

NYS Department of State
Office for New Americans (ONA) Opportunity Center
Request for Applications #15-ONA-08
Questions & Answers

RFA modification (Q8) on page 10, paragraph 2

Correction: ONA Opportunity Center staff will not be expected to provide training on entrepreneurship services.

RFA modifications (Q5, Q27, Q42, Q43, Q92) on pages 4, 20, 25

Correction: In Q3, a minimum of 40 clients should be registered, not 45 as stated on pages 20 and 25.

RFA modification (Q11, Q35, Q51), on pages 20, 21, 26

Correction: The first line “Total number of classes per client per quarter” may be listed as either the total number of classes offered weekly or the total number of classes offered over the full quarter, providing that the line “Total Hours Offered (Total instruction hours offered in the quarter + total number of supplemental hours offered in the quarter)” is calculated as the total number of hours offered quarterly.

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 #15-ONA-08 issued on July 17, 2015. In the event of any conflict between the RFA and these responses, the requirements or information contained in these responses will prevail.

Q1: We have assisted several clients under the current ONA grant in preparing form N-600 and some of them have been fairly complex cases. Additionally, many refugees who do not have birth certificates have been unable to obtain US passports to show they derived citizenship and must rely on the N-600 to get that proof. Can preparing N-600s be included in the required 125 completed applications?

A1: Only N-600 applications that are completed by the Opportunity Center and approved by the Legal Counsel can be included in the required 125 completed applications.

Q2: Our agency is the Community Action Agency serving primarily Columbia County, NY. We have a 15 year history of serving our immigrant population and would like to apply to host a regional Office of New Americans Opportunity Center. On page 4 – Appendix A of the ONA RFA you provide a list of

eligible counties. Columbia County is not on this list. Would the Opportunity Center need to actually be located in one of the eligible counties? Our vision includes a regional center that would include communities in the Mid-Hudson Valley as well as the Capital Region.

A2: The Opportunity Center would need to have a physical presence in one of the eligible counties listed in Appendix A. However, the site may be run by a qualified organization with central offices located in a different location provided the organization meets the criteria for eligibility listed in the RFA.

Q3: I am the Executive Director of a newly formed not for profit agency in New York. We are interested in applying for funding through the Office for New Americans Opportunity Center Program; however, our application for 501c3 status is still pending. I understand that is a requirement for applying. Our parent organization, is our fiscal sponsor, pursuant to a fiscal sponsorship agreement and is able and willing to apply on our behalf. I am writing to inquire whether that arrangement would be acceptable. I wanted to confirm our eligibility before we begin the application process. Our agency would be the agency performing the legal work on the grant in partnership with another community based organization.

A3: The fiscal sponsor must be a not-for-profit organization with 501(c)(3) IRS status, eligible to apply or to be part of a consortium. Community-based organization shall mean any organization incorporated for the purpose of providing services or other assistance to economically or socially disadvantaged persons within its designated community and, have been in continued existence for at least three (3) years.

Any not-for-profit organization with 501(c)(3) IRS status is eligible to apply or to be part of a consortium. The 501(c)(3) status must be in place at the time services are delivered. Further requirements for service provision by the lead contractor are set forth in the RFA.

Q4: On page 4, paragraph 2, are weekend class offerings required?

A4: While weekend classes are not required, there is an expectation that the classes should best accommodate the diverse work schedules of the New Americans in their communities.

Q5: On page 4, paragraph 3, is the requirement for students reaching 100 hours a minimum of 45 students in Quarters 1, 2, and 4 and 30 in Quarter 3? (There appears to be a typo.)

A5: Due to a slower registration period in the summer, the requirements for Q3 are lower than other quarters.

At the beginning of Quarter 1 (Jan – March), Quarter 2 (April – June), and Quarter 4 (October – December), each organization should register a cohort of sixty (60) clients. **At the beginning of the summer quarter, Quarter 3, each organization should register a cohort of forty (40) clients**, for a total of 220 registered clients across four (4) quarters per year. Of these registered clients, each ONA Opportunity Center should ensure that 45 clients in Quarters 1, 2, and 4, and 30 clients in Quarter 3 (75% of clients in each cohort), at a minimum, will complete the entire one hundred (100) hours by the end of the quarter.

