

**NYS Department of State
Division of Community Services – Office for New Americans
Office for New Americans Neighborhood-based Opportunity Centers
Request for Applications #12-ONA-09**

RFA Updates/Changes

- The RFA was updated on June 26, 2012. All changes are highlighted in yellow.
- The ROMA training will now be held on July 25, 2012. See the NYS Community Action Association (NYSCAA) website at www.nyscaaonline.org for registration and details.
- Cover Page: The July 18, 2012 ROMA training has been moved to July 25, 2012. This is a live webcast and only available on this day. Anyone viewing the training must register prior to the webcast in order to participate. See the NYSCAA website for registration and details
- Page 4: Under Payment Method and Reporting Requirements the financial audit report should not have been included as a quarterly submission under number 3c
- Page 5: The prohibition on subcontracting refers to the provision of program services as outlined in the RFA. These services/activities should be provided by the agency or consortium of eligible agencies as defined within the document. The expectation is that the submitting organization or consortium has the capacity to conduct the required program activities. The fiscal agent, however, may not have the capacity to perform various functions and may need to contract out for services. That would be permissible under this RFA. For example, the audit is done by an independent auditor and payroll services are often completed outside the agency. The lead agency in a consortium is allowed to use funds through this grant to contract with other consortium members for services. Consortium partners are not considered subcontractors for purposes of this RFA.
- Page 9-10: While the use of CitizenshipWorks is generally required, an organization who can demonstrate that they have a comparable technology may be allowed to substitute their technology for CitizenshipWorks. ONA must approve this prior to execution of a contract.
- Page 9-10: The ONA Legal Counsel will review each citizenship application for legal issues **OR** coordinate with BIA accredited representatives or attorneys on staff at the ONA Opportunity Centers to review citizenship applications for legal issues. The ONA Legal Counsel and other legal reviewers should follow-up with clients as needed. After ensuring appropriate legal review, the ONA Legal Counsel should provide the citizenship application to the client. The client is responsible to send in the citizenship application.
- Page 13: Lead applicants must reside in one of the counties
- Page 19: Eligible program participants include non-citizens of the United States residing anywhere within New York State who have attained 16 years of age and are not enrolled or not required to be enrolled in secondary school under NYS law. Eligibility for deferred action process services is restricted to individuals of the ages specified for the deferred action process by the U.S. Department of Homeland Security.
- Page 21: Section VIII, Evaluating the Application, under Application Information, number 2, should be worded as “eligible applicants are a CAA, CBO **OR** other not-for-profit organization with 501 (c) (3) IRS status”

Questions & Answers

The responses to questions included herein are the official responses by the State to questions submitted by potential applicants and are hereby incorporated into RFA # 12-ONA-09 issued on June 22, 2012. In the event of any conflict between the RFA and these responses, the requirements or information contained in these responses will prevail.

SERVICE DELIVERY

Q1: What is the percentage of persons to be served by a local ONA Neighborhood-based Opportunity Center that must be CSBG-eligible, i.e. must provide evidence of income at or below 125% of USDHHS 2012 Poverty Guidelines?

A1: Any use of CSBG funds is limited to providing services for individuals that are at or below the 125% USDHHS 2012 Poverty Guidelines. It is important to note that this grant award contains both State and federal funds, and that State funds issued pursuant to this grant are not subject to this requirement. Thus, there is no target requirement for providing services to individuals based on income level, only an affirmative duty when using the federal portion of funds to providing evidence of the individuals served meeting the aforementioned poverty standard.

Q2: Immigration status for ESOL instruction: For the purposes of ESOL instruction, does the immigration status of the LEP client matter? Can undocumented individuals be served with federal funds? State funds?

A2: The Office for New Americans does not require proof of immigration status for clients who are served under this RFA.

Q3: Please clarify the term “dedicated staff.” May we use grant funds to support a percentage (FTE) of hours worked by one or more staff members?

A3: Ideally, the staff members for the program would work full-time on the ONA Opportunity center. ONA defines “dedicated staff” to mean staff who spends more than 70% of their time on ONA Opportunity Center.

Q4: Can ESOL services be offered at more than one designated site (for example, in two different locations within the target service area)?

A4: Ideally the organization/consortium will have a clearly identified single location for an ONA Opportunity Center. Multiple sites that improve community access and ease of service delivery are not precluded. A description of the site(s) would need to be provided in the proposal.

Q5: Please clarify the definition of “dedicated space.” Must space be set aside for exclusive use by the Neighborhood Opportunity Center or might this space be shared with other programs of the agency or used by other programs when not required for activities of the Opportunity Center? For instance, might private space required one day a month for private consultations with ONA Legal Counsel be used for other programs on other days?

A5: Yes, dedicated space must be set aside for Office for New Americans Opportunity Center purposes during the proposed hours of operations of the ONA Opportunity Center.

Q6: Can program service components be provided at two different physical sites that are within walking distance of each other?

A6: Ideally the organization/consortium will have a clearly identified single location for an ONA Opportunity Center. Multiple sites that improve community access and ease of service delivery are not precluded and will be considered. A description of the site(s) needs to be provided in the proposal for consideration.

Q7: Can we use multiple sites or satellite sites for selected program activities as long as there is a single primary site/ point of entry and each site is identified with appropriate signage?

A7: Ideally the organization/consortium will have a clearly identified single location for an ONA Opportunity Center. Multiple sites that improve community access and ease of service delivery are not precluded and will be considered. A description of the site(s) needs to be provided in the proposal for consideration.

Q8: Can services be provided at multiple sites, rather than within a single Opportunity Center?

A8: Ideally the organization/consortium will have a clearly identified single location for an ONA Opportunity Center. Multiple sites that improve community access and ease of service delivery are not precluded and will be considered. A description of the site(s) need to be provided in the proposal for consideration.

Q9: Can ESOL teaching be provided at different site than immigration and other services?

A9: Yes. As with any RFA, a description of the site(s) would need to be provided in the proposal.

Q10: There are various mentions of having designated space for the Opportunity Center? Does this mean that spaces can only be used for Opportunity Center activities? Or is it OK to have spaces designated for scheduled opportunity center activities and used for other purposes in other non-Opportunity Center times? Our organization has community offices with spaces that are already used for classes, legal intakes, etc etc and we are wondering if we can use these same spaces for ONA activities.

A10: Dedicated space must be set aside for Office for New Americans Opportunity Center purposes during the proposed hours of operations of the ONA Opportunity Center. Space costs must be accounted for at a pro-rated amount if the space is not used for the majority of the time for ONA Opportunity Center purposes.

Q11: Can staff training be provided off site or in non ONA dedicated parts of the building?

A11: Yes

Q12: Can conversation practice/tutoring be held at a different site than ESOL classes?

