

**Office of Refugee Resettlement (ORR)
Ethnic Community Self-Help (ECSH) Program
Implementation Guidelines**

PROGRAM OVERVIEW

The goal of the ECSH Program is to support Ethnic Community-Based Organizations¹ (ECBOs) in providing refugee populations with critical services to assist them in becoming integrated members of American society. An ECBO is a non-profit organization that was founded and is led by a current or former refugee, or a group of current and former refugees and immigrants, primarily for the advancement of refugees. The objectives of the ECSH Program are: 1) to strengthen ECBOs' provision of culturally and linguistically appropriate services to refugees within five years after their initial resettlement; 2) to support ECBOs' organizational development and engagement in capacity building by encouraging their collaboration with established refugee service providers and mainstream organizations; and 3) to support ECBOs in promoting community building and civic participation by refugee individuals and refugee community members.

The ECSH program is a competitive grant program. ORR issues a Funding Opportunity Announcement (FOA) for the ECSH program that includes a requirement that all entities funded under the FOA must adhere to the ECSH Program Implementation Guidelines, as well as the other terms and conditions of the grant.

CLIENT ELIGIBILITY

ORR-funded services under the ECSH Program are intended to benefit refugees (including asylees and other populations defined below as eligible), who have arrived in the United States within the last five years. When conducting outreach among targeted refugee ethnic communities, grantees must make it clear that **ECSH Program services are intended for newly- and arriving refugees and that individuals must show their admission into the U.S./grant of status occurred within the last five years of their enrollment.** Naturalized U.S. citizens who entered as refugees are not eligible for ORR-funded services.

To ensure eligibility, grantees must require all clients to provide documentary proof of one of the statuses included in the list.

Individuals with the following statuses are eligible for Refugee Resettlement Program benefits (see 45 CFR § 400.43(a) (1)-(6) or statutory provisions cited below):

1. Individuals paroled as refugees or asylees under § 212(d)(5) of the Immigration and Nationality Act (INA).
2. Refugees admitted under § 207 of the INA.
3. Asylees whose status was granted under § 208 of the INA.
4. Cuban and Haitian Entrants, in accordance with the requirements in 45 CFR § 401.2
 - a. Any individual granted parole status as a Cuban/Haitian Entrant (Status Pending) or granted any other special status subsequently established under the immigration laws for nationals of

¹ ORR defines an ECBO as a non-profit organization whose board of directors is comprised of at least 60 percent current and/or former refugees.

Cuba or Haiti, regardless of the status of the individual at the time assistance or services are provided;

- b. A national of Cuba or Haiti, who was paroled into the U.S. and has not acquired any other status under the INA, and with respect to whom a final, non-appealable, and legally enforceable order of removal, deportation, or exclusion has not been entered;
 - c. A national of Cuba or Haiti, who is the subject of removal, deportation, or exclusion proceedings under the INA, and with respect to whom a final, non-appealable, and legally enforceable order of removal, deportation, or exclusion has not been entered;
 - d. A national of Cuba or Haiti, who has an application for asylum pending with the Department of Homeland Security/U.S. Citizenship and Immigration Services or Department of Justice/ Executive Office for Immigration Review, and with respect to whom a final, non-appealable, and legally enforceable order of removal, deportation or exclusion has not been entered.
5. Lawful permanent residents, provided the individuals previously held one of the statuses identified above. (Note that this does not refer to Amerasians who are admitted as lawful permanent residents. See #6 below.)
 6. Certain Amerasians from Vietnam who are admitted to the U.S. as immigrants pursuant to § 584 of the Foreign Operations, Export Financing, and Related Programs Appropriations Act, 1988 (as contained in § 101(e) of Public Law (Pub.L.) 100-202), as amended (8 U.S.C. § 1101 note).
 7. Iraqi and Afghan Special Immigrants per section 1244(g) of Div. A of Pub. L. 110-181, as amended (8 U.S.C. § 1157 note) and section 602(b) (8) of Div. F of Pub. L. 118-8, as amended (8 U.S.C. § 1101 note).
 8. Victims of a severe form of trafficking in persons per the Victims of Trafficking and Violence Protection Act of 2000, Pub. L. No. 106-386, as amended, 22 U.S.C. § 7105(b) (1) (A) and (C).

