



MEMORANDUM

Date: December 12, 2019

To: The Honorable Chairman and Members
Pima County Board of Supervisors

From: C.H. Huckelberry
County Administrator 

Re: **Emergency Food and Shelter National Board Program Listening Session at the Pima County Housing Center**

With coordination from Senator Krysten Sinema's Office, the Emergency Food and Shelter National Board Program (EFSP National Board) held a Listening Session at the Pima County Housing Center on Wednesday, December 11, 2019. In July 2019, Congress selected the public/private EFSP National Board process to disburse \$30 million in Supplemental Appropriation Humanitarian Assistance (SAHA) through competitive grants. This Board makes final award determinations for FEMA under the SAHA program, to nonprofits or government agencies that deliver direct services to southern border migrants released from DHS custody.

The Listening Session was to provide the EFSP National Board with community input on the SAHA application and award process. It was also to provide a venue for the input of the nonprofit, faith-based and local governmental entities that have been pressed to respond to the humanitarian challenges created by changes in federal asylum policy and its implementation by the US Border Patrol and Immigration and Customs Enforcement.

Forty-five individuals representing primarily non-governmental organizations (NGOs) and faith-based organizations, many from the Phoenix metropolitan area, attended the Listening Session. Our concerns are documented in the attached communication delivered to the EFSP National Board and were conveyed orally at the meeting. It is clear our concerns are reflected as the same concerns of almost all NGOs and faith-based communities, particularly, the lack of coherent, consistent and reasonable response by the Federal Emergency Management Agency in administering this program.

The southern border counties, especially in Arizona, New Mexico and to a lesser extent California, are grossly underrepresented to date in the current federal funding for this crisis. For example, the State of Maine--in particular, the County of Cumberland, received nearly \$900,000 for dealing with a small number of asylum seekers (200 to 400 individuals) from January 1 to June 30, 2019. During the same six month period, Pima County was overwhelmed by 18,465 asylum seekers requiring the significant mobilization of faith-

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based/NGOs and local government resources to meet the documented surge of asylum seekers. For this volume of asylum seekers, Pima County government and local partner agencies, have received a total of \$138,363.60, only one-sixth of the revenues received by Maine. Something is seriously inequitable with this program. We hope the Listening Session will help resolve these gross inequities and I am hopeful our Congressional Delegation, including our Senators will recognize the inequity in the matter for Arizona's taxpayers.

CHH/anc

Attachment

c: Jan Leshar, Chief Deputy County Administrator
Dr. Francisco García, MD, MPH, Deputy County Administrator & Chief Medical Officer,
Health and Community Services
Regina Kelly, Director, Grants Management and Innovation Office



COUNTY ADMINISTRATOR'S OFFICE

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C.H. HUCKELBERRY
County Administrator

December 11, 2019

Emergency Food and Shelter National Board Program
701 N. Fairfax Street
Alexandria, Virginia 22314-2045

**Re: Listening Session in Pima County, Arizona at the Pima County Housing Center on
Wednesday, December 11, 2019**

Dear EFSP National Board:

Welcome to Pima County. I am very pleased you have taken time out of your schedule to learn about our asylum seeker/humanitarian aid protocols, which are a cooperative effort between the local government of Pima County, and a number of non-governmental organizations (NGOs) that have been involved for many years in emergency shelter operations and other humanitarian aid activities.

These NGOs deserve appreciation, respect and financial support in carrying out activities that they are uniquely qualified to perform. Faith-based (Catholic, Presbyterian, Methodist) communities and their NGOs have shouldered most of the responsibility for supporting migrants in Pima County.

Being in local government for over 40 years and interfacing with numerous federal agencies and programs, I am painfully aware of the difficulty in starting up new programs, essentially from scratch. I firmly believe that your Listening Session will result in significant process improvements that will allocate resources more efficiently and effectively to areas of documented and verifiable need based on facts and data.