A12: Ideally the organization/consortium will have a clearly identified single location for an ONA Opportunity Center. Multiple sites that improve community access and ease of service delivery are not precluded and will be considered. A description of the site(s) need to be provided in the proposal for consideration.

Q13: Is there a role for providing specialized assistance to the elderly and disabled, who often need extra help to complete applications? This has been an important part of the provision of immigration assistance in the past.

A13: The RFA does not preclude these services, however the minimum service goals must be achieved and the proposed specialized assistance must be explained in the application.

Q14: Can grant monies be spent on transportation services for refugees attending the program to help improve attendance? Bus passes or a multi-person van, for example?

A14: No, student travel is a prohibited expense, as listed under Ineligible Funding Purposes on pages 5-6 of the RFA.

Q15: Requirement to use CitizenshipWorks to prepare naturalization applications: Is the preparation of applications through CitizenshipWorks required of organizations that currently use other web-based client management systems to prepare immigration forms? Many organizations spend significant funds on such client management databases (such as LawLogix) that allow them to produce reports, run deadline reports that prevent filing deadlines from falling through the cracks, and conduct searches to identify classes of clients eligible for newly-announced government benefits such as deferred action. Requiring such organizations to use CitizenshipWorks instead will either mean that citizenship clients will no longer be integrated in the organization's database - which may not be acceptable because their deadlines cannot be checked - or will require double-entry into the organization's database, which is an inefficient use of resources. We urge ONA to only require the use of CitizenshipWorks of applicants who do not use another database system for preparing forms.

A15: While the use of CitizenshipWorks is generally required, an organization that can demonstrate they have comparable software may be allowed to substitute one data base for the

other. Any substitute software being used must be explained and included as part of the RFA application. ONA must approve the substitution prior to execution of a contract.

Q16: If USA Learns is used, what are the technical requirements for this program? On line, they state the program does not work well in a computer lab because of excessive traffic. Would computers in a large classroom work?

A16: Technical requirements for USA Learns can be found on the USA Learns website: <http://www.usalearns.org>. The USA Learns model has been proven to work when incorporated into a teaching setting with a trained professional and students participating in-class with the use of computers or tablet devices.

Q17: Regarding the ESOL program: if the USA Learns program is not used by a multi-organization applicant, could a variety of other ESOL programs at the various community organizations be used, if each met the relevant standards?

As an example of one such program, would Rosetta Stone English-language program fit the criteria?

A17: Other ESOL training models may be proposed in the application. Alternative models which incorporate technology into in-class instruction are preferred. Proposed alternatives must provide detailed work and accountability measurements.

Regardless of the instruction model, all models are required to incorporate, recruit and train a significant cadre of community volunteers. These community volunteers will help with English instruction and link new Americans to their communities. Training of volunteers must be documented.

Q18: In the ESOL component, would the Learner Web program, approved by the NYS Department of Education for use by adult learners, be an acceptable alternative or supplement to the USA Learns software?

A18: Other ESOL training models may be proposed in the application. Alternative models which incorporate technology into in-class instruction are preferred. Proposed alternatives must provide detailed work and accountability measurements.

Regardless of the instruction model, all models are required to incorporate, recruit and train a significant cadre of community volunteers. These community volunteers will help with English instruction and link new Americans to their communities. Training of volunteers must be documented.

Q19: Can computer lab coursework (*USALearns*) be completed at a different site than ESOL classes?

A19: A model for ESOL training will blend the use of trained teachers, community volunteers, and in-class use of a computer or tablet device for access to the ESOL learning software USA Learns (www.usalearns.org). Other ESOL training models may be proposed in the application. Alternative models which incorporate technology into in-class instruction are preferred. Proposed alternatives must provide detailed work and accountability measurements.

Regardless of the instruction model, all models are required to incorporate, recruit and train a significant cadre of community volunteers. These community volunteers will help with English instruction and link new Americans to their communities. Training of volunteers must be documented.

Q20: ESOL training: Can we use an approved State Ed curriculum which incorporate computer literacy, workplace readiness/job retention skills, pathway to GED, etc.

A20: Other ESOL training models may be proposed in the application. Alternative models which incorporate technology into in-class instruction are preferred. Proposed alternatives must provide detailed work and accountability measurements.

Regardless of the instruction model, all models are required to incorporate, recruit and train a significant cadre of community volunteers. These community volunteers will help with English instruction and link new Americans to their communities. Training of volunteers must be documented.

Q21: Will proposals that use the USA Learns model be given priority over proposals that propose other models?

A21: Other ESOL training models may be proposed in the application. Alternative models which incorporate technology into in-class instruction are preferred. Proposed alternatives must provide detailed work and accountability measurements.

Regardless of the instruction model, all models are required to incorporate, recruit and train a significant cadre of community volunteers. These community volunteers will help with English instruction and link new Americans to their communities. Training of volunteers must be documented.

Q22: Are civics classes delivered as part of naturalization preparation allowable to be counted as ESOL training?

A22: Yes. Other ESOL training models may be proposed in the application. Alternative models which incorporate technology into in-class instruction are preferred. Proposed alternatives must provide detailed work and accountability measurements.

Regardless of the instruction model, all models are required to incorporate, recruit and train a significant cadre of community volunteers. These community volunteers will help with English

instruction and link new Americans to their communities. Training of volunteers must be documented.

Q23: Can services provided by and at agency and funded through another source be offered to program participants at no cost to participants?

A23: Yes.

Q24: Can agency that is funding service be charged for ONA participants use of service, for example child care?

A24: ONA participants may not be charged by the host agency for funded activities (ESOL, Naturalization, etc). Applicants are required to include partnerships with other non-profit organizations in their proposal. A partner organization is an organization which is not part of the consortium, yet which has agreed to provide additional or complementary direct services. Partner organizations will not receive a portion of the grant funds and thus will not be required to complete a Memorandum of Understanding. We request that partner organizations provide a brief letter on letterhead expressing their support for the application and setting forth the commitment the organization is making to the application. This description should closely reflect the commitment outlined in the application and include details, such as those asked in this question.

Q25: What constitutes “teaching professionals”? (RFA page 16) Do teachers need to hold any particular certification?

A25: Teaching professionals are those people who are New York State Education Department certified teachers/instructors or have a recognized certification in English-for-Speakers-of-Other-Languages instruction.

Q26: Regarding Hosting Immigration Law Consultations, are ONA Opportunity Centers expected to bear costs of providing interpreting for non-English speaking clients who seek to access the ONA Legal Counsel, or are these costs provided by funds from the ONA Legal Counsel grant?

A26: ONA Opportunity Center applicants should demonstrate language capabilities and cultural competence matching the languages and cultures of the service area. While this is the case, associated interpretation costs to access the ONA Legal Counsel during consultation days will be provided by funds from the ONA Legal Counsel grant.

