency assistance. The program serves more than 2,500 local jurisdictions that convene Local Boards, helping to fund between approximately 10,000 and 12,000 Local Recipient Organizations (LRO) that are either nonprofit or governmental in nature.

The EFSP was established on March 24, 1983, as a creation of the House Appropriations Committee and with the President's signing of the "Job Stimulus Bill" (P.L. 98-8). The bill was in reaction to an outcry across the country from charitable organizations for help to supplement local food and shelter providers dealing with increasing demand for their services. Later, it was authorized under the Stewart B. McKinney Homeless Assistance Act (P.L. 100-77, signed into law on July 22, 1987; subsequently reauthorized under P.L. 100-628, and signed into law on November 7, 1988). P.L. 106-400, enacted October 30, 2000, renamed the Stewart B. McKinney Homeless Assistance Act as the "McKinney-Vento Homeless Assistance Act."

By statute, the EFSP is governed by a National Board that sets the program's policies and procedures and determines the funding allocations to local communities across the country as well as the eligible uses of the funds. FEMA chairs the National Board, with membership that includes individuals nominated by six national nonprofit organizations named in the statute (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).

The program is administered at the community level by Local Boards whose membership mirrors the National Board, with a representative of local government in place of the National Board's FEMA member. Local Boards also include a homeless or formerly homeless representative, a Native American representative—if the jurisdiction is located within or encompasses a federally recognized Native American reservation, or if a Native American population is in the jurisdiction—as well as representatives from other agencies active in assisting homeless and hungry persons in the community. Local Boards determine which LROs within their jurisdictions are to be awarded funds, and the National Board then disburses the funds directly to the LROs.

The program also includes a State Set-Aside (SSA) Committee process to address the needs of jurisdictions that do not receive funding through the National Board's main allocation formula. The SSA allows for an award to each state on the basis of the unemployment level in the nonqualifying jurisdictions. The SSA Committees are directed to fund areas of greatest need in their states on the basis of indicators of need that the committees choose.

Federal funds are awarded annually in full to the National Board, and the legislation specifies that funds may be used (in accordance with 42 U.S.C. § 11343(a)) to:

1. 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, and attention to the special needs of homeless individuals with mental and physical disabilities and illnesses, and to facilitate access for homeless individuals to other sources of services and benefits;
2. Strengthen efforts to create more effective and innovative local programs by providing funding for them; and
3. Conduct minimum rehabilitation of existing mass shelter or mass feeding facilities, but only to the extent necessary to make facilities safe and sanitary, and to bring them into compliance with local building codes.

In accordance with the congressional findings and purpose from the law (see 42 U.S.C. 11301, Findings and Purpose), the National Board encourages Local Boards “to provide funds for programs to assist the homeless, with special emphasis on elderly persons, handicapped persons, families with children, Native Americans, and veterans.”

The National Board has determined that the eligible services that LROs may provide to clients using EFSP funds are:

- 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;
- Minimal repairs to mass feeding or sheltering facilities for building code violations or for handicapped accessibility; and
- Supplies and equipment necessary to feed or shelter people, up to a \$300 limit per item.

Rationale for the EFSP Transfer

The EFSP was established to supplement the work of local social service organizations within the United States by providing funds to local communities for homeless programs, including soup kitchens, food banks, shelters, and homelessness prevention services. Federal expertise in homelessness assistance is largely resident within HUD. HUD’s Office of Special Needs Assistance Programs (SNAPS) is responsible for implementing other McKinney-Vento Homeless Assistance Act programs, including the Continuum of Care (CoC) Program and the Emergency Solutions Grants (ESG) Program. The EFSP

aligns with HUD's mission and HUD's work to meet the goals of *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*.

At the local level, the CoC is a group of stakeholders with an interest in preventing and ending homelessness. CoCs include nonprofit organizations, local governments, homeless and formerly homeless individuals, and other stakeholders that are responsible for carrying out the responsibilities outlined in the CoC Program regulation (24 C.F.R. pt. 578), including overseeing a strategy to prevent and end homelessness across a defined geographic area. CoCs engage in comprehensive coordination around homelessness activities in their communities, in some cases already working closely with EFSP Local Boards. In addition, many of the organizations that receive EFSP assistance at the local level also receive CoC and ESG Program funds. Because of this overlap, HUD has longstanding relationships with the various nonprofit and faith-based organizations that make up the EFSP National Board. If HUD were to administer EFSP, HUD more easily could encourage further collaboration between the CoCs and EFSP Local Boards. It also could better align program policies and requirements to reduce burden on providers. In summary, this transition would increase program mission alignment and improve coordination with other social service activities, increase accountability and transparency, and maximize the effective use of these funds.