My areas of greatest concern are as follows:

Recognition of Humanitarian Aid Financial Obligation is Welcomed as These Activities Have
Been Provided by NGOs for many years

In the case of Tucson and Pima County, the humanitarian aid offered through supplemental appropriations for humanitarian assistance is years late. Our NGOs, primarily Catholic

Community Services, have been providing humanitarian aid services since July 2014, serving approximately 30,000 individuals since that time. Since January 2019, more than 18,420 asylum seekers were released to community agencies for assistance and support. (Attachment 1) The critical period for humanitarian aid occurred in spring 2019, when the asylum seeker surge reached a peak, requiring local governments, in the case of Tucson and Pima County, to stand up temporary shelters. Because of the continual services provided by NGOs, their resource base has been nearly exhausted both financially, as well as their volunteer base. Some retroactive aid compensation should be made available to NGOs that have provided these services for a number of years.

Border Protection Policies of the Department of Homeland Security Change so Rapidly that Asylum Seeker/Humanitarian Aid Requirements are Highly Variable

The present policy of the Department of Homeland Security specifically the migrant protection protocols, also known as return to Mexico, is leading to very unstable future asylum seeker humanitarian aid needs. The flow of asylum seekers released from either the Border Patrol or Immigrations and Customs Enforcement varies substantially. In the last six months, the average weekly number of asylum seekers released for NGO processing has varied greatly from 100 to 790 per week. Because of these extremely variable asylum seeker humanitarian aid workloads, NGOs in shelters are required to reserve excess shelter capacity and incur fixed costs regardless of the variability of asylum seeker releases.

The Present Emergency Food and Shelter National Program Does Not Appear to be Well Integrated into Established Emergency Management Networks

The entire local emergency response system generally focused on coordination through local offices of emergency management at the city, county or state level. It is these entities that act as the coordinating focal point of activity for humanitarian aid and/or the standup of emergency shelters. Based on the present process, they appear to have been entirely excluded from, or cut out of, the communications system causing a significant information gap with local governments who respond to such issues. Local governments and their offices of emergency management who coordinate the support activities with NGOs, local offices of emergency management should be included in the coordination and information process for assistance from the emergency food and shelter program.

Cost Reimbursement Eligibility Discounts Local Government Participation and the Necessary Startup, Repair and Maintenance Cost for Repurposing Public Facilities to Provide Emergency Sheltering Activities as well as All Operating Expenses

The adaptive reuse of a former juvenile detention facility to a humanitarian aid shelter required extensive actions by the County that included, installation of shade structures over the exercise area over three pods; carpeting for the common areas; plumbing system rehabilitation; disconnection of the central security system and locks; removing locked doors; installing three new doorways through formerly secure concrete walls; additional electrical modifications in medical storage facilities; electric modifications of all detention units to

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eliminate centralized switching to individual switching; repainting the facility; access site work to create turnaround areas for Department of Homeland Security and US Border Patrol bus vehicles, and numerous other modifications all undertaken by the County to repurpose the detention facility to a humanitarian aid shelter. The same has been the case for faith-based organizations, that have had to incur significant facility remodeling and related costs as they adapt current assets for sheltering and logistics. These costs are real, and must be shared by the federal government through some appropriate funding mechanism.

Cost reimbursement eligibility must include, shelter services, food, transportation and building renewal/renovation costs as well as costs associated with medical clearance, medical supplies and vaccines, specifically the flu vaccine. Direct reimbursement needs to occur to local public health agencies who incur the cost of providing medical supplies, medicines, protective equipment and vaccines, to NGOs for the purpose of conducting initial medical screening of all asylum seekers.