Q27: If the ONA Opportunity Center has BIA recognition and accreditation, would the center still need to wait for ONA Legal Counsels to review all citizen applications prior to submission to the USCIS?

A27: The ONA Legal Counsel will review each citizenship application for legal issues or coordinate with BIA accredited representatives or attorneys on staff at the ONA Opportunity Centers to review citizenship applications for legal issues. The ONA Legal Counsel and other legal reviewers should follow-up with clients as needed. After ensuring appropriate legal review, the ONA Legal Counsel should provide the citizenship application to the client. The client is responsible to send in the citizenship application.

Q28: Involvement of ONA Legal Counsel for providers that already have immigration attorneys on staff: If a non-profit has experienced attorneys and BIA-accredited representatives on staff who can a) provide legal consultations and representation to youth eligible for deferred action and other documented and undocumented individuals, and b) review and sign-off on naturalization applications, why would the involvement of ONA Legal Counsel still be required? Can an exception be made from the ONA Legal Counsel review of naturalization and consultation days requirements for such organizations? While it is understandable that ONA Legal Counsel is required to review and provide consultation days for ONA Opportunity Centers that do not have attorneys or BIA representatives, it seems redundant and inefficient to require this of organizations that have attorneys and BIA representatives. This requirement might even act to discourage applications from organizations whose internal operating procedures and malpractice insurance require that their attorneys and BIA representatives sign off on all applications. The requirement could also lead to conflicts of opinion between ONA Legal Counsel and the organization's own attorneys.

A28: The ONA Legal Counsel will review each citizenship application for legal issues or coordinate with BIA accredited representatives or attorneys on staff at the ONA Opportunity Centers to review citizenship applications for legal issues. The ONA Legal Counsel and other legal reviewers should follow-up with clients as needed. After ensuring appropriate legal review, the ONA Legal Counsel should provide the citizenship application to the client. The client is responsible to send in the citizenship application.

Q29: We have immigration staff attorneys on staff and we schedule regular consultations days most often once a week and provide ongoing services for all family based immigration matters. How does an ONA Opportunity Center who has an attorney on staff interact with ONA Legal Counsel?

A29: The ONA Legal Counsel will review each citizenship application for legal issues or coordinate with BIA accredited representatives or attorneys on staff at the ONA Opportunity Centers to review citizenship applications for legal issues. The ONA Legal Counsel and other legal reviewers should follow-up with clients as needed. After ensuring appropriate legal review, the ONA Legal Counsel should provide the citizenship application to the client. The client is responsible to send in the citizenship application.

Q30: Requirement to host ONA Legal Counsel law consultations: For non-profits that have weekly or periodic walk-in consultation days with staff attorneys and BIA representatives, why would hosting ONA Legal Counsel law consultations be required? Can such non-profits substitute their own lawyers and BIA representatives?

A30: The ONA Legal Counsel will review each citizenship application for legal issues or coordinate with BIA accredited representatives or attorneys on staff at the ONA Opportunity Centers to review citizenship applications for legal issues. The ONA Legal Counsel and other legal reviewers should follow-up with clients as needed. After ensuring appropriate legal review, the ONA Legal Counsel should provide the citizenship application to the client. The client is responsible to send in the citizenship application.

Q31: Services provided for deferred action cases: Does ONA funding earmarked for youth eligible for deferred action cover only consultations and referrals, or representation and applications as well? Funding consultations, but not direct legal services for these young people will not address the fundamental need for free and competent legal preparation of applications for deferred action.

A31: The ONA Legal Counsels are able to provide direct representation to immigrants in cases related to citizenship and naturalization and cases related to halting the deportation of young people eligible for deferral of deportation and work authorization pursuant to the Obama Administration's deferral of action process announced on June 15, 2012. More information is available in the ONA Legal Counsel RFA.

Details of the ONA Opportunity Centers participation in this work is highlighted on page 9 of the Office for New Americans Neighborhood-based Opportunity Centers RFA.

Q32: Does each student have to follow the same learning plan (ex. everyone must have 2 hours of ESOL, 1 hour of computer lab), or can it vary from student to student (some students will have more lab hours than others, some may attend only ESOL, some will not attend tutoring)?

A32: Other ESOL training models may be proposed in the application. Alternative models which incorporate technology into in-class instruction are preferred. Proposed alternatives must provide detailed work and accountability measurements. It is expected that each student will have a minimum of 200 hours of training.

Regardless of the instruction model, all models are required to incorporate, recruit and train a significant cadre of community volunteers. These community volunteers will help with English instruction and link new Americans to their communities. Training of volunteers must be documented.

Q33: Can you clarify if we can partner with an organization that is not in one of the designated counties as long as we have deliverables that include both ESOL and naturalization services in both counties? We would like to create a consortium to cover a large part of New York State's Southern Tier and split the deliverables between the two agencies. Please note that creating a consortium with these two agencies would serve about 21,000 foreign born residents of New York State.

If the above is allowed, can you clarify how we submit our application? Does each agency write our own application and submit them together in one package to the State?

A33: A proposal from a consortium may include other agencies and organizations, which combine to provide comprehensive services. The proposals must clarify the roles, responsibilities and operating practices of each agency. A lead fiscal agency must be designated and provide at least 25% of the programming. The lead must be located in one of the eligible service areas listed on the face page of the RFA.

All organizations in the consortium must collectively complete and execute a Memorandum of Understanding (MOU) before submitting an application. These should all come as one package for the ONA Opportunity Center.

While eligible clients may reside anywhere within New York State, it is expected that each ONA Opportunity Center will confine its outreach activities to its respective designated service area. The definition of “designated community” is defined within the agency’s certificate of incorporation. If the certificate of incorporation allows an organization to service the counties within the Southern Tier, then the designated area can include non-eligible counties if there is a demonstrable need for these services in the area. The designated area should be no smaller than the whole county for counties listed in Appendix A. Please note that an organization or consortium of organizations can apply to serve multiple counties by sending in individual applications per proposed ONA Opportunity Center.

Q34: Can an applicant include in the proposed service area, an eligible county as well counties that are not listed as eligible? For instance can we include the Capital District as a service area even though only Albany County is eligible?

A34: While eligible clients may reside anywhere within New York State, it is expected that each ONA Opportunity Center will confine its outreach activities to its respective designated service area. The definition of “designated community” is defined within the agency’s certificate of incorporation. If the certificate of incorporation allows an organization to service the counties within the Capital District, then the designated area can include non-eligible counties if there is a demonstrable need for these services in the area. The designated area should be no smaller than the whole county for counties listed in Appendix A. Please note that an organization or consortium of organizations can apply to serve multiple counties by sending in individual applications per proposed ONA Opportunity Center.