Many of the activities funded by EFSP are similar to those funded by the CoC and ESG Programs; these similarities will make the transfer of the program from FEMA to HUD feel more seamless at the local level. Such activities include rent, utility assistance, and emergency shelter costs. However, some are different, such as food services. HUD values the different approach that these activities bring to the continuum of services provided as a part of HUD's homeless programs, and values the perspective of these organizations at both the national and local levels. HUD looks forward to working with the National Board to determine how these programs can be aligned even better.

Elements to the EFSP Transfer

- Proposal for EFSP Transfer
- Transition Plan and Stakeholder Outreach Strategy
- Key Transfer Details
- Stakeholder Engagement
- Technical Assistance
- Major Milestones for Transfer

III. Proposal for EFSP Transfer

On February 9, 2016, President Obama released the *Budget of the United States Government, Fiscal Year 2017*. Under the account heading “Federal Assistance” for FEMA in the DHS budget request, the Administration included a proposal to transfer the EFSP from FEMA to HUD’s Homeless Assistance Grants account. The budget stated that the purpose of the transfer is to consolidate and better coordinate assistance to populations in need.

The budget proposes to transfer the \$100 million in budget authority and FEMA’s responsibilities with respect to EFSP funds for FY 2017 to the Secretary of HUD. The budget request proposes only the transfer of FEMA’s responsibilities with respect to the EFSP funds for FY 2017. Per the budget request, the federal responsibilities regarding prior fiscal year funds would remain with FEMA.

Similar transfer authority was proposed in the President’s budget proposals for FY 2015 and FY 2016 and the Senate versions of the appropriation bills for FY 2015 and FY 2016. However, such transfer authority was not included in the House of Representatives’ appropriation bills or the final appropriation acts for FY 2015 or 2016. With the FY 2015 proposal by the President, and the continued interest of Congress, FEMA and HUD initiated discussions regarding the proposed transfer and the drafting of this plan.

To transfer the EFSP legally from FEMA to HUD, a legislative change is necessary. Such legislative change may be made either through the appropriations process or through a change to the authorizing statute for the EFSP. FEMA and HUD are preparing for the possibility that this transfer may occur in FY 2017 through either mechanism.

IV. Transition Plan and Stakeholder Outreach Strategy

FEMA and HUD leadership initially met in April 2014 and then again in September 2014 about the proposed transition. As a result of the September 2014 meeting, the agencies established a FEMA-HUD work group to develop a plan, and the group met regularly throughout the fall and winter of 2014–2015. FEMA and HUD developed this document as the transition plan to address issues regarding the transfer. Because outreach is critical to this transition process, a Stakeholder Outreach Strategy is included in the Appendix.

In addition, FEMA, HUD, and the National Board plan to conduct the following activities:

- Develop specific processes to ensure that the financial interfaces and funds disbursements are seamless for the LROs.
- Identify operational issues required for the successful transition of the program. FEMA has provided information to HUD to assist with this process, including but not limited to a description, table, and flowchart of Responsibilities and Requirements, and sample explanation of the EFSP formula.
- Continue to work closely with Congress, including through a FEMA and HUD joint briefing for the House Appropriations Committee (as requested in House Report 113-481) on the proposed transition plan and the engagement of local stakeholders around the process.