Emergency Food and Shelter Funding Allocations Need to be Made in Proportion to Actual Documented Demands

The first round of Supplemental Appropriations for Humanitarian Assistance (SAHA) Funding awards announced by the EFSP National Board included some baffling information. For example, nonprofit and government entities in Cumberland County, Maine received SAHA grant awards totaling \$892,586.90. In contrast, the nonprofit and government entities of Arizona's Pima County only received first-round grants totaling \$138,363.60. For every \$1 dollar Pima County received, Cumberland County received \$6.45. The discrepancy is even more troubling when considering the related discrepancy of migrants served during the grant period (i.e., January 1 – June 30, 2019). According to national and local press coverage, Cumberland County nonprofit and government entities served somewhere between 200 and 450 asylum-seeking migrants. Pima County, during the same period, served 18,465 migrants. Therefore, while Pima County served 4,103 percent more asylum-seeking migrants than Cumberland County, Cumberland received 6.45 times more SAHA award dollars. Is it possible that Cumberland County received an advance for current and future periods in addition to reimbursement of costs incurred during the grant period of January 1 to June 30, 2019?

I have asked Deputy County Administrator Dr. Francisco Garcia to brief you on the current status of our activities and our cooperative venture with Catholic Community Services at Casa Alitas. Casa Alitas is an emergency shelter providing shelter, food, medical clearance, medical support, food preparation and laundry services to asylum seekers in their transition from release by either the US Border Patrol or Immigration and Customs Enforcement to their community sponsors in the United States. While these activities are conducted at a County facility, the facility is entirely operated by Catholic Community Services who provides all services, including the transportation coordination and logistics necessary to transition asylum seekers from this temporary shelter to their sponsor.

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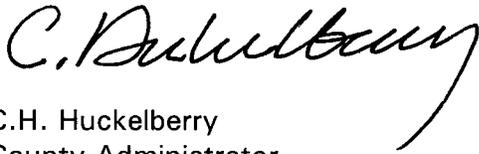
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Dr. Garcia will also discuss with you the highly variable demands that have been accommodated by this facility and, it should be noted, this public facility was a former juvenile detention facility built in the 1990s and has not held a juvenile for over 10 years before its conversion to Casa Alitas. Pima County incurred significant startup costs in making this facility available and usable as a community shelter.

Our Grants Management and Innovation Department Director, Regina Kelly, will also discuss specific issues related to the grant process and the mechanics of submission, evaluation and award. (Attachment 2)

We very much appreciate your spending time in Tucson and Pima County at the Housing Center and hope you visit the Casa Alitas facility at the former Juvenile Detention Complex.

Sincerely,



C.H. Huckelberry
County Administrator

CHH/anc

Enclosures

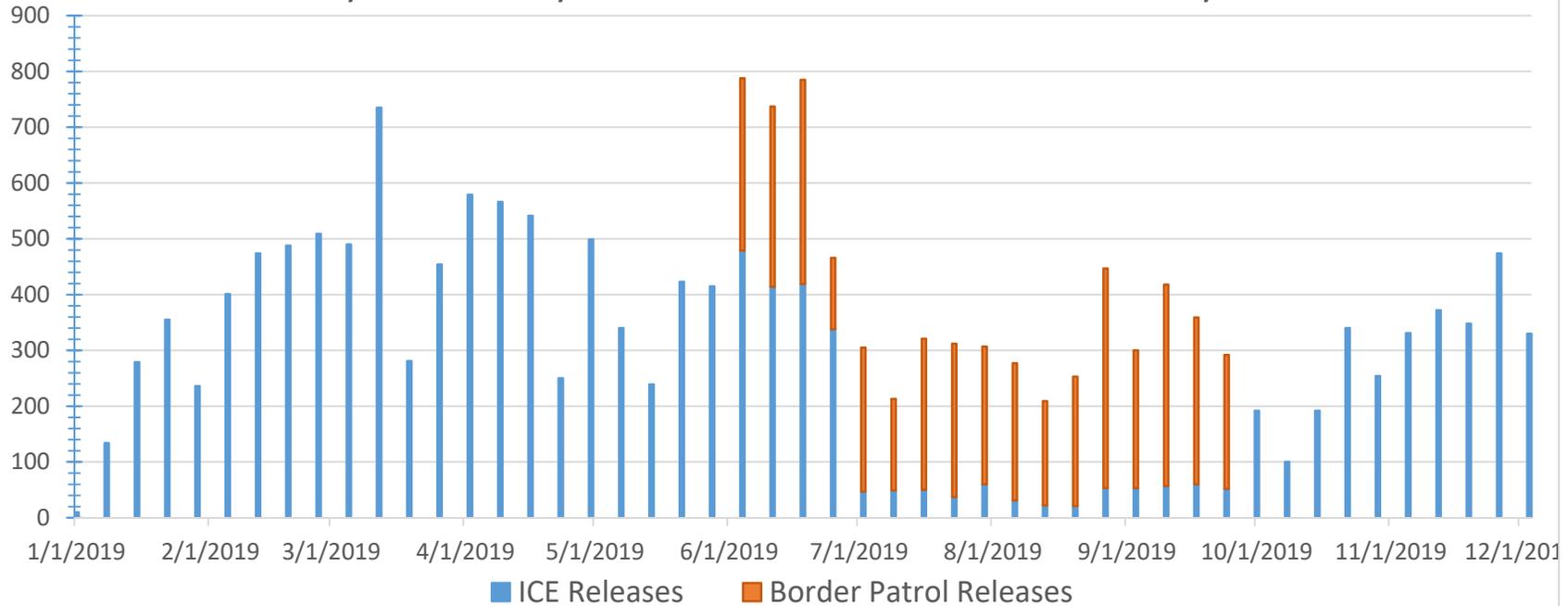
c: Jan Leshar, Chief Deputy County Administrator
Dr. Francisco García, MD, MPH, Deputy County Administrator & Chief Medical
Officer, Health and Community Services
Regina Kelly, Director, Grants Management and Innovation Department