Q35: Can programs be run in the evenings only? ESOL/naturalization for example
Does dedicated space have to be in one self contained Wing or corridor or can the dedicated space be in separate parts of a building with one dedicated administrative office.
Can the dedicated classrooms be used for non ONA activities during the programs off hours?

A35: The RFA does not preclude this type of model. Hours of operations must be significant for all programs.

Dedicated space does not need to be one self-contained space within a building. The ONA Opportunity Center budget can only be billed for justifiable space usage. Spaces can be used for

non-ONA activities during the program off hours if the space during the time is not paid for by the ONA Opportunity Center funding.

Q36: Is there a specific age category that we will be required to serve or is it OK to promote services for all adults 18 and over who meet the income requirements?

A36: Eligible program participants include non-citizens of the United States residing anywhere within New York State who have attained 16 years of age and are not enrolled or not required to be enrolled in secondary school under NYS law. Eligibility for deferred action process services is restricted to individuals of the ages specified for the deferred action process by the U.S. Department of Homeland Security.

Q37: Should supplemental services that are not required by the RFP but which will be made available to the program participants at no cost to this funder be indicated in the narrative?

A37: Yes, applicants are required to include partnerships with other non-profit organizations in their proposal. A partner organization is an organization which is not part of the consortium, yet which has agreed to provide additional or complementary direct services. Partner organizations will not receive a portion of the grant funds and thus will not be required to complete an MOU. We request that partner organizations provide a brief letter on letterhead expressing their support for the application and setting forth the commitment the organization is making to the application. This description should closely reflect the commitment outlined in the application.

Q38: In light of the requirement to exhaust CSBG funds before applying State funds to the costs of Opportunity Centers, how will the Centers be expected to track income levels of clients? What kind of proof and record-keeping will be required?

A38: ONA Opportunity Centers are required to verify the income levels of clients billed to CSBG federal dollars. Proof of income may include a copy of public assistance eligibility (EBT card, for example), pay stub, tax records, proof of unemployment, and other like tangible evidence. A tracking tool will be developed for use in reporting at the time of contracting.

Q39: Clarification regarding requirements for hosting provider training: On page 11, the second paragraph under the section entitled *Host Immigration Law Consultations and Provider Trainings* indicates, "The ONA Opportunity Center will work with the ONA BIA Trainer to schedule the BIA training, provide training space, recruit and register clients for the training, and provide administrative support." Why would the ONA Opportunity Center be required to recruit clients for the BIA training?

A39: The ONA Opportunity Centers will be the focal point for communities to embrace New Americans.

Q40: RFA page 10 says that ONA Legal Counsel will review and approve all citizenship applications before submission to USCIS, implying that the ONA Legal Counsel will indeed file G-28s. There will be 30 ONA sites, with about 100 applications each, to be divided amongst

three ONA Legal Counsels. Is it correct to assume that each counsel is responsible for 1000 applications per year? Is it reasonable for each counsel to complete this volume of applications?

A40: There are up to four (4) ONA Legal Counsels. The Office for New Americans believes this is a reasonable volume of work.

Q41: IRC considers four citizenship drives per year and a total of 100 N-400 applications to be very reasonable deliverables. However the RFA states that ONA sites will collaborate with ONA Legal Counsels to ensure legal review of all citizenship applications prior to submission to USCIS. Can ONA provide clarification on this? Does this mean the ONA Legal Counsel signs off on each application even though there is an accredited BIA representative on staff?

A41: The ONA Legal Counsel will review each citizenship application for legal issues or coordinate with BIA accredited representatives or attorneys on staff at the ONA Opportunity Centers to review citizenship applications for legal issues. The ONA Legal Counsel and other legal reviewers should follow-up with clients as needed. After ensuring appropriate legal review, the ONA Legal Counsel should provide the citizenship application to the client. The client is responsible to send in the citizenship application.

Q42: Must each N-400 be reviewed by an ONA Legal Counsel? Since there is a limited number of ONA Legal Counsel, what logistics can each ONA coordinate to ensure timely submission of all N-400 applications?

A42: The ONA Legal Counsel will review each citizenship application for legal issues or coordinate with BIA accredited representatives or attorneys on staff at the ONA Opportunity Centers to review citizenship applications for legal issues. The ONA Legal Counsel and other legal reviewers should follow-up with clients as needed. After ensuring appropriate legal review, the ONA Legal Counsel should provide the citizenship application to the client. The client is responsible to send in the citizenship application.

Issues of coordination and logistics will be addressed by DOS after application review and award. We will take all steps necessary to insure timely submission and efficient coordination among grantees.

Q43: Staff from my organization currently hold BIA partial accreditation to assist with naturalization applications, which they needed 40 hours worth of training to obtain. We understand that only this formal approval qualifies them to provide counseling to immigration clients and to complete immigration forms. How would volunteers work within this process?

A43: ONA Opportunity Centers will recruit and train volunteers to assist new Americans in using the software and completing their citizenship applications. Volunteers will not be expected to do work that requires BIA certification.

Q44: Reliance on volunteers to provide services: Why is the recruitment and training of volunteers required for preparing naturalization applications for organizations that have enough experienced paralegals, attorneys and BIA representatives to provide these services without the

use of volunteers? This requirement appears to discourage applications from organizations that, over the years, used BRIA citizenship funding to build a strong base of expertise on staff. Such organizations should not be required to switch to a volunteer-based model. Given the documented lack of free and competent immigration legal representation in NYS and throughout the nation, organizations that have managed to develop experienced and reliable immigration staffing should not be discouraged from applying for ONA funding by being required to switch to a different model of service.

A44: ONA Opportunity Centers will recruit and train volunteers to assist new Americans in using the software and completing their citizenship applications. Volunteers will not be expected to do work that requires BIA certification. This can serve to supplement already existing programs and staff.

Q45: The RFA states that volunteers will be recruited to assist with the completion of N-400 applications. What security measures can ONA Opportunity Centers take to trust volunteers with sensitive information, such as social security numbers, passports, divorce decrees, birth certificates, arrest records, etc.? In lieu of trustworthy community volunteer members, can ONA Opportunity Centers use paid staff to assist clients with N-400 applications?

A45: ONA Opportunity Centers are expected to train volunteers, which should include a written agreement that confirms and attest to an understanding of confidentiality. When trustworthy community volunteer members are not available, ONA Opportunity Centers use paid staff to assist clients with the naturalization application.

Q46: Requirement to utilize citizenship drives model: If a non-profit that currently receives citizenship funding from BRIA has the proven capacity to prepare and submit more than 100 citizenship applications per year using a rolling-basis, weekly citizenship intake model, would that organization be required to provide 4 citizenship drives per year in order to receive ONA funding? Why would this be required if the organization can meet the 100 application target without organizing citizenship drives? Can use of the citizenship drives model be considered supplementary to an organization's existing model of providing regular, weekly citizenship intakes?