V. Key Transfer Details

1. *Transfer of Funds.* FEMA and HUD are determining the financial procedures required for the efficient transfer of EFSP funds in the event that Congress enacts the transfer for FY 2017. Because this is a non-expenditure transfer, the Treasury Department can transfer funds to HUD before apportionment², and HUD is working to establish the internal protocols to ensure that funds are apportioned quickly so HUD is able to award and disburse the funds expeditiously. This includes determining the procedures for awarding the funds and preparing the drawdown system for administering this program.
2. Over the past few years, the apportionment of funds to FEMA has occurred about 6 weeks after the appropriations bill was signed by the President. HUD also will work to ensure that the apportionment of FY 2017 funds is moved forward expeditiously. All funds prior to FY 2017 funds will continue to be drawn down from FEMA's financial system and administered by FEMA.
3. *Making Changes to the Program.* The McKinney-Vento Homeless Assistance Act exempts the National Board from procedural rulemaking requirements and authorizes it to establish its own guidelines for governing the program. HUD and FEMA are not advocating for changes to the fundamental structure of the program, which would require a statutory change.
4. *Board Chair.* The President's FY 2017 Budget proposes that the Secretary of HUD will carry out the functions of the FEMA Administrator with respect to the EFSP, including those pertaining to the National Board. Historically, the FEMA Administrator has delegated National Board chair responsibilities to high-level personnel within FEMA's organization. The FY 2016 FEMA chair will assist the new HUD chair of the National Board, as necessary, during the transition.
5. *Dual administration of the program.* FEMA will continue to administer FY 2016 and earlier funds until these grant years are closed out, while HUD will be responsible for administering FY 2017 funds. FEMA and HUD plan to collaborate closely to develop processes for answering questions related to particular grant years, providing

² FEMA would prepare a Form 1151, which would have FEMA's accounting information and HUD's accounting information on it to show the transfer of funds. After the Treasury Department processes the form, HUD's Office of the Chief Financial Officer (OCFO) would see it and then prepare an apportionment.

technical assistance to subrecipients (Local Boards, SSA Committees, and LROs), and generally ensuring as seamless a transition as possible. Even though HUD will be the National Board chair for FY 2017, because FEMA still will be administering prior-year funding, FEMA and HUD plan to establish a formal role for FEMA with respect to FY 2016 and earlier funds and to help with the transition. FEMA agrees to attend all Board meetings where FY 2016 and earlier funding is scheduled to be discussed, until these grant years are closed, and agrees to make FEMA staff time available to the National Board to answer questions and resolve any issues pertaining to these grant years.

6. *Communications.* Both FEMA and HUD plan to issue press releases about the transition of the program. HUD also plans to maintain clear and open communication with the National Board and with Local Boards, including issuing listserv messages and other communications to the Local Boards regarding the transfer. This is consistent with how HUD regularly communicates with recipients and subrecipients of its current programs. HUD also maintains pages for its programs on the [HUD Exchange](#) as an easy way for any recipient, subrecipient, member of the public, or other stakeholder to view relevant program information.

7. *Administrative Management.* The federal awarding agency is responsible for awarding the total appropriation to the National Board. The National Board is responsible for grant allocations to the eligible jurisdictions and funding disbursements to LROs, as determined by the Local Boards. The federal awarding agency's responsibilities include:
 - Chairing the National Board;
 - Appointing National Board members;
 - Serving as federal liaison to the National Board; and
 - Providing administrative oversight of the National Board.

The federal awarding agency conducts grant programmatic and financial monitoring of the National Board and its Fiscal Agent, United Way Worldwide, and responds to inquiries and requests from Congress, oversight agencies such as the Government Accountability Office (GAO), the media, and the public. Such administrative oversight includes monitoring for compliance with federal requirements, providing policy guidance and technical assistance, conducting audits, and satisfying inquiries for information.

In addition, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR part 200) apply to the program, so HUD would ensure that the program is administered consistent with these requirements.

FEMA's administration of the program has been supported as a line item in its annual budget for salaries and expenses. In addition to the FEMA staff person who serves as the Board Chair, the program is administered at FEMA by staff in several divisions:

- One full-time employee in the Recovery Directorate (Program Office) who supports the program's management;
- Staff in the Grant Programs Directorate (GPD) who each spend a small portion of their time on the program, assisting with financial oversight of grant funds; and
- Staff in the Office of Chief Counsel (OCC), OCFO, External Affairs, and other functions who facilitate program administration.

It is not anticipated that there will be any transfers of FEMA staff positions to HUD for the program's administration. The FEMA staff member will provide support to HUD, as needed, in offering technical assistance during the process of awarding the FY 2017 grant to the National Board.