Detailed information on eligibility of ORR-funded projects is available at 45 § CFR 400.32 and ORR Policy Letter 16-01 which can be found on the ORR website at: www.acf.hhs.gov/programs/orr/resource/policy-letters.

For convenience, all eligible clients will be referred to as "refugees" in this document, unless the context indicates otherwise.

ORR assistance and services must be provided to refugees without regard to race, religion, nationality, sex, or political opinion.

COORDINATING WITH STATE REFUGEE COORDINATORS & RESETTLEMENT AGENCIES

Grantees are required to coordinate services with the State Refugee Coordinator (SRC), or the individual responsible for the statewide or regional coordination of the refugee resettlement program, as applicable, of the state where the proposed project will be implemented. The goal of this coordination is to facilitate an exchange of information between the grantee and SRC in order to enhance the provision of services to eligible refugees in the area. Grantees must also coordinate referrals between their organization, the SRC, and local resettlement agencies, primarily to ensure that services are not duplicated, such as employment services.

Contact information for SRCs, or the individuals responsible for the statewide or regional coordination of

the refugee resettlement program, is available on ORR's website².

PROGRAM ORIENTATION

Grantees should provide clients with a simple but comprehensive orientation about its ORR-funded ECSH project, stressing the interconnectedness between ORR, state agencies, and local service providers, such as themselves. This type of orientation helps provide a context for the program and other ORR-funded services, facilitating the dissemination of information to refugees regarding the distinctive roles of resettlement agencies and ECBOs. As such, grantees should stress the objectives of the ECSH Program, which should differ from program services offered by resettlement agencies.

CULTURALLY AND LINGUISTICALLY APPROPRIATE SERVICES

Grantees must provide services in a manner that is compatible with a client's linguistic and cultural background. In particular, grantees must ensure that language assistance is provided to Limited English Proficiency (LEP) clients in accordance with Title VI.³ Grantees must provide LEP clients with translations of documents in the client's native language, *to the extent possible*, which the client can sign to show full understanding of the form's content. Oral translations are permitted if the client is not literate in his/her own language. A statement attesting to the translation should be included in the case documentation. If the client does not need the agreement to be translated, that should also be mentioned on the signed form.

ALLOWABLE ACTIVITIES

This section lists some common allowable activities under the ECSH Program, along with recommended practices regarding implementation. Grantees must start providing services to eligible refugees as soon as possible in the first year of implementation.

Employment Services

For activities around employment services, grantees should show that enrolled clients are receiving appropriate services, which may include professional training, English Language Training (ELT), and recertification programs, as needed. The level of employment services received by each client should reflect his/her skills, needs, and barriers.

English Language Training (ELT)

For activities around ELT, grantees should document when a client is enrolled in an ELT program and at what competency level. Case documentation should include details regarding the provider, duration of attendance, and course of study. ELT classes should be taught by trained instructors, even if they are volunteers, and must be provided without cost to the client.

Outreach to Receiving Community and Resource Dissemination

For activities around outreach to and education of the receiving community about incoming refugee groups, grantees should maintain a list of organizations contacted and events conducted. To avoid spending federal funds to produce existing information about refugee groups, grantees should prioritize the use of ORR-funded technical assistance (TA) materials relating to refugee issues.⁴

² <http://www.acf.hhs.gov/orr/resource/orr-funded-programs-key-contacts>

³ For more information on this, see ORR Policy Letter 00-18: <http://www.acf.hhs.gov/programs/orr/resource/state-letter-00-18>.

⁴ For more information on ORR's TA provider, visit: <https://switchboardta.org>.

Resource Production and Dissemination

For activities around the development of locally or culturally specific orientation materials for refugee communities (such as a driver's manual in Nepali for Bhutanese refugees, health awareness flyers in Kirundi, or a financial literacy booklet in Somali), grantees must not only disseminate that information to the targeted community, but should also share those ORR-funded resources with ORR for dissemination among all program grantees. Resources developed with ORR funds belong to ORR and the funded agency. ORR has total freedom to use these resources as it sees fit.