ATTACHMENT 1

Summary of Asylum Seeker Releases in Pima County 2019

Total Release by ICE in 2019	13873
Total Release by Border Patrol in 2019	4547
Total Releases in 2019	18420

Weekly Releases by ICE and Border Patrol in Pima County 2019



Summary of Releases to Local Area Shelters in Pima County 2019

ICE Casa Alitas	ICE FUMC	ICE Merilac	ICE St. Pius	Local Area Release	ICE St. Marks Presbyterian	ICE Benedictine Monastery	ICE UCC Church Rincon	ICE St. Francis UMC	BP Casa Alitas PCJCC	BP Benedictine Monastery
2033	4836	157	30	21	61	5574	1014	147	2206	2341

ATTACHMENT 2

Date: December 10, 2019

To: EFSP National Board

From: Regina Kelly, Director 
Grants Management & Innovation

Via: C.H. Huckelberry 
Pima County Administrator

Re: **Pima County Responses to Emergency Food and Shelter Program National Board Questions**

How Could the Application Process be Improved? Were the questions or requirements confusing?

The process was quite confusing—especially at first—and resulted in some wasted effort.

On July 2, 2019, the Emergency Food and Shelter Program (EFSP) National Board staff in Alexandria, VA, e-mailed a Preliminary Notice Regarding Supplemental notice to our EFSP Local Board staff here in Pima County stating that the State Set-Aside Committee (SSA) would be required to submit a request for funding for all local agencies in the state. The notice indicated that the assistance was available to reimburse expenditures from January 1, 2019 through September 30, 2020. No other period of performance was provided. A survey was then issued by the Arizona SSA to EFSP Local Boards throughout the state. The survey exercise focused on agencies that receive funding every year from traditional (as opposed to the Supplemental) EFSP funding--but many of the organizations here in the Pima County jurisdiction were not part of the humanitarian efforts in response to the influx of asylum-seekers across the southern border, especially over the last year. Conversely, many of the organizations that *were* part of this year's humanitarian response were not established EFSP Local Recipient Organizations, and it took a while to obtain confirmation that non-LROs were eligible to apply and to obtain additional guidance about how to establish a new LRO in the electronic EFSP system.

The informal survey of LROs conducted by the Local Board was followed by an online survey conducted by the SSA, to be submitted by interested LROs by July 15, 2019. Additionally, the grant period changed to a considerably shorter window, from January 1 to June 30, 2019, which accordingly limited expenditure reimbursements. On a call on August 9, 2019, Arizona SSA staff stated to Pima County Grants Management & Innovation Department (GMI) staff that the electronic survey responses due July 15 would be considered the LRO's application for the first round of Supplemental Appropriations Humanitarian Assistance (SAHA) funding.