Although support for the program at FEMA is spread across several divisions, HUD would centralize program activities in SNAPS. This is because HUD seeks to align EFSP with the other programs administered by SNAPS, and because SNAPS staff has the relevant policy expertise. HUD plans to hire two staff members to work on this program to ensure a successful transition of FEMA's responsibilities to HUD and to administer the program in compliance with all federal regulations and requirements. To this end, HUD anticipates conducting the following activities:

- Establishing sufficient oversight procedures to monitor the National Board, such as procedures for monitoring program activities, audit reviews, and reporting;
- Establishing policies and procedures for control of the funds, such as implementing the system for the National Board to draw down funds and conducting closeout procedures;
- Communicating with the National Board and Local Boards to build relationships;
- Fostering communication between CoCs and Local Boards in communities; and
- Working with the National Board to promulgate policies that will align the EFSP with the goals of *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. HUD anticipates that EFSP will be one of several HUD programs that contribute to achieving the goals of this plan.

Although HUD plans to administer the EFSP from HUD Headquarters, it anticipates that there will be some involvement from HUD local field offices, such as responding

to questions regarding the program's implementation. HUD is establishing internal protocols and plans for administering EFSP, including communicating with field office leadership and staff about the potential transfer.

In addition, HUD plans to collaborate closely with the National Board to develop a long-term strategy for HUD's administration of the program, including how best to achieve the long term policy goals of the program, how to better align with the CoC and ESG programs, and to develop a clear and simple mechanism to report performance. The strategy will recognize EFSP's unique role and funding mechanism while also promoting the goals of Opening Doors and meeting other emergency food and shelter needs.

VI. Stakeholder Engagement

As an initial outreach step, FEMA and HUD attended the National Board's monthly Board meeting on December 5, 2014, to discuss the possible transition and steps for moving forward, obtain Board members' feedback, answer questions, and address any concerns. FEMA and HUD explained to the National Board that HUD values the EFSP's structure for empowering local jurisdictions (counties and cities) in deciding how EFSP funding is used. Indeed, a similar local decision-making framework is in place with HUD's CoC Program. If the EFSP transfer occurs, HUD intends to keep the existing structure in place.

Also at that meeting, HUD leadership described how the program complements the other programs administered by SNAPS, and how EFSP can help to achieve the goal of ending homelessness nationwide. FEMA and HUD also discussed issues concerning the disbursement of funds.

Subsequent to the December 5, 2014, meeting, FEMA, HUD, and the National Board worked together to develop an email message to Local Boards, informing them about the possible transition, which the National Board issued on December 19, 2014. FEMA and HUD again briefed the National Board on July 13, 2015, on the current status of the transition and answered the National Board's questions. FEMA and HUD attended the National Board's monthly meeting on August 14, 2015, to brief on the final draft version of the transition plan and stakeholder outreach strategy that FEMA and HUD had developed to that point. At this time, the final draft version was provided to the National Board and its comments solicited.

HUD and FEMA will continue to collaborate with the National Board on the latest developments and activities required to facilitate an efficient and successful transition.

Beyond these initial steps, FEMA and HUD will work with the National Board to develop a communication plan to engage Local Boards about the transition. The plan will advise Local Boards of the transition steps, and will enable FEMA and HUD to hear and address local stakeholders' concerns and questions about the transition. HUD plans to obtain the listserv for Local Boards from United Way Worldwide so that it can effectively communicate with providers at the local level, consistent with the agency's standard practice for engaging CoC and ESG recipients.

Stakeholder engagement is a key aspect of HUD's administration of its homeless assistance programs. HUD regularly seeks feedback from its recipients and subrecipients, technical assistance providers, advocates, and others on policy issues related to the CoC and ESG Programs. SNAPS would continue this practice with EFSP,

to inform implementation of the program so that it functions efficiently and achieves national and local goals.

HUD and FEMA have worked together with the National Board to prepare a Stakeholder Outreach Plan (Appendix), which addresses past, ongoing, and future outreach to the National Board and to Local Boards and grant recipients.

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 that are named in the statute. FEMA is charged to provide administrative support and act as federal liaison to the National Board. FEMA's Program Office and Congressional Affairs and Public Affairs offices work closely with the National Board and United Way Worldwide to develop supporting informational materials, which notify 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, and conducts audits of the National Board annually and at other times as may be needed. FEMA monitors the EFSP grants both programmatically and fiscally, and awards the annual grant to the National Board in the full amount that is appropriated; for example, in FY 2015—the most recent funding cycle—FEMA awarded to the National Board the entire \$120 million appropriation for the EFSP.

