

EMERGENCY FOOD AND SHELTER NATIONAL BOARD PROGRAM (EFSP)

LOCAL BOARD STAFF RESPONSIBILITIES

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HOW ARE LOCAL BOARDS STAFFED: In many cases, the Chair of the Local Board also performs all necessary administrative duties for the Local Board. However, many Local Boards find that having one central point of contact through a designated staff person to be helpful.

HOW IS THE LOCAL BOARD STAFF SELECTED: Generally, the chair either performs the staff function or assigns someone to staff the EFSP in their community from the Chair's own organization. Some Local Boards request a specific agency (not the Chair) to staff the program.

FUNCTION OF THE STAFF: The Local Board staff usually serves as the point of contact in their jurisdiction. The staff person also serves as the liaison between the Local Board and the funded agencies as well as between the Local Board and the National Board. They perform the necessary administrative duties for the Local Board such as arranging meetings, taking meeting minutes, answering LRO questions regarding their funding, eligibility, and compliance issues, assist with monitoring LROs, filing necessary paperwork with the National Board, etc. Most Local Board staff have other organizational responsibilities in addition to the EFSP. **The staff may not make decisions for the Local Board on funding, eligibility, compliance, reallocation, or other programmatic issues.**

COMMUNICATION WITH THE LOCAL BOARD STAFF: The National Board keeps a file on every jurisdiction funded as well as a computer database of all Local Boards. The Local Board staff may serve as the point of contact for the National Board in a jurisdiction instead of the Chair. **Any communication from the National Board must be shared immediately with the Local Board Chair and Local Board members.**

The Local Board staff should review with the Local Board members the manual published for each phase of the program. The Preamble and sections on Local Board Responsibilities, LRO Responsibilities, and Eligible/Ineligible Costs are important sections and should be ready by all Local Board members. The EFSP Responsibilities and Requirements Manual is available under the password protected section of the EFSP website.

HOW IS THE STAFF POSITION FUNDED: If a Local Board finds it necessary to have a dedicated staff person, the administrative allowance granted to the jurisdiction may be used for funding. The administrative allowance is limited to 2% of the jurisdiction's award. A portion or all of the administrative allowance may be used to perform the necessary functions of the Local Board. Many of the organizations staffing the program do not charge administrative costs to the Emergency Food and Shelter Program, opting instead to allocate the 2% allowance to direct program costs.

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ADMINISTRATIVE COST INFORMATION

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ADMINISTRATIVE COSTS: The Local Board decides the awarding of administrative funds to agencies. Agencies are encouraged to apply for administrative funds to assist in administration of the EFSP. The Local Board may want to consider several ways of utilizing the administrative funds:

- one agency retains the full two percent to handle all administrative matters on behalf of the jurisdiction;
- each agency is allowed up to two percent to be used for its own administrative costs;
- allow the agency administering the EFSP for the jurisdiction to claim a portion of the administrative allowance and the funded agencies the other portion (i.e., the jurisdiction administrator claims 1/2 of 1% and the funded agencies claim 1 1/2%); or,
- the Local Board does not take any funds for its own use and does not allow the funded agencies any as well – all funds are put into allowable program costs.

Congress sets the total amount of administrative funding in the appropriation legislation. The Emergency Food and Shelter National Board Program is currently permitted to use 3.5% for administration: State Set-Aside Boards - .5%; National Board - 1%; and local jurisdictions - 2%. In no case may a jurisdiction take more than 2% administrative allowance. The administrative allowance is a part of the jurisdiction's award and not an addition to it.

The National Board does not routinely require documentation to be submitted for administrative expenses with the Final Report. Documentation for administrative expenses must be maintained and may be requested for review by the Local Board, National Board, DHS/FEMA, or the Office of Management and Budget. For the Improper Payments Information Act (IPIA) assessment, administrative documentation is required. If requested, this documentation must be available for review either on-site or submitted to the requesting entity. Failure to provide administrative documentation received in support of EFSP administration will result in a compliance problem.