Grantees should be aware of Federal appropriations law that requires that when issuing statements, press releases, requests for proposals, bid solicitations and other documents describing projects or programs funded in whole or in part with Federal money, grantees must clearly state: (1) the percentage of the total costs of the program or project which will be financed with Federal money; (2) the dollar amount of Federal funds for the project or program; and (3) percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.⁵

CASE DOCUMENTATION

For accurate tracking of services and outcomes, grantees are required to maintain documentation on each client enrolled in the ECSH Program. This should include:

- **Eligibility and Intake Information:** Intake information must include the client's name; date of birth; current address; date of enrollment into the ECSH program; and verification of eligibility for ECSH services, which consists of 1) immigration status under which eligibility is claimed (i.e., refugee, asylee, etc.), and 2) date of eligibility (i.e., date of arrival in qualifying status, date of grant of qualifying status, etc.). The following documents are acceptable proof of refugee status during client intake and service eligibility interviews: I-94 showing admission into the U.S. as a refugee; a United States Permanent Resident Card (USCIS Form I-1551) also known as a green card; and an Asylum Grant Letter.⁶
- **Individualized Service Plan:** This can be included as part of the Intake form. Grantees must develop a plan that details the activities and resources needed to assist the client in meeting his/her needs (as determined through the intake and assessment process). The plan must include what services (including referrals) will be provided to the client. For example, if a client is enrolled in a training program and the client requires a referral to a bus orientation class in order to successfully attend and complete the training program, the plan must include information about both referrals. The individualized service plan serves as a map, and an agreement, that both staff and the client follow while the client is enrolled in the ECSH program. The plan must be updated as needed.
- **Case Notes:** Case notes function as a concise record of contact that the grantee has with each client, and helps monitor a client's progress over time. Grantees must document the services they provide to clients by making notes of their interactions (in-person meetings, phone calls, etc.) and should

⁵ For more information on this, see section 505 of the FY 2016 appropriations law, Pub. L. 114-113.

⁶ For more information on status and documentation requirements for the ORR Refugee Resettlement Program, see ORR Policy Letter 16-01: <http://www.acf.hhs.gov/programs/orr/resource/status-and-documentation-requirements-for-the-orr-refugee-resettlement-program>.

include who initiated the interaction, the reason for it, the type of assistance provided, follow-up activities and outcomes. Additionally, any provision of resources that goes directly to the client should also be noted, along with the client's acknowledgement of receipt of those resources (bus passes, stipends, etc., that are part of the grantee's approved budget).

- Translations of Forms in Client's Primary Language, to the extent possible: See the section titled *Culturally and Linguistically Appropriate Services* on page 3 for requirements around this.
- Safeguarding Personally Identifiable Information (PII): PII is information that can be used to distinguish or trace an individual's identity, such as a person's name and date of birth. Programs must ensure compliance with 45 CFR § 75.303 (e) to take reasonable measures to safeguard protected PII of program participants. According to the Department of Health and Human Services' (HHS) Personally Identifiable Information (PII) Breach Response Team (BRT) Policy⁷, a breach of PII shall be reported within one hour of discovery. Grantees should contact their Program Office within one hour of discovery. For more information on PII, grantees should review ORR's Policy Letter 17-02⁸. *Please note*: ORR does not require grantees to obtain clients' Social Security numbers (SSN) as part of the ECSH Program. Grantees are strongly advised against maintaining clients' SSNs in order to limit the amount of PII that requires safeguarding.