FEMA takes responsibility for stakeholder engagement to support the EFSP and the National Board. Stakeholders include state, local, tribal, and territorial officials; Congress; other federal agencies; and the general public. Outreach to stakeholders can take many forms, including, but not limited to, National Board meetings, grant notifications, congressional inquiries, press releases, and responses to public inquiries about the program.

The National Board is authorized under Title III of the McKinney-Vento Homeless Assistance Act to govern the program and the delivery of its funding to those most in need through local nonprofit and governmental organizations. The EFSP is unique in that the National Board is charged to establish its own procedures and policies and is exempt from the procedural rulemaking

requirements of subchapter II of chapter 5 of title 5, United States Code. However, the National Board must adhere, just as any recipient of federal grant funds, 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.

The National Board is charged through statute to establish written guidelines to include the following:

- 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.

The National Board takes its responsibilities in governing the EFSP seriously. It meets at least monthly to establish or improve procedures, policies, and deliveries; 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. The list below includes some of the significant accomplishments that underscore the commitment and exemplary work of the National Board and its Secretariat and Fiscal Agent, United Way Worldwide:

- Carries out all of the work of the 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.
- Distributes funding annually that reaches more than 2,500 local communities and between approximately 10,000 and 12,000 local service organizations (both charitable and governmental).
- Issued clean, annual independent audits (A-133 audits) since the program's inception.
- Improper Payments Elimination and Recovery Improvement Act of 2012 (IPERIA) assessments conducted in 2014 and 2013 resulted in improper payment rates well below the 1.5-percent error rate thresholds established by the Office of Management and Budget (OMB); IPERIA assessments are conducted to identify and prevent improper payments of federal funds.

Consequently, OMB granted a waiver to an IPERIA assessment in 2015 for the EFSP.

- Hears requests from, 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 non-use.
- Conducts annual listening sessions and on-site visits to meet with Local Boards and provider groups to understand the program's impact and to learn how to simplify and improve its processes and deliveries.
- Publishes annually an operational manual that addresses the responsibilities and requirements—and newly established policies and procedures—under the program.
- Ensures accountable program and expenditure reporting, and adherence to all grant requirements, at all levels.

VII. Technical Assistance

FEMA will work with HUD to facilitate a smooth transfer of the EFSP for FY 2017 and to maintain the integrity and mission of the program. Specifically, with respect to the FY 2017 funds, FEMA will:

1. Provide the services of the current FEMA chair of the National Board to assist HUD in conducting the National Board meetings and to assist with HUD's administration of the program until FEMA-administered grant years are closed out, to ensure that all activities are managed and transitioned appropriately.
2. Provide the services of the current EFSP program manager and other FEMA personnel resources from its grants, financial, congressional, public affairs, and legal offices, as identified and needed, in offering technical assistance through the FY 2017 grant award process to ensure that all grant requirements are met and that there are no gaps in the award of funds to the National Board. Other examples of technical assistance that FEMA could provide pertain to activities such as obtaining the necessary national unemployment and poverty data that the National Board uses in its formula for allocating funds to counties and cities nationwide, and the required 3-day Congressional Notification process conducted prior to the award of funds to the National Board.
3. Provide HUD with information about FEMA's administration of the EFSP for use as a framework from which HUD can plan its administration of the program.

HUD's SNAPS Office will oversee the provision of technical assistance and other guidance on this program. HUD intends to ensure the most efficient use of this valuable resource as it continues to work to prevent and end homelessness. EFSP funds will continue to be used to address important—and, in some cases, unique—components of this goal. HUD plans not only to encourage active collaboration at the local level, but to provide training and guidance that will enable Local Boards and LROs to learn from each other. To this end, HUD will work to identify technical assistance resources, which could include providing onsite and remote training, answering questions (possibly setting up an Ask-a-Question online help desk or a dedicated email inbox), and developing guidance materials to share best practices.