EMERGENCY FOOD AND SHELTER NATIONAL BOARD PROGRAM (EFSP)

ADVERTISING RESPONSIBILITY OF LOCAL BOARD

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ADVERTISING RESPONSIBILITY: The first matter of business for Local Boards in each phase of the EFSP is to advertise the availability of funds for their jurisdiction. *Advertising must precede any allocation decision.* The National Board requires that the advertisement appear in print and provides a sample press release in the manual published for each award phase. The Local Board may use this, adapt it, or choose some other form of printed advertisement. The advertisement may be either paid or donated. An ad in the legal section or a press release printed in the local paper is acceptable. Local Boards may also have the advertisement read over radio or appear on television stations. In addition, some Local Boards choose to notify service providers directly (e.g., through the mail, by fax, by e-mail or by telephone). While this direct notification is effective, it is not a substitute for a printed, public announcement. Local Boards should ensure that all service providers are aware of the funding.

Regardless of the choice of print media as well as other media the Local Board makes, the vital point is that the advertisement must be presented in a widely available forum since any agency providing or capable of providing emergency services must have the opportunity to apply for funding.

All advertisements should include:

- area or jurisdiction funded/Local EFSP Board
- source of funding*
- award amount
- purpose of funding
- eligible agencies
- contact for application
- deadline for applying

*The source of funding is a federal appropriation from Congress to the Emergency Food and Shelter National Board Program. The National Board selects jurisdictions (cities or counties) for funding, *not specific agencies*. The federal department responsible for this program is the Department of Homeland Security's Federal Emergency Management Agency (FEMA). These are not state/county government or United Way funds.

A copy of the printed advertisement must be available upon request to the National Board, federal authorities and the public.

EMERGENCY FOOD AND SHELTER NATIONAL BOARD PROGRAM (EFSP)

ALLOCATIONS INFORMATION

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ALLOCATION PROCESS: The National Board does not mandate any specific allocation process. It does however, require that all agencies applying for funding be treated consistently. **Local Board membership must have no relationship to funding.** Since member agencies of the Local Board may also apply for funding, *care must be taken that every applicant is judged by common, consistent criteria.* This is a matter of fairness that is crucial to the credibility of the program.

Local Boards must consider all applicant agencies providing or capable of providing services under this program for funding. Although all eligible applicants must be considered, **the Local Board's job is to focus funding so that the most critical needs will be met in the most efficient and effective manner.**

Local Boards must ensure that agencies selected for funding meet the requirements on the Local Recipient Organization (LRO) Certification Form and that all selected LROs have signed the LRO Certification form prior to the submission of the Local Board Plan at the beginning of each phase of funding. Local Boards must retain the LRO Certification forms and have available, if requested. In addition, in selecting agencies for funding, Local Boards should ensure that agencies selected have the capacity to either charge back or expend funding during the jurisdiction's selected spending period. Agencies selected must be able to completely and accurately obtain, retain and submit (if requested) the required expenditure documentation with their Final Reports.

Local Boards may want to consider whether or not an applicant organization is supplying additional resources of its own (e.g., caseworkers, clothing, job training). Local Boards may want to focus funding for a particular service or services in one agency per geographic area to avoid duplication of service.

The Local Board must make all allocation and reallocation decisions. To conform to the philosophy and intent of the EFSP (as directed by Congress), agencies should be selected for funding based on their ability to supplement and extend their operations with funds from the EFSP. EFSP funds are not intended to become a regular and expected part of any agency's operating budget. Neither are these funds intended to make up for budget cuts in other funding sources. Local Boards may consider rotating funds among agencies in order to help the program remain supplemental and may also focus the funding to areas of determined need.

EFSP funds are intended to respond to the changing hunger/homeless needs both nationally and locally; **not to maintain the status quo.** The intent of EFSP funding is to address hunger/homeless needs to make a difference -- not to simply spread dollars among all eligible applicants.

Local Boards should meet prior to receiving applications for funding to assess the changing situation in their jurisdiction with regard to hunger and homelessness. The Local Board should consider such questions as: Has the client mix changed?; Is there a new group of homeless or hungry people?; Are the homeless in the same places that they were last year?; Is housing more or less available?; Are there new funding sources covering a part of the need addressed by the EFSP?; Have new services or agencies developed?, etc. Most importantly, they should ask themselves "How can the limited funds available through the EFSP best be used at this time to address the changing need in our jurisdiction?"

Local Boards should evaluate the needs in their jurisdiction, the resources available to address those identified needs and identify the gaps between the needs and the resources. EFSP funds should be used to fill those gaps in food and shelter services that are eligible under the EFSP.