A46: While these citizenship drives are an important component of the program, ONA Opportunity Centers will also assist new Americans with citizenship applications on a rolling basis. From these combined efforts, each ONA Opportunity Center will recruit and assist enough clients with naturalization to submit at least 100 citizenship applications to USCIS per year.

Q47: Is there a size/participation amount attached to the four citizenship drives each year?

A47: No.

Q48: Must each client complete a minimum of 200 hours of ESOL training? (page 7 & 16). 200 hours of ESOL training per client in a 10 week period would amount to 20 hours a week for ESOL classes, cutting into work and family life for clients. In order to ensure that clients are able

to balance work and family with classes, the average ESL class consists of 20 hours (2 hours per week for 10 weeks). We have found great success and high pass rates with this scheduling.

A48: Each ONA Opportunity Center will provide at least 200 hours of ESOL training to more than 200 LEP clients per year, thereby dramatically expanding new Americans' access to English-language instruction in our State. Clients who receive the minimum 200 hours of ESOL training may be counted anew as they progress into higher levels of proficiency. The time period for completing the 200 hours can be specified by the applicant.

Q49: If an Opportunity Center has more than 200 LEP clients enrolled in ESOL training, will every client have to complete at least 200 hours of instruction, or will an attrition rate be permitted?

A49: Each ONA Opportunity Center will provide at least 200 hours of ESOL training to more than 200 LEP clients per year, thereby dramatically expanding new Americans' access to English-language instruction in our State. Clients who receive the minimum 200 hours of ESOL training may be counted anew as they progress into higher levels of proficiency.

Q50: Can the outcome goals for the first year be adjusted to allow for initial planning and start up time?

A50: No.

Q51: The RFA requires that at least 200 hours of ESOL training provided to more than 200 LEP clients per year. Can that language be modified to offer at least 200 hours of ESOL training...? It's difficult to ensure that enrolled students will attend all sessions.

A51: No. Research demonstrates that to be successful these are the minimum hours required.

Q52: Do only in-class teaching hours count for 200 minimum contact hours or can other activities, such as one-on-one tutoring and conversation sessions, also count as contact hours?

A52: ESOL instruction hours are a cumulative figure of all areas presented in the instruction model the applicant presents.

Q53: Would you be willing to consider modifying the ESOL training outcome to match the NYS Education Department requirements of 150 hours of ESOL instruction, rather than requiring 200 hours? This would allow us to use providers that have classes in place providing instruction for 150 hours.

A53: No.

Q54: Do eligible clients need to show proof of income? How would the ONA Opportunity Center enforce income eligibility?

A54: ONA Opportunity Centers are required to collect income verification. Contractors will be expected to report based on the two income eligibility groups (1) at or below 125% of the US DHHS 2012 Poverty Guidelines and (2) those with incomes that exceed this income level and those who do not have verification of income.

Q55: Approximately what percentage of the grant to fund an Opportunity Center is expected to come from federal Community Service Block Grant (CSBG) funds, and therefore will have to be spent serving clients at or below 125% of the US DHHS 2012 Poverty Guidelines?·

A55: Roughly 50% of the funds Statewide are expected to come from federal CSBG funds.

Q56: Federal Poverty Guidelines for our area exclude a great number of low income individuals because living costs in the County are extremely high. For example, HUD has given Westchester County permission to use its calculation of 80% AMI, rather than HUD’s own calculation which includes averaging this income limit on a national basis. Many of Westchester County’s working poor cannot afford Legal Services provided by Legal Services of the Hudson Valley, the local legal services corporation. According to the National Low Income Housing Coalition 2012 report, the hourly housing wage to live in Westchester is calculated at \$30.38 for a 2 bedroom apartment while the estimated mean renter hourly wage is \$17.68.

Below is another living wage report prepared by Pennsylvania State University

Hourly Wages	One Adult	One Adult, One Child	Two Adults	Two Adults, One Child	Two Adults, Two Children
Living Wage	\$13.38	\$22.57	\$18.42	\$27.62	\$34.59

A56: The Federal US DHHS 2012 Poverty Guidelines governing this award are set by the federal government, required for the use of CSBG funds and cannot be changed.

Q57: Definition of “significant”: The RFA states that ONA Opportunity Centers have to recruit and train a "significant" number of community volunteers. How is "significant" defined and/or measured?

A57: Significant number of community volunteers can be measured in the number of people volunteering during a class period, for example.. ONA Opportunity Centers should aim to pair clients with a volunteer. Ultimately, the host agency will explain in its application what they expect regarding volunteers.

Q58: Disability waivers: On page 17, the documentation required for naturalization applications lists as #4, verification that the client took the exam and passed it, which does not cover applications for citizenship applicants who request a waiver of the English and civics test requirements based on disability. The list of required documentation should be revised to allow for follow-up on disability waivers, not just testing.

A58: The ONA considers disability and fee waivers as part of the application process. This allows for follow-up on these waivers.

Q59: Eligibility for deferred action: On page 19, the RFA states that eligibility for deferred action is restricted to individuals under 30 years of age. This is not accurate. The June 15, 2012 DHS memo states "not above 30 years of age" and there has been significant discussion already as to whether this means "under 30" or "under 31." This will be clarified by August 14, 2012 by USCIS, but until then we urge ONA to use the wording of the DHS memo ("not above 30 years of age").

A59: The ONA will use the deferred action age criteria established by the U.S. Department of Homeland Security.

Q60: Protecting client confidentiality: On page 26, the record keeping requirement mentions that records that are deemed to possess "long-term or historic value" must be transferred to DOS/ONA. This is very troubling for any undocumented immigrants coming in for legal consultations and/or deferred action and entrusting organizations with their names, addresses, and other identifying information. This information is protected by the attorney-client privilege and cannot be disclosed to third parties - such as ONA - without the consent of the clients. Undocumented clients are not likely to give such consent. As noted in other New York State contracts providing similar services, specific individual information is also protected by the Social Services Law consistent with provisions of applicable State and Federal laws and regulations (e.g., Sections 136 and 372 of the Social Services Law, 18NYCRR 357). We request that ONA consider removing this requirement as it relates to individuals to whom services are provided under this contract, or accepting redacted records that protect client confidentiality.

A60: The Contractor must maintain current and accurate fiscal and accounting controls to support the claims for payment. Records must adequately identify revenue sources and expense items for all contracted activities. Accounting records must be supported by clear documentation for all funds received and disbursed. Records must be retained and be accessible for a period of six (6) years from the end of the contract or last payment or last contract transaction.