VIII. Major Milestones for Transfer

Milestone	Date/Projected Date	Comments
FEMA-HUD Transition Work Group Holds First Meeting	October 1, 2014	Completed
FEMA-HUD Transition Work Group Holds Second Meeting	October 15, 2014	Completed
HUD Acting Assistant Secretary for Community Planning and Development briefed on potential transfer of EFSP to HUD	October 21, 2014	Completed
FEMA Recovery Directorate leadership briefed on Transition Plan	October 27, 2014	Completed
FEMA prepares Draft Transition Plan for review and comment among FEMA offices (Recovery Directorate, OCC, OCFO, GPD, and External Affairs)	October 27, 2014 Forward	Completed
FEMA and HUD leadership meet to prepare briefing for National Board	December 3, 2014	Completed
National Board meeting – FEMA and HUD brief on the proposed transition	December 5, 2014	Completed
FEMA Draft Transition Plan with adjudicated comments by FEMA internal offices submitted to HUD for review and development of HUD portions of the plan	December 15, 2014	Completed
National Board sends email message to Local Boards informing them of the potential transfer	December 22, 2014	Completed
FEMA and HUD leadership briefs National Board on transition status	July 13, 2015	Completed
FEMA and HUD leadership briefs National Board on the Transition Plan and Stakeholder Outreach Strategy	August 14, 2015	Completed
National Board reviews and provides comments on the Transition Plan and Stakeholder Outreach Strategy	September 15, 2015	Completed

Milestone	Date/Projected Date	Comments
OMB approves Final Transition Plan	TBD	
FEMA and HUD brief staff to the House and Senate Appropriations Committees	TBD	FEMA's Congressional Affairs Division may advise that briefings be conducted for other committees and/or responses be provided to congressional office inquiries.
FEMA, HUD, and the National Board provide instruction on the transition to Local Boards (see Appendix)	TBD	
FEMA and HUD OCFOs meet to address program transfer details	TBD	
FEMA, HUD, and National Board Fiscal Agent, United Way Worldwide, determine system requirements for disbursement of FY 2017 funds	TBD	
President signs a DHS FY 2017 Appropriations Bill that includes the EFSP transfer	Estimated December 2016 – March 2017	
FEMA and HUD issue press releases on the transfer	Within 1 week of Appropriations Act enactment	Press releases will have been prepared in advance.
HUD chairs first National Board meeting after the transfer	First Friday of the month following Appropriations Act enactment	FEMA assists.
OMB apportions FY 2017 appropriated funds to FEMA and apportions the transfer to HUD	Approximately 6 weeks after Appropriations Act enactment	Historically, approximately 6 weeks after DHS appropriations bill signed.
HUD initiates its grant processes for awarding the funds to the National Board	As soon as Appropriations Act enacted	FEMA's Recovery Directorate and GPD advise, as necessary, relative to FEMA grant processes.
HUD works with United Way Worldwide and FEMA, as necessary, to prepare congressional notification materials	TBD	FEMA Recovery Directorate and External Affairs assist, as necessary.
HUD notifies Congress prior to award, as required	TBD	FEMA Recovery Directorate and External Affairs assist, as necessary.

Milestone	Date/Projected Date	Comments
HUD awards funds to National Board	TBD	The award should be 30 days after funds are available, but the apportionment of funds and grant processes in recent years have extended the time.
National Board to finalize the funds allocation formula	TBD	Unemployment data obtained from Bureau of Labor Statistics; poverty data obtained from Bureau of the Census, American Community Survey. FEMA assists.
United Way Worldwide updates National Board website to announce allocations to jurisdictions	This occurs shortly after National Board finalizes formula and HUD announces allocations.	HUD notifies United Way Worldwide to perform this function. FEMA assists, as necessary. Announce the same day as the award of funds to the National Board.
HUD's External Affairs responds to any congressional and media inquiries about the funding	Ongoing	FEMA assists, as necessary.
National Board meetings	Monthly Meetings (first Friday of each month) or as newly determined	Purpose of the meetings is to administer the program, set policy, and address additional requests for funding and requests for variances to compliance matters. FY 2016 FEMA Chair assists, as necessary.
National Board (including HUD chair) conducts site visits/listening sessions	TBD	Historically, the National Board has conducted at least two site visits/listening sessions per year. FEMA will assist, as necessary.
HUD, FEMA, and National Board to consider scheduling an assessment of the transition and plans for FY 2018	End of FY 2017	