The National Board requires Local Boards to have a formal application process. The specific process is determined locally, but the following elements should be considered: written application form/process, limit discussion/presentation on each agency to a pre-determined period of time; provide written notification to each funded agency as well as to agencies not selected. In the written notification to funded agencies, the Local Board may limit an agency's award to specific programs (e.g., only food vouchers, only utility assistance, etc.).

Please Note: The National Board guidelines require that an agency, if represented on the Local Board, abstain from voting on its own allocation. Additionally, any Local Board members with a vested interest (board member of, employee of, relative of) in any particular agency's award should also recuse themselves from voting in order to avoid the perception of a conflict of interest.

ALLOCATIONS AND ELIGIBILITY GUIDELINES: Although the Local Board may fund any agency, it may only fund eligible program expenditures. If an agency's application for funding contains items that the Local Board is unsure of regarding eligibility, the Local Board **must consult with the National Board staff prior to making the allocation decision.** The Local Board may set local guidelines, but local guidelines may not conflict with the National Board's guidelines.

The Local Board decides which agencies to fund and in what program categories the agencies will be funded. The Local Board may limit an agency's expenditures to a specific area of eligibility. Local Boards should indicate in writing the categories in which a specific agency is funded and any limitations the Local Board is imposing. If an agency is permitted to claim the per meal cost for mass feeding or the per diem for mass shelter clients, the Local Board must indicate this in writing, as it requires their approval.

Local Boards that choose to fund homelessness prevention efforts (rent/mortgage, utilities) should consider designating one agency as the central intake point. This makes it easier for families facing eviction to have one initial point of contact. Also it helps set up a network that can share the workload evenly and guard against any fraud or other abuse of the system.

REALLOCATIONS: During the course of the program, Local Boards may find it necessary to shift funds from one agency to another or from one service category to another. Local Boards may make reallocations at any time. Reallocations may be made for a variety of reasons (i.e., change in needs of jurisdiction, change in needs of LRO, spending patterns of LROs, misuse of funding).

Local Boards must approve shifts in funding by LROs. The Local Board must inform the National Board in writing of reallocations between LROs. Local Boards may not add new LROs through the reallocation process without approval of the National Board.

EMERGENCY FOOD AND SHELTER NATIONAL BOARD PROGRAM (EFSP)

APPEALS PROCEDURES

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APPEALS FOR FUNDING: The National Board mandates that Local Boards have a *written* appeals process that should meet the following tests:

- Is it available to the agencies upon request?
- Is it available to the public upon request?
- Is it timely?
- Does it include the basis for appeal?

Each Local Board is required to have a written appeals process available to the public that outlines what steps will be taken if any agency appeals the funding decisions the Local Board has made. The National Board suggests, when possible, that a separate panel of the board hear appeals, apart from the members who made the original allocation decisions. This is an argument for expansion of the board since it allows the body to separate its functions.

The Local Board may set a deadline to receive appeals, such as 30 days after decisions have been made and conveyed to all applicant agencies. All appeals should be considered in a timely manner, and the appealing agency should be notified in writing of the Local Board's decision on the appeal promptly.

An agency filing an appeal should follow the Local Board's written procedures. An appeal should include the basis for the appeal, such as correction of erroneous application information, provision of information not previously available, or allegation of bias, fraud, abuse or violation of federal or National Board guidelines.

The first level of appeal is with the Local Board. The National Board only considers appeals when there is a significant question of misapplied guidelines, fraud, or other abuse on the part of the Local Board.

Agencies may not appeal the requirements stated on the LRO Certification Form. Agencies must meet these requirements to be considered for funding.

EMERGENCY FOOD AND SHELTER NATIONAL BOARD PROGRAM (EFSP)

DISASTER RELATED EXPENSES

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Can EFSP funds be used for providing any type of disaster assistance? No, *disaster expenses incurred in response to Presidentially-declared major disasters are not eligible expenses under the EFSP.* This includes disaster assistance that agencies might provide following disasters (e.g., flood, earthquake, hurricane, tornado). Although the federal disaster assistance program is housed within the Department of Homeland Security's Federal Emergency Management Agency (FEMA), the EFSP is a separate FEMA program, and funding for the EFSP is not intended to be used as a form of disaster assistance.