Recommended Case File Forms

In terms of forms around service provision, it is recommended to create and maintain the following case file forms (some grantee organizations may already have similar forms that are used throughout their organization):

- Consent for Services: This form outlines the services the grantee offers, along with a client's rights and responsibilities while receiving services from the grantee. By signing this form, a client agrees to receive services from the grantee and understands his/her rights and responsibilities.
- Confidentiality Agreement: This form is an agreement in which the grantee pledges not to disclose a client's information to a third party. By signing this form, the client acknowledges that the grantee will keep his/her information secure and will not share it with other entities, unless the client gives permission. Grantees must be aware of state laws around mandatory reporting, in which they are required to report specific information to the appropriate authorities, for example, in the case of suspected child abuse and neglect.
- Release of Information: With this form, and by signing it, a client provides permission to the grantee to share his/her information with a third party. The name of the entity/entities (i.e. clinic, etc.) should be included on the form before the client signs. Release forms should also be used when grantees want to share a client's success story or image for promotional purposes.

⁷ <https://www.hhs.gov/about/agencies/asa/ocio/cybersecurity/pii-breach-response-team-policy/index.html>

⁸ <https://www.acf.hhs.gov/orr/resource/data-sharing>. The letter references the Office of Management and Budget's (OMB) M-17-12: *Preparing for and Responding to a Breach of Personally Identifiable Information*: https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2017/m-17-12_0.pdf.

All documents that grantees ask clients to sign must take into consideration LEP clients. Please see the section titled *Culturally and Linguistically Appropriate Services* on page 3 for requirements around this.

Case Documentation Maintenance

To maintain consistency of case documentation, grantees should develop a client list, a checklist for all case files, and a summary sheet showing the types of assistance provided. Project managers/coordinators should ensure that all files have the same documents in the same order for ease of monitoring and reference by staff. In order to ensure consistency, a best practice is to establish regular (i.e., monthly, bi-monthly, quarterly) file reviews and to record the results of the review on a checklist attached to the cover of each file.

Storage of Program Documents

To ensure confidentiality and privacy of client information, grantees must store case documentation and data in locked facilities or on computers/systems with restricted access (password-protected), as applicable. Additionally, since many grantee agencies serve both refugee and immigrant populations, grantees must store documents relevant to the ORR-funded ECSH Program in a separate location so as to prevent the inclusion of unrelated outcomes when reporting to ORR.

REPORTING⁹

In accordance with HHS Grants policy¹⁰, grantees of this program must submit a narrative report called the Performance Progress Report (PPR). In this report, grantees provide updates to ORR on major accomplishments, goals, outcomes achieved, challenges, etc. The blank copy of the PPR is available on ACF's Discretionary Post-Award Requirements webpage.¹¹ As part of the PPR, grantees must also submit the ECSH Data Indicators. A blank copy of this form is provided to grantees by ORR¹² and is submitted at the same time as the PPR. Additionally, ORR is interested in learning about grantees' participation in local community coordination convenings and their engagement and service coordination with SRCs.

Reporting Due Dates

- The first semi-annual PPR and ECSH Data Indicators are due April 30 of each year and covers activities conducted during the first-half of a budget period, which ends on March 31.
- The second semi-annual PPR and ECSH Data Indicators are due October 30 of each year and covers activities conducted during the second-half of a budget period, which ends on September 29.
- A final project report (PPR only) is due 90 days after the completion of the entire three-year project (see the section titled *Final End-of-Project Reports* on page 7 for more information).

⁹ For more information on reporting requirements, reporting forms, etc., see the award package included with the Notice of Award in Grant Solutions.

¹⁰ HHS Grants Policy Statement, Progress Reporting 11-84: <https://www.hhs.gov/sites/default/files/grants/grants/policies-regulations/hhsgps107.pdf>. Performance reports are also referred to in 45 CFR 75.342(b).

¹¹ SF-PPR ACF Performance Progress Report: <https://www.acf.hhs.gov/discretionary-post-award-requirements#chapter-2>.

¹² The Program Officer uploads a copy the ECSH Data Indicators to each grantee's GrantSolutions account as a Grant Note, so it can be accessed by the grantee at any time.

****The PPR and ECSH Data Indicators must be submitted in GrantSolutions as a Grant Note.****

Please note: Grantees are required to submit financial reports on a quarterly basis in Payment Management System (PMS)¹³. For more information on financial reporting requirements, grantees should refer to the award package included with their Notice of Award (NoA).