Appendix: Stakeholder Outreach Strategy

Outreach Strategy to State Set-Aside Committees, Local Boards, and Local Recipient Organizations

Outreach Conducted

- Federal Emergency Management Agency (FEMA)-U.S. Department of Housing and Urban Development (HUD) Presentation to National Board – December 5, 2014
 - Engagement of National Board on Outreach Plan and Transition Plan
 - FEMA and HUD leadership discussed how the transition of the Emergency Food and Shelter Program (EFSP) to HUD would fit in with HUD’s homelessness programs, answered the Board members’ questions, and discussed possible approaches for outreach to stakeholders. HUD anticipates that the EFSP will be one of several HUD programs that will represent an important resource to contribute to achieving the goals of *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. It was an overall productive and positive discussion, and the Board expressed interest in being involved.
- Email to EFSP State Set-Aside (SSA) Committees and Local Boards – December 19, 2014
- FEMA-HUD briefing to the National Board on the status of the transition – July 13, 2015
- FEMA-HUD briefing to the National Board on the contents of the Transition Plan and Stakeholder Outreach Strategy – August 14, 2015
- FEMA and HUD attended the National Board’s August 14, 2015, meeting to brief the Board on the transition plan. Additional meetings will be planned to keep the National Board current on all transition developments.

Outreach Planned – Before the Transition from FEMA to HUD

In general, the strategy to engage a broader audience of EFSP stakeholders is to conduct a national broadcast (either live, with questions taken by phone/email, or pre-recorded) first, and then follow up with Local Boards, SSA Committees, and Local Recipient Organizations (LRO) afterward. By doing this high-level proactive outreach first, HUD and FEMA can present similar material to what was discussed at the National Board meeting. This can allay fears and answer many questions that we already know about ahead of time; that way, the questions we do receive will raise new issues for FEMA and HUD to consider.

HUD and FEMA plan a four-step approach, to be implemented in coordination with the National Board:

1. HUD, FEMA, and National Board leaders conduct a broadcast explaining the proposed transition, including some of the following topics:
 - FEMA will provide background and explain that the program has not yet transferred to HUD and will not unless Congress includes language in the appropriations act. FEMA will explain that the permanent transfer of the program will result from revisions to Title III of the McKinney-Vento Homeless Assistance Act or by the inclusion of futurity language in an appropriations bill.
 - HUD will explain that the office that would administer the program is the Office of Special Needs Assistance Programs (SNAPS); that HUD already has relationships with many of them because it runs the Emergency Solutions Grants (ESG) and Continuum of Care (CoC) programs and many of the same groups are its existing grantees; that HUD's intent is to enhance the program processes and coordination between the federal, National Board, and local levels to increase the efficiencies and accountability of the program to better meet the goals of preventing and ending homelessness.
 - Resources for questions, and follow-up to the video.
2. Establish a dedicated email box to take questions about the proposed transition. HUD, FEMA, and the National Board will determine the most appropriate mechanism for handling questions. In addition, we would want to make clear when we announce the broadcast that we will address, on the broadcast, any question that comes in 1 full business day before the broadcast. The email box will remain open after that date for providing answers to additional questions.
3. After the broadcast is conducted, written frequently asked questions will be prepared for dissemination via the National Board.
4. HUD plans to convene "listening sessions" at appropriate conferences, as determined.

Outreach Planned – After the Transition from FEMA to HUD

- HUD will provide more detail regarding the specifics of the transition as processes and plans are developed, and will work with the National Board to disseminate the information to local stakeholders. This detail includes, but is not limited to, specification of roles and responsibilities, an updated flowchart for the grant process, and FAQs.
- HUD plans to obtain from the National Board's Fiscal Agent, United Way Worldwide, the listserv for SSA Committees and Local Boards to communicate better with providers at the local level, much as it already does with the CoC and ESG listservs.
- HUD will collaborate closely with the National Board to develop a long-term strategy for HUD's administration of the program, including how best to achieve

the long-term policy goals of the program, how to align with the CoC and ESG programs better, and to develop a clear and simple mechanism to report performance.

- Post information on National Board and HUD and FEMA websites.