Many agencies routinely work with FEMA to provide assistance following disasters, and some of these agencies may also provide assistance following more localized events, such as single family fires. Two of these agencies by law are included on EFSP Local Boards – American Red Cross and The Salvation Army. Although these agencies work with FEMA to provide disaster assistance, EFSP funds cannot be allocated for disaster response because they are appropriated for different purposes.

Local Boards cannot allocate EFSP funding to agencies for or in anticipation of a disaster.

How can agencies that are traditionally known for providing disaster assistance participate in the EFSP? Agencies that provide disaster response often provide emergency services (e.g., food, shelter, rent, utility assistance) on a year round basis in their regular programs, not related to disaster. If any agency has emergency programs that fit the EFSP and the agency meets the requirements stated on the Local Recipient Organization Certification Form, they are eligible to be considered for funding by their Local Board.

Additionally, the immediate, initial response to the disaster may not be all of the help an individual or family needs; after the initial response, the individual or family may apply for other services not typically considered disaster-related.

What are some examples of how agencies providing disaster assistance can provide services under EFSP?

Example 1: An agency that provides emergency shelter for single family fire victims for three days might also run a rent program. After the family has been housed for three days, they may

still need assistance. Perhaps their landlord has decided not to repair the property and they need to find another place to live. The family may need assistance with first month's rent.

Example 2: An agency traditionally known for disaster assistance runs a year round homeless shelter. The homeless shelter assists all individuals seeking shelter, not just victims following a disaster. It is eligible to be considered for funding for the shelter's services.

Example 3: An agency assisted a fire victim last year and now that victim is seeking assistance with paying utilities. If the agency runs a utility program and has received EFSP funding, the individual could be assisted.

Example 4: An agency traditionally known for disaster assistance has expanded their services out of community need and is now operating a food pantry on an ongoing basis to assist with the daily food and nutrition needs in the community, not just providing food to fire victims. It is eligible to be considered for funding for the food pantry.

Can individuals and families whose original need was created by a disaster be assisted with EFSP funding? *Yes, and like all clients assisted with EFSP funding, all other resources must be exhausted. If an individual or family's needs created by disaster were addressed and no other disaster assistance or other community assistance is available to them, EFSP funding may be used to provide eligible services under the EFSP.*

EMERGENCY FOOD AND SHELTER NATIONAL BOARD PROGRAM (EFSP)

GUIDELINE EXCEPTIONS

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EXCEPTION PROCEDURE: The National Board has a procedure should a Local Board find it necessary to request to allocate funds to an otherwise ineligible expenditure. The Local Board must, *in advance of the expenditure, request an exception* for the expenditure from the National Board. The request **must be in writing** and should include the rationale for the expenditure, costs (estimates), timelines, and any other information necessary for the National Board to make its decision.

The purpose of the guidelines exceptions is to allow some flexibility for the expenditure of program funds in local communities for food and shelter related needs that *meet the intent* of the EFSP. The National Board expects agencies and Local Boards to bring to them exceptions which request innovative use of EFSP funds, assistance in meeting a food or shelter need which meets the program's intent but is not an eligible expense, using EFSP funding as a portion of the total funding for a food or shelter related project, etc.

Some examples of exceptions the National Board has heard which have become a part of the EFSP are: purchase of vegetable seeds and vegetable plants for community gardens; repair of small equipment for mass feeding or mass sheltering; payment of utilities for clients in order to keep them in their homes.

The National Board, **as a last resort**, will also hear requests for exceptions regarding program compliance issues. *The Local Board and Local Recipient Organization must have made every effort possible to resolve the compliance issue before the National Board will review the records.* This effort must include obtaining or recreating documentation that has not been supplied or has been destroyed as well as providing alternate documentation.

Each request is judged on its individual merits and is given on a one-time basis for the phase. No exceptions are given to Local Boards or LROs for the duration of the program. In addition, *no exceptions will be given for cash expenditures or for payments made to staff or volunteers as reimbursement for program expenditures;* all vendors must be paid by an approved method of payment.

Local Boards may not grant exceptions on National Board guidelines. **Only the National Board has the authority to grant exceptions to its guidelines.**

EMERGENCY FOOD AND SHELTER NATIONAL BOARD PROGRAM (EFSP)

LOCAL BOARD CHAIR RESPONSIBILITIES

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WHO CONVENES THE LOCAL BOARD: The National Board sends the award notification to the Local Board Chair and designated contact of record in previously funded jurisdictions. In newly funded jurisdictions, the local United Way is contacted. If there is not a United Way in the jurisdiction, the local affiliate of the American Red Cross, The Salvation Army, or other National Board member agency is contacted. If none of these exist, the local unit of government is notified.