PPR Tips

The top four qualities desired in a semi-annual report have to do with content. A good report is:

1. Complete in that it discusses all aspects of the grant project that were to be covered in the reporting period, with a focus on providing updates on outputs of proposed objectives¹⁴;
2. Concrete in that it offers qualitative and quantitative evidence to back up claims about clients served, services provided, attendance, impact, and outcomes;
3. Concise in that it provides information on main accomplishments, outcomes, challenges, etc. without the lengthy inclusion of nonessential details; and
4. Clear in that it reports the “who,” “what,” “where,” “when,” “why,” and “how” of project activities.

Some welcome report attachments include:

- A chart outlining what was expected/scheduled during the reporting period and what was achieved
- Photographs
- Press coverage
- Examples of documents produced during a project (informational flyers, handbooks, etc.)

Some Do's:

- Meet the submission deadline. If there is a reason for a delay, call or email in advance.
- Include the PPR Cover Page.
- Insert page numbers and use a header to identify the organization and grant number when submitting supplemental material with the PPR.

Some Don'ts:

- Do not include non-eligible clients in project outcomes.
- Do not include clients served through different funding streams to demonstrate project outcomes.

Final End-of-Project Reports

At the end of the three-year project period, grantees are required to submit a final PPR, along with final financial documents. These reports should **cover the entire three-year project period** and are submitted in addition to the grantee's last semi-annual reports. **Grantees will use the same PPR form for both final and semi-annual reports.** End-of-project reports are due within 90 days after the

¹³ Payment Management System: <https://pms.psc.gov>

¹⁴ A grantee should refer to the goals, activities, and outputs included in its logic model that was submitted to ORR in its grant application. For example, if the grantee stated in its logic model that it would provide after-school tutoring to 30 youth each year, then the semi-annual report should include how many youth the grantee was able to provide this service to in the past six months of the reporting period.

completion of the project.

Similar to the semi-annual reports, the final PPR must highlight major accomplishments, problems or challenges, how those challenges were addressed, and if there were any important lessons learned, significant dissemination activities, major collaborations, coalitions, and resources developed. Most importantly, the final PPR should include an update on the cumulative three-year outputs and outcomes of the project against what was originally proposed.

NON-COMPETING CONTINUATION PROPOSAL

Twice during the three-year project period, ORR will invite grantees to submit a Non-Competing Continuation (NCC) application for the continuation of funding for the second and third budget periods of the ECSH Program grant (or Year 2 and Year 3 of the project). The most important feature to remember when preparing a proposal for continued funding of ORR-funded projects is the original goal of the project as stated in the grant application and whether it has changed. Grantees should plan the coming year's activities in light of the previous year's activities and accomplishments and what remains to be done. Generally, the NCC application will be shorter in length than the original proposal since the requirements are more concise. The official ORR invitation to apply for continued funding contains guidance as to the forms required for submission.

NCC Application Tips

2nd year grantees: For grantees entering the second year of their respective projects, it might be useful to assess the progress to date of the project and whether project activities need to be modified slightly given the unanticipated challenges (or successes) of the first year. Although most original proposals contain a timeline of the various objectives and activities of the entire project, they tend to elaborate mostly on the first year and to mention only briefly what will be done in later years. Accordingly, it is important to give a brief overview of project goals and objectives, offer a situational snapshot of what has been accomplished in the first year, and provide a table listing the activities to be undertaken, the entities performing those activities, and the timeline of those activities during the second year. The continuation proposal must contain details of any new partner agencies and the loss or acquisition of key project staff. In addition to the narrative, applicants must submit a detailed budget along with a budget justification of expenditures for the program year.

3rd year grantees: Grantees entering the final, third year of their projects should focus on evaluating the success of the project in meeting the goals outlined in their original grant proposal. In addition to listing remaining objectives and final year project activities, grantees should have a good sense of the efficacy and impact of their project by the third year and how the project will be concluded. Engaging in a monitoring and evaluation activity is particularly appropriate to objectively assess the efficacy of the grantee's ECSH project.