If any claim, audit, litigation, or State/Federal investigation is commenced before the expiration of the aforementioned record retention period, the records must be retained by the contractor

until all claims or findings regarding the records are finally resolved. DOS/ONA or its designee shall have access to any records relevant to the project (including books, documents, photographs, correspondence, and records), for audits, examinations, transcripts, and excerpts. If DOS/ONA determines that such records possess long-term or historic value, they must be transferred, upon request, to DOS/ONA.

DOS/ONA will comply with all required State and federal information privacy laws. The Office for New Americans does not require proof of immigration status for clients who are served under this RFA.

2. APPLICANT ELIGIBILITY

Q61: I am an adult education program in a school district and also provide ESOL classes and computer literacy services to a one-stop, can I apply for this grant?

A61: Community Action Agencies, or Community Based Organizations, as defined in Section V of this RFA, or not for profit organizations with 501 (c) (3) IRS status are eligible to apply or to be part of a consortium under this RFA. If the adult education program meets this requirement and can fulfill the contractual obligations as outlined in the RFA, then yes.

Q62: If we receive funding from USCIS, how will this effect this grant if at all?

A62: This should have no effect, unless USCIS specifically prohibits the organizations participation.

Q63: The eligibility requirements state that more than half of the Board of Directors of applicants must reside within the geographic catchment area. Is “New York City” a sufficient catchment area, or do Board members need to live in the boroughs we propose to serve?

A63: More than half of the Board members should reside within the organizations “designated” service area as defined within the organizations certificate of incorporation. However, each ONA Opportunity Center is permitted to provide services to new Americans regardless of where in New York State the client resides.

Q64: Do sub-applicants or sub-contractors have to meet the board of directors requirement contained in either NY Executive Law section 159-e(2) or NY Executive Law section 159-e(4) (p. 14, first paragraph, RFA #12-ONA-09) or does this requirement only apply to the lead applicant?

A64: Funds awarded under this RFA may not be used to pay for program services to be performed by independent contractors or subcontractors. It is expected that the agency or consortium will collectively satisfy the program requirements contained within the RFA. There are however, areas where subcontracting is permissible. Fiscal audits for example, are routinely conducted by independent contractors and these contractors may or may not reside in the agencies designated service area. Payroll services are another such example. The lead agency may subcontract with consortium members to provide services outlined in this RFA.

Q65: Is a CBO eligible for applying to host an ONA Opportunity Center in Kings county, if the organization has a board of directors with more than 50% members residing in NYC (not necessarily in Kings county)?

A65: The definition of “designated community” is defined within the agency’s certificate of incorporation. If the certificate of incorporation allows an organization to service Kings County and the surrounding boroughs, then as such, more than fifty percent of the Board membership should mirror this profile.

Q66: Please define “designated community” for the purposes of the requirement that more than half of a CBO’s board members must reside in the same “designated community” as the population that an organization serves.

A66: The definition of “designated community” is contained within the agency’s certificate of incorporation. If, for example, the certificate of incorporation defines the agencies “designated community” as the borough of Queens, than more than half of the Board members should reside in the borough of Queens.

Q67: Can a for-profit organization which provides staff development and training for specific industries be included as a funded member of a consortium application, if the lead is a CBO fulfilling all other requirements?

A67: All consortium members must be eligible grant participants as defined by the program statue or regulation. Eligible grant participants include Community Action Agencies or Community Based Organizations, as defined in Section V of this RFA, and not-for-profit organizations with 501 (c) (3) IRS status.

Q68: On page 13 it states Community Action Agencies or Not-for profit organizations can apply. On page 21 it states applicant must be a not-for-profit organization and a CAA or CBO. Can you clarify if a not-for profit must also be a CAA or CBO or if that is a typo.

A68: In section VIII, Evaluating the Application, under application information, number 2, delete the information provided and insert, “Applicant is a CAA, or CBO, as defined in Section V of this RFA, **OR** another not-for-profit organization with 501 (c)(3) IRS status.”

Q69: Does not being a certified M/WBE hamper the organization not be consider?

A69: M/WBE certification is not a requirement of applicant organizations. Certification is required only for vendors used by the applicant to fulfill M/WBE goals.

Q70: If more than one organization apply under the same proposal, what qualifications are you looking for in the lead agency?

A70: A proposal from a consortium may include other agencies and organizations which combine to provide comprehensive services. The proposal must clarify the roles, responsibilities and operating practices of each agency. A lead fiscal agency must be designated and provide at least 25% of the programming. This is the primary qualifier of the lead organization. Also, see RFA Section V, Applicant Eligibility for a more comprehensive listing of lead/fiscal agent requirements.

Q71: If a community-based organization with 501(c)(3) IRS status has a board of four members, two of whom live in the area to be served at the ONA Opportunity Center, is the CBO eligible to apply for funding?

A71: Organizations must have a board of directors of which more than half of the members reside in such designated communities which they serve. Two out of four is not more. In this case scenario, the agency would need at least three members to meet the RFA requirement.

3. APPLICATION DEVELOPMENT

Q72: Can a work plan be presented in the Program Narrative section of the application in a table (“logic model”) in landscape format?

A72: Yes, a work plan may be presented in the Program Narrative section of the application in landscape format.

Q73: I’m writing to inquire if an applicant for the above-mentioned grants need demonstrate that it will provide all the services outlined in the proposal? For instance, is it necessary that the organization assist immigrants apply for citizenship/naturalization AND conduct English language and civics courses or may the applicant solely provide assistance to immigrants in preparing and completing the citizenship applications and legal advice and help for complex immigration questions?

A73: Yes, applicants/consortium are required to provide all the services outlined in the proposal. These services include English-for-Speakers-of-Other-Languages Training, new Deferred Action Process for Eligible Youth and Associated Work Authorization Assistance, Naturalization Assistance, Entrepreneurism Support, Host Immigration Law Consultations and Provider Trainings, and include access to additional opportunities for new Americans by working with nearby NYS Department of Labor One-Stop centers and link new Americans to job training and employment opportunities. Each of these services is described under the General Program Services section.

Q74: Services provided: On p. 7, it is stated that each ONA Opportunity Center will host various services. Does this mean that each ONA Opportunity Center has to offer all the enumerated services, or can it offer just some?

A74: Yes, applicants/consortium are required to provide all the services outlined in the proposal. These services include English-for-Speakers-of-Other-Languages Training, new Deferred Action Process for Eligible Youth and Associated Work Authorization Assistance, Naturalization Assistance, Entrepreneurism Support, Host Immigration Law Consultations and Provider Trainings, and include access to additional opportunities for new Americans by working with nearby NYS Department of Labor One-Stop centers and link new Americans to job training and employment opportunities. Each of these services is described under the General Program Services section.

Q75: Must each organization in a consortium provide either ESOL or naturalization assistance? (page 13).

A75: Each organization within the consortium does not need to provide all of the services as long all of the services are provided by the consortium.