In each award phase of the EFSP the Local Board **must be reconvened in previously funded jurisdictions or convened in newly funded jurisdictions.** The Local Board is a new entity in each award phase.

HOW IS THE LOCAL BOARD CHAIR SELECTED: Just as the Local Board is new each phase, so is the Local Board Chair. **The members of the Local Board elect the Chair, after all members have been designated by their agencies.** Any member of the Local Board is eligible to be considered to serve as chair.

The Chair is not an honorary position. If the Chair cannot attend meetings, another Chair must be elected. If the Chair cannot attend a particular meeting, another member of the Local Board may be designated by the Chair to serve in the Chair's absence. The Local Board may decide to elect a Vice Chair for this purpose.

FUNCTION OF THE CHAIR: The Local Board Chair convenes all meetings and is responsible for seeing that national policies as well as any local policies are implemented. **Neither the Chair nor staff may make decisions for the Local Board.**

COMMUNICATION WITH THE LOCAL BOARD CHAIR: The National Board keeps a file on every jurisdiction funded as well as a computer database of all Local Boards. The Local Board Chair usually serves as the point of contact for the National Board in a given jurisdiction, but the Chair or the Local Board may designate staff as the contact. **Any communication from the National Board must be shared immediately with Local Board members.**

The Local Board staff should review with the Local Board members the manual published for each phase of the program. The Preamble and sections on Local Board Responsibilities, LRO Responsibilities, and Eligible/Ineligible Costs are important sections and should be ready by all Local Board members. The EFSP Responsibilities and Requirements Manual is available under the password protected section of the EFSP website.

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LOCAL BOARD MEMBERSHIP INFORMATION

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LOCAL BOARD MEMBERSHIP: Where, in your community, there are affiliates of the six national voluntary organizations represented on the National Board, those organizations must be invited to sit on the Local Board. These national voluntary organizations are American Red Cross; Catholic Charities, USA; National Council of the Churches of Christ in the U.S.A.; The Jewish Federations of North America; The Salvation Army; and, United Way Worldwide. The highest ranking county official must be invited to represent local government in lieu of the Federal Emergency Management Agency (FEMA) member.

The enabling legislation and National Board guidelines also mandate Native American representation on the Local Board. The report for the authorization reads as follows "Requires local program boards within 30 days of enactment, to include within their Board a member of an Indian Tribe when it administers program funding in a locality or a portion of the locality, which is located on an Indian Reservation".

In addition, each funded jurisdiction is required to have a homeless or formerly homeless individual serve on their Local Board. This individual should be selected carefully and be someone who can contribute to the Local Board's discussions and decisions. If no homeless or formerly homeless individual can be found to serve, a former recipient of emergency services may be substituted. A homeless advocacy group may be invited to serve this roll *only if* none of those noted previously are available to serve.

In jurisdictions where affiliates of National Board agencies do not exist, other appropriate groups and individuals should be invited to sit on the Local Board. Care should be taken to have at least eight members including local government, a homeless representative, and community based organizations (non-profit and voluntary) that have experience/knowledge of community need and resources. If there is no Catholic Charities, a comparable group or a priest could serve. In the case of The Jewish Federations of North America (JFNA), if no local Jewish Federation exists in a given jurisdiction, the Board must first check with JFNA to identify local JFNA-affiliated Jewish organizations to serve. Please check their web site www.jewishfederations.org or you may call the JFNA Washington at (202) 785-5900. If none are available, then a comparable group or synagogue representative may be asked to serve. The National Council of Churches is a Protestant and Christian Orthodox group and could be

represented by a local ecumenical or interfaith organization including community ministries.

Local Board membership is not honorary. If a member regularly cannot attend meetings, that member must be replaced by the member's designated agency. If a member must be absent from a meeting, the member's organization may designate an alternate.