On August 23, 2019, however, a new communication from the SSA informed us that there was a new application, to be submitted by September 6, 2019 directly to United Way Worldwide for

reimbursement of expenditures from January through June 2019. But then, on September 9, 2019, we received a notice from United Way announcing that the deadline to apply had been extended until September 16.

The decision to restrict the initial process to the period from January 1 to June 30, 2019 was confusing because Congress authorized the assistance for the period from January 1, 2019 through September 30, 2020. Most federal grant proposals are written based on forecasted costs for a proposed activity, and most federal government spending has to be approved prior to obligation. However, the first round of EFSP National Board SAHA grant funding was rolled out as a retroactive reimbursement award. In this context, it is notable that the awards from this first round only amounted to a small fraction of available funding.

The guidelines for SAHA were issued by the National Board in a supplement to the previous year's EFSP annual funding. This required a lot of toggling back and forth between different sets of guidelines to determine which costs could be included in our request and which ones could not. Many common direct costs of providing humanitarian mass shelter, including—just for example—blankets and food, were not allowable.

The guidelines defined all personnel costs, including staff time to provide direct services to migrants (i.e., meal preparation, shelter intake) as Administrative costs. The guidelines stated that Administrative costs might or might not be allowable, as a decision had not yet been made about this. The decision to allow reimbursement of Administrative costs came after the initial submission deadline, in the same September 9, 2019 notice regarding the extended deadline. This, too, added to Pima County's first round grant application development and submittal.

What would have been the ideal amount of time to review applications (considering other constraints that were in place)?

The National Board reviewed the applications expeditiously.

What were the common barriers that organizations met when applying?

United Way Worldwide's Supplemental submission portal was not sufficiently robust to handle the Pima County GMI first round application. Moreover, the application was hard to read and navigate, and our password mysteriously stopped working several times, including at the moment of submission. The data capacity for uploading attachments was only 5 MGs, but the instructions said to submit detailed documentation of services and expenses.

The instructions called for invoices and check backup of every transaction, resulting in *hundreds* of pages of documentation that needed to be submitted through the portal. These could not be uploaded because of the size limits, and Pima County finally received approval from the National Board to send the 1,000+ backup documents by FedEx. These particular process glitches suggested that the

National Board's requirement of for high-detail backup documentation had not been thought through sufficiently in order for submittal operations to run smoothly.

The instructions also required a daily shelter log, with a total count of migrants served by date, by facility. This posed a challenge for shelters that were tracking each migrant's entrance and exit date from the shelter, and/or tracking length of stay for each migrant. Data had to be converted mathematically to provide the exact format specified by the National Board in the first SAHA grant round.

For local organizations and government, did you apply in Round 1 or did you consult your EFSP Local Board about submitting an application in Round 1? Did the Local Board accept your application?

Pima County is a local government that did apply in Round 1. The Local Board did accept our application.

Other categories of expenses that should be eligible for reimbursement

- Direct staff time to operate shelters should always be eligible for reimbursement.
- Blankets and food and supplies for use by migrants should always be eligible.
- Vaccinations should be a primary expense.
- Direct staff time to plan logistics, coordinate services, track services, and complete reports may be considered "administrative," but these costs should always be eligible for reimbursement. Without these activities, communities could not mobilize the necessary resources in time to prevent suffering.

For direct providers who received funding, what other expenses should have been included? Did you apply for administrative expenses in round one? If no, why?

We did apply for administrative expenses in Round 1, even though we were not sure whether administrative expenses would be allowed. The process of collecting all of the documentation for these expenses was very burdensome, with no certainty of a return on all that effort.

For indirect providers, what services did you provide? Are those services paid for by direct providers? Are there categories of expenses that should be considered eligible in the next round of funding?

Pima County was a direct provider, not an indirect provider.