Q76: Please clarify ONA Opportunity Center requirements in relation to proposals that are submitted as a consortium of agencies. In reference to what the RFP describes as requirements of an ONA Center, do these requirements extend to each separate agency in the consortium or is it expected that the consortium collectively satisfies the requirements?

A76: Each organization within the consortium does not need to provide all of the services as long all of the services are provided by the consortium.

Q77: Could you please clarify the allowable payment structure that would govern projects that include a consortium of organizations. The RFP indicates on page 13 that the lead fiscal agent cannot pass through grant funds to other recipients but that it could pay other partners for services. We take this to indicate that the lead agency would sub-contract with consortium partners for services the lead agency is not providing but if that is incorrect please clarify. Page 5 of the RFP indicates funds are not to be used to pay independent contractor or sub-contractor, should we take that to mean the exclusion only applies to contractors or sub-contractors who are providing services outside the scope of allowable services as outlined in the RFP?

A77: The lead agency would pull together a consortium of partners for services the lead agency is not providing; if the lead agency so chooses. The lead agency may subcontract with consortium members to provide services outlined in this RFA.

Q78: Would you provide further information regarding what you are planning and looking for in the data base for tracking of services? Example, BRIA with their BIN data entry.

A78: Tracking forms will be provided to service providers to ONA Opportunity Centers keep track of service provision. Those with client relation/case management software can program this information into its database.

Q79: Page 7 of the RFA states: *if awarded, the Community-based organizations will be required to attend ROMA training. DCS will provide a ROMA Training Webinar on Wednesday, July 18, 2012 through the New York State Community Action Association (NYSCAA).* Does ONA require all applicants to attend this training prior to submitting an application?

A79: The July 18th, 2012 ROMA training has been moved to July 25, 2012. This is a live webcast and only available on this day. There is no cost associated with this webinar. Anyone viewing the training must register prior to the webcast in order to participate.

As stated in the RFA, “If awarded, the Community-based organizations will be required to attend ROMA training”. Prospective applicants are not required to attend but encouraged to participate if they are unfamiliar with ROMA. Successful applicants often demonstrate a greater familiarity with ROMA upon completion of the webinar. If organizations chose not to participate in this webinar offered on July 25, 2012 they will need to demonstrate attendance at other ROMA training prior to final processing of the ONA contract.

Q80: Clarification regarding ROMA Training: Regarding the ROMA training described on page 7, there is limited information available about the cost and content of this training on the www.nyscaaonline.org website, and there is no information about registering for the July 18th webinar mentioned. Please provide clarification on the cost and content of the training and webinar sessions so that applicants may budget for appropriate staff to participate. Please also explain the relationship between this training and the requirements under this RFA so that it is clear how providers are meant to utilize this information in the context of the proposed program.

A80: The July 18th, 2012 ROMA training has been moved to July 25, 2012. This is a live webcast and only available on this day. There is no cost associated with this webinar. Anyone viewing the training must register prior to the webcast in order to participate. Awardees are afforded additional ROMA training once the contract gets underway. Understanding the relationship between this training and the “requirements under this RFA” is informed by completing or participating in the ROMA webinar and subsequent training.

Q81: The ROMA trainings mentioned on RFA page 7 are scheduled for July 18th. Will there be trainings available to CBOs after an award is made?

A81: The July 18th, 2012 ROMA training has been moved to July 25, 2012. This is a live webcast and only available on this day. Anyone viewing the training must register prior to the webcast in order to participate. Awardees are afforded additional ROMA training once the contract gets underway.

Q82: Will ROMA training be available after the award date of August 31, as well as on July 18?

A82: The July 18th, 2012 ROMA training has been moved to July 25, 2012. This is a live webcast and only available on this day. Anyone viewing the training must register prior to the

webcast in order to participate. Awardees are afforded additional ROMA training once the contract gets underway.

Q83: Page 7 states that, if awarded Community-based organizations will be required to attend a ROMA training, with a ROMA Training Webinar taking place on Wednesday, July 18, 2012. Are all applicants of this RFA required to participate in this training since it is taking place before the awards are announced?

A83: The July 18th, 2012 ROMA training has been moved to July 25, 2012. This is a live webcast and only available on this day. Anyone viewing the training must register prior to the webcast in order to participate. Prospective applicants are not required to attend but encouraged to participate if they are unfamiliar with ROMA. Successful applicants often demonstrate a greater familiarity with ROMA upon completion of the webinar. Additional training will be available once contracts are awarded.

Q84: Just to clarify, it seems that organizations can submit separate applications with separate budgets if serving more than one target area. So - if, for example, we submit 4 applications to cover Kings, Queens, Bronx, and Richmond it is feasible that all are selected and that we could receive a total award of \$700,000 (assuming we apply for the full \$175,000 award in each of our applications)? Also is there a limit to the # of applications we can submit?

A84: Yes, a group may submit separate applications to cover more than one ONA county as long as such area meets the organizations definition of “designated community.” There is no limit to the number of applications that can be submitted.

Q85: Are letters of support allowed?

A85: Yes, letters of support are allowed and encouraged.

Q86: How should applicants submit the letters of support from partner organizations and letters of commitment from a coalition of stakeholders? Should these letters be attached to the application?

A86: Ideally these letters will come attached to the application.

4. ADMINISTRATION

Q87: The RFP states that the project start date is October 1, 2012. When do you anticipate notifying applicants whether or not they have received an award? If we are expected to start delivering services on October 1, will award notifications go out sufficiently early for us to hire staff and otherwise ramp up operations? Alternatively, will there be a start-up period built into the contract beginning on October 1?

A87: We anticipate giving awardees sufficient start up time including a start-up period built into the contract beginning on October 1.

Q88: Can volunteers for the program receive stipends that are subsidized by another source of funding and given as an in-kind contribution to the program or must they be “pure” volunteers who receive no stipends for their services?

A88: Yes, volunteers for the program may receive stipends that are subsidized by another source of funding as long as the funding source permits it. Individuals providing services under this RFA that do not receive payment for services directly or indirectly (i.e., via a subcontract from the resulting contract) will be acceptable as volunteers. General volunteer stipends and incentive items or gift cards are ineligible funding purposes for this RFA funding source.

Q89: Can services of ESL teacher funded through another source teach students enrolled in this RFA? If yes can the teacher’s salary be used as matching funds?

A89: Yes, the services of an ESL teacher funded through another grant source can teach students enrolled in this RFA. There are no matching fund requirements for this RFA. The State funds are considered the match for the purposes of this RFA.

Q90: Volunteer: Should stipend be included in the budget for volunteers?

