

Office of Refugee Resettlement (ORR)
Ethnic Community Self-Help (ECSH) Program
Program Implementation Guidelines FY 2016-2019

This document is referenced in the FY 2016 ECSH Program Funding Opportunity Announcement (FOA) (in Section 1. Program Description, Post-Award Requirements) and serves to supplement information contained in the FOA. The FOA (HHS-2016-ACF-ORR-RE-1129) is available at: http://www.acf.hhs.gov/grants/open/foa/files/HHS-2016-ACF-ORR-RE-1129_1.pdf.

PROGRAM OVERVIEW

The goal of the ECSH Program is to support Ethnic Community-Based Organizations (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. Under the FY 2016 ECSH Program FOA, ORR defines an ECBO as a non-profit organization whose board of directors is composed of at least 60 percent current and/or former refugees.

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 limited to recently arrived refugees who have phased out of the typical Refugee and Cuban & Haitian Entrant Reception and Placement (R&P) programs.**¹ Clients will accordingly be eligible for ECSH Program services after Day 90 and before the end of Year 5 of resettlement. Clients who phase out of R&P programs before Day 90 are eligible for ECSH Program services at that time. This criterion ensures that ECSH Program services *complement* instead of duplicate services available to refugees from resettlement agencies. 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 below as a condition of eligibility.

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.

¹ Refugee and Cuban & Haitian Entrant Reception and Placement (R&P) programs are implemented by voluntary agencies under agreements with the Department of State and Department of Homeland Security.

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 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/United States 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).

In addition to unaccompanied minors in the above categories, the following are eligible for the ORR Unaccompanied Refugee Minors Program:

9. Unaccompanied Minor with Special Immigrant Juvenile Status under 8 U.S.C. § 1101(a)(27)(J), who was in the custody of the Secretary of Health and Human Services at the time the dependency order was granted for such child or was receiving services pursuant to section 501(a) of the Refugee Education Assistance Act of 1980 (8 U.S.C. § 1522 note) at the time such dependency order was granted.
10. Unaccompanied Minor who has been granted U status per section 101(a)(15)(U) of the INA (8 U.S.C. § 1101(a)(15)(U)).

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.

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 differ from R&P program services offered by voluntary 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.² 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 as referenced in *Section I. Program Description* of the FY 2016 FOA, along with best practices regarding 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 as a Second Language (ESL)

For activities around ESL instruction, or other ELT programs, 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 TA materials relating to refugee issues.³

² For more information on this, see ORR Policy Letter 00-18 on ORR's website at: <http://www.acf.hhs.gov/programs/orr/resource/state-letter-00-18>.

³ For more information on ORR's TA providers, visit ORR's website at: <http://www.acf.hhs.gov/programs/orr/resource/technical-assistance-providers-1>.

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.⁴

CASE DOCUMENTATION

For accurate tracking of services and outcomes, grantees must 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, status under which the client arrived in the U.S., date of eligibility, date of enrollment, date of projected Program service termination, documentation of eligibility for ECSH services, alien number, birth date, and current address. 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-551) also known as a green card; Asylum Grant Letter.⁵
- Documenting Service Provision: Grantees should document interactions with clients noting who initiated the interaction, the reason for it, the type of assistance provided, and both subsequent remedial actions and outcomes. This includes documenting the provision of any resources directly to the client and the client's acknowledgement of receipt of those resources (stipend, etc., if part of the approved proposal).
- Translations of Forms in Client's Primary Language: See the section titled *Culturally and Linguistically Appropriate Services* on page 3 for requirements around this.

In terms of forms around service provision, it is a best practice 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.

⁴ For more information on this, see section 505 of the FY 2016 appropriations law, Pub. L. 114-113.

⁵ For more information on status and documentation requirements for the ORR Refugee Resettlement Program, see ORR Policy Letter 16-01 on ORR's website at: <http://www.acf.hhs.gov/programs/orr/resource/status-and-documentation-requirements-for-the-orr-refugee-resettlement-program>.

- **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.
- **Action Plan:** This can be included as part of the Intake form. The Action Plan outlines all the services the grantee is planning to provide a client based upon his/her needs, and in accordance with approved project activities. For example, if a client is enrolled in a training program, the date, type, intended duration, expected outcomes, and provider of the training program can be included. Along with this, the Action Plan can include referrals to a bus orientation class if the client requires this service in order to successfully attend and complete the training program.
- **Case Note Log:** This form is where staff can concisely record contact with, and monitor progress of, a client over time with summary notes regarding the purpose and outcomes of each contact.

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) 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.

REPORTING ⁶

In accordance with HHS Grants policy⁷, grantees of this program must submit a narrative report, the Performance Project Report or PPR (listing major accomplishments, outcomes against objectives, challenges, etc.) twice a year (semi-annually). (For financial reporting requirements, grantees should refer to their Notice of Award and award package in Grant Solutions.).

- The first semi-annual PPR is due April 30 of each year and covers activities conducted during the first-half of a budget period, which ends on March 31.

⁶ For more information on reporting requirements, reporting forms, etc., see the award package included with the Notice of Award in Grant Solutions.

⁷ HHS Grants Policy Statement: <http://www.hhs.gov/asfr/ogapa/aboutog/hhsgps107.pdf>.

- The second semi-annual PPR is 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 is due 90 days after the completion of the entire three-year project (see the section titled *Final End-of-Project Reports* on page 6 for more information).

All reports must be submitted through Grant Solutions.

Performance Progress Reporting Tips

The top 4 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 objectives;
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.**

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 salient lessons learned, significant dissemination activities, major collaborations, coalitions and resources developed. Most importantly, the final PPR should include an update on the cumulative 3-year outputs and outcomes of the project against what was originally proposed.

End-of-project reports are due within 90 days after the completion of the project. For example, the final report for a project ending on September 29, 2019 must be received by December 31, 2019.

NON-COMPETING CONTINUATION PROPORSAL

Twice during the 3-year project period, ORR will invite grantees to submit a Non-Competing Continuation 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 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.

Non-Competing Continuation 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. Totally new activities may not be proposed. 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. The official ORR invitation to apply for continued funding contains guidance as to forms required for submission.

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 so that both the grantee and ORR can objectively assess the efficacy of program design and determine whether the project can and should be continued, and whether the model should be replicated through other projects.

CONTACT

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