EXPANSION OF THE LOCAL BOARD: Annually, the designated members of the Local Board are encouraged to expand -- whether to substitute for designated agencies which do not exist or refuse to serve, or to provide more comprehensive representation of the affected jurisdiction. **Care should be given to involve groups/individuals who have an awareness of the hunger/homeless needs of the community.** For example, a church ministerial alliance or food bank might be appropriate to assist in the decision-making process. A community volunteer who is active with local hunger/homeless coalitions would be another consideration.

Another example of creative expansion would be enlisting technical representatives from local utilities who would be aware of what assistance was already available to prevent utility cut-offs. A utility representative may also be helpful in assisting Local Recipient Organizations (LROs) to obtain the proper documentation from the utility company.

When expanding, a Local Board should also consider including minorities and agencies serving the special emphasis groups mentioned specifically in the authorizing legislation: elderly, families with children, Native Americans, veterans, and the mentally and physically disabled. In addition, the jurisdiction should be geographically represented. Local Boards should recruit widely and consider setting up panels as appropriate (i.e., needs assessment, allocations, appeals).

In designing the EFSP, Congress created a unique public-private partnership which brought the voluntary sector and the government together to address critical human needs in the areas of hunger and homelessness. When expanding, Local Boards should carefully cultivate this public-private partnership.

WHO SERVES FOR AN AGENCY: The organization invited to participate designates its representative (through its legally designated governing body or officer). Representation is open to volunteers or professionals, and the Local Board may not insist that a particular person represent an organization.

LENGTH OF SERVICE: Since each award phase is new, the Local Board is a new entity in every phase. The convener of the Local Board must ask each agency to designate or redesignate a representative every program year.

If an individual is replaced by an agency, that person may not continue to serve as a representative of that agency.

EMERGENCY FOOD AND SHELTER NATIONAL BOARD PROGRAM (EFSP)

LOCAL BOARD PROCEDURES AND MONITORING

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Local Board Procedures: Local Boards must establish and follow regular procedures. The National Board requires Local Boards to select one of two meeting options. Local Boards may either meet quarterly or semiannually and submit meeting minutes with their Final Report. The National Board meets monthly and encourages Local Boards to meet quarterly. Meetings may be conducted via conference call. A majority of members must be present for the meeting to be official, and attendance and decision-making minutes must be kept. A suggested meeting schedule for quarterly meetings is:

- Winter*: Allocation of EFSP award; determine end date for spending period
- Spring: Monitor LROs activities (review financial and/or service documentation)
- Summer*: Ensure all second check requests have been submitted to National Board; review previous phase's compliance status; reallocate funds if necessary; confirm end date for spending period
- Fall: Determine funding priorities for future funding

*This is the suggested meeting schedule for Local Boards opting for semiannual meetings. If the semiannual option is selected the Local Board must have procedures in place to ensure that all Local Board responsibilities regarding determining funding priorities, monitoring LRO activities, etc. take place.

Meeting minutes must be approved by the Local Board at the next meeting. Minutes must be available to the National Board, federal authorities, and the public upon request. Other public information that must be provided on request includes local board membership, local recipient organizations funded, and services funded.

Local Boards are also responsible for setting funding priorities by determining which services will be available and the amounts to be spent. This is the first step in the allocation process. The next step is the allocation of funds to agencies best able to provide the priority services.

MONITORING: Once LROs are selected for funding, the board should share the responsibility for monitoring the agencies. Local Boards are required to monitor agencies, both for service provision and eligibility of expenditures. There are many different ways of monitoring; however, each funded agency should be monitored in some way. The National Board requires that each agency submit to the Local Board an interim report on expenditures, which is forwarded to the National Board with the agency's second payment request. In addition, the National Board encourages the Local Board to establish a formal monitoring process.

During the course of the program Local Boards may ask the agencies to submit their documentation for review, conduct site visits of the agency, etc. The Local Board may also request that any funded agency provide them with a copy of the agency's most recent annual audit.

Site visits can be used to further validate the appropriateness of expenditures, that equipment purchased is on site and in use, sign-in sheets and case records are being kept and in order, number of individuals the facility can accommodate, etc.

For those agencies claiming the per diem for mass shelter or mass feeding clients, the Local Board is encouraged to ask for documentation in addition to the per diem/per meal schedule required by the National Board. That is, Local Boards should examine *daily* sign-in sheets to verify number of clients and agency expenditures to determine that costs charged to the EFSP are related to the provision of mass shelter or mass feeding and not used for other programs.