A90: Volunteers for the program may receive stipends that are subsidized by another source of funding as long as the funding source permits it. Individuals providing services under this RFA that do not receive payment for services directly or indirectly (i.e., via a subcontract from the resulting contract) will be acceptable as volunteers. General volunteer stipends and incentive items or gift cards are ineligible funding purposes for this RFA funding source.

Q91: Can staff trainer be reimbursed if trainer is from an outside agency? For example cross cultural trainer?

A91: This Request for Applications (RFA) seeks organizations or a consortium of organizations within counties of the State with high concentrations of newcomers. A proposal from a consortium may include other agencies and organizations, including a trainer from another agency as long as that trainer belongs to an entity that meets the eligibility requirements as outlined within the RFA, Organization Participant Eligibility Requirements. The proposals must clarify the roles, responsibilities and operating practices of each agency. A lead fiscal agency must be designated and provide at least 25% of the programming.

Q92: It is stated in the RFA that lead applicants are prohibited from sub-granting funds to other recipients (page 13). In what manner should lead members of consortiums distribute funds to other consortium members if subcontracting is prohibited?

A92: The prohibition on sub-granting refers to the delivery of program services as outlined in the RFA. The expectation is that the submitting organization or consortium has the capacity to conduct the required program activities. The lead organization is permitted to contract for services with other consortium partners or consultants to provide services that the fiscal agent cannot provide itself.

Q93: The RFA states that, "Profit/Fee is not allowable except when subcontracting for routine goods and services with commercial organizations (page 6)" and "The fiscal agent is permitted to contract for services with other consortium partners or consultations to provide services that the fiscal agent cannot provide itself (page 13.)" However, the RFA also states funds awarded under this RFA may not be used to pay an independent contractor or sub-contractor (page 5). How should recipients of the grant categorize those contracted for outside services?

A93: The prohibition on subcontracting refers to the provision of program services as outlined in the RFA. These services/activities should be provided by the agency or consortium of eligible agencies as defined within the document. The expectation is that the submitting organization or consortium has the capacity to conduct the required program activities. The fiscal agent, however, may not have the capacity to perform various functions and may need to contract out for services. That would be permissible under this RFA. For example, the audit is done by an independent auditor and payroll services are often completed outside the agency.

Q94: There are conflicting statements regarding the ability to use funds from these P 5 Funds awarded under this RFA may not be used to pay and independent contractor or sub-contractors P13. The fiscal agent is permitted to contract for services with other consortium partners or consultants to provide services

A94: The prohibition on subcontracting refers to the provision of program services as outlined in the RFA. These services/activities should be provided by the agency or consortium of eligible agencies as defined within the document. The fiscal agent, however, may not have the capacity to perform various functions and may need to contract out for services. That would be permissible under this RFA. For example, the audit is done by an independent auditor and payroll services are often completed outside the agency. These are two different issues. In the program side there is no independent contractors or sub contractors but can make awards with in partnership with other like agencies.

Q95: Please clarify the distinction between subgranting funds to other recipients and contracting for services with consortium partners. Will the lead agency in a consortium be allowed to use funds through this grant to contract with other consortium members for services?

A95: Yes, the lead agency in a consortium is allowed to use funds through this grant to contract with other consortium members for services. Consortium partners are not considered excluded subcontractors for purposes of this RFA.

Q96: Can services provided by and at agency and funded through another source be offered to program participants at no cost to participants?

A96: Yes, other services may be provided to participants at no cost provided they meet the terms and conditions of the funding sources.

Q97: Can agency that is funding service be charged for ONA participants use of service, for example child care?

A97: The RFA encourages entities to support attendance at English-for-Speakers-of-Other-Languages training and other events that lead to naturalization and citizenship, so long as the costs are not under ineligible funding purposes (see RFA pg 5). Childcare, for example, is an ineligible funding purpose. All expenditures are subject to review.

Q98: Will the ONA legal counsel be responsible for preparing fee waivers and Form N-648 or would this be an expectation of the agency?

A98: Yes, naturalization application fee waivers are expected to be completed through the use of CitizenshipWorks by the ONA Opportunity Center.

Q99: Will Form N-600, Application for Citizenship Certificate, be able to be included in the total number of applications submitted to USCIS?

A99: Yes

Q100: Are consortium applications more likely to be funded than applications by a single organization? Our organization provides the entire target services identified in the RFA - are we at a disadvantage if we apply as a single organization rather than as a consortium?

A100: Contracts are not awarded by consortium or individual submission. Contracts are awarded based on total score and location.

Q101: Clarification on requirement to submit quarterly financial audited report: On page 4 under #3 regarding quarterly reports, the RFA states that the contractor will be required to submit a financial audit report on a quarterly basis. Please provide clarification on what kind of report this is. Large providers are typically asked for a copy of their certified audited financial statements once a year, which are submitted on an annual basis to funders. Is this what is being requested? If so, providers should only be required to submit this information once annually.

A101: The financial audit report should not have been included as a quarterly submission under number 3.

Q102: Budget form – indirect cost rate: In the Appendix E - Budget Summary form, there is a parenthetical notation under the indirect cost line which states “Approved Rate”. Does this mean that an applicant is required to use a federally-approved indirect cost rate? If an applicant does not have a federally-approved rate, can an applicant use its own indirect rate based on its certified financial statements and submit a copy of its estimated indirect cost rate calculation as supporting documentation?

A102: If an applicant has a federally approved indirect cost rate, then yes, they are required to apply the rate. If however, the organization has its own internal rate, they should use this rate, which will be subject to verification and approval prior to contract execution.

Q103: Budget form - Fringe rate: Is there any cap on the fringe rate?

A103: Fringe rate has no cap but must be an allowable documented expenditure applied to respective personnel salaries.

Q104: Appendix G – Application Attestation: Are applicants required to submit the Appendix G -Application Attestation along with the application? If so, this document should be included in the list of documents to be submitted with the application on page 20.

A104: Yes, each applicant is required to submit the Appendix G – Application Attestation along with the application. It should have been included in the list of required documents on page 20.

Q105: Would it be possible for the Workforce RFA to include a program in the New York City metropolitan area that provides highly successful workforce training for living-wage jobs, as well as comprehensive immigration law representation, to a large number of immigrant domestic violence victims?

A105: Please refer to the Workforce Development Q&As for this answer.

Q106: Are members of a consortium counted as one ONA Opportunity Center? For example, if a consortium consists of three CBOs, with two of those CBOs located in Manhattan and one in Queens, would that consortium need to submit two applications, even though one agency is identified as the lead agency?

A106: Regardless of the number of eligible members within a consortium, a separate application must be submitted to provide services in each eligible county. The lead applicant must be located in the eligible service area.

Q107: Is the Vendor Responsibility Questionnaire meant to be completed after the applicant is awarded a grant or prior to submission of the application?

A107: The Vendor Responsibility Questionnaire must be completed as stated in Appendix G of the application.