Q6: On page 4, paragraph 4, can clients who have achieved 100 hours be counted anew even if they don't advance to higher levels of proficiency?

A6: Yes. At the end of each quarter all students' hours will be considered as completed. If a student wishes to continue to the next quarter, their hours will then begin anew and their proficiency measured.

Q7: On page 7, paragraph 2, can you please confirm that the new annual total of applications to USCIS is 125? From our experience running two ONA Opportunity Centers, this number seems high.

A7: The annual total number of applications is 125 which includes citizenship applications AND deferred action applications.

Q8: On page 10, paragraph 2, is the language correct that ONA Opportunity Center staff will be expected to provide training on entrepreneurship services? If so, can you please clarify what kind of support/training will be provided to do so effectively?

A8: No, ONA Opportunity Center staff will not be expected to provide training on entrepreneurship services. Entrepreneurship training seminars will be provided to ONA Opportunity Center clients by an outside entity at no cost to the ONA Opportunity Center host organization. In anticipation of these seminars, ONA Opportunity Center staff will be provided training on entrepreneurship services in New York State and how to recognize entrepreneurial potential at no cost to the ONA Opportunity Center host organization. Similar to clients training, the staff training will be provided by an outside entity determined by the NYS Office for New Americans.

Q9: On page 10, paragraph 3, if an organization is not a lead organization of a consortium, is it required to pursue BIA accreditation? If so, what happens if an organization is unable to achieve accreditation?

A9: An ONA Opportunity Center is required to pursue BIA accreditation, as without BIA accreditation it is difficult to meet the annual goals. The NYS Office for New Americans will provide BIA training to all Opportunity Center agencies free of charge. If an Opportunity Center pursues accreditation, but is not successful, they may be allowed to remain in the network contingent on overall performance. If the organization is a consortium member that is not providing Naturalization and Deferred Action Assistance and Legal Consultation Services under the NYS Office for New Americans grant, they are not required to pursue BIA accreditation, but may receive training if interested.

Q10: On page 18, is there a page limit for the narrative?

A10: There is no page limit for the narrative.

Q11: On page 20/21, is the first entry in the ESOL Program Plan supposed to be "Total number of classes per client per quarter" as written, or should it be per week? There's a note stating that it's 4 classes a week, but we don't want any confusion on the form we submit.

A11: The first line "Total number of classes per client per quarter" may be listed as either the total number of classes offered weekly or the total number of classes offered over the full quarter, providing that the line "Total Hours Offered (Total instruction hours offered in the quarter + total number of supplemental hours offered in the quarter)" is calculated as the total number of hours offered quarterly.

Q12: We are a 501 (c)(3) non-profit, and if we were to apply for the Grant as the lead agency, would we be able to sub-contract with an organization that is not a non-profit for the ESOL portion? There is a very reputable organization in our community that offers excellent ESOL classes with a strong curriculum and have been wanting to find a way to serve the population this Grant focuses on for some time now. After reading the Request for Applications it was not clear to us whether we would be able to subcontract with this business for the ESOL portion for our application as they are not a non-profit. On Page 3 in Section B Consortium Policy, 1-vi. It says that the lead Fiscal Agency: Must be responsible for the performance of any services provided by the partners, consultants, or other organizations and must coordinate how each plan to participate. In addition, the lead applicant/fiscal agent is PROHIBITED from sub-granting funds to other recipients. The fiscal agent is permitted to contract for services with other consortium partners or consultants to provide services that the fiscal agent cannot provide itself.

A12: A not-for-profit ESOL provider would be allowed as a consortium member providing ESOL services under the supervision of the lead agency, provided that the consortium member has 501(c)(3) IRS status.

Q13: Page 1 refers to dedicated space and multiple sites. May the proposer have a single dedicated site open during regular business hours complemented by other sites that are open once or twice a month? The idea is that the other sites would operate in other neighborhoods and during non-standard business hours in order to reach eligible New Americans who find the location or operating hours of the dedicated space inconvenient.

A13: This scenario would be acceptable under this grant.

Q14: Pages 2-3 claim that this RFA complements 2 simultaneously released RFAs. I have checked the link provided and could not find ONA Board of Immigration Appeals Trainer RFA. Where is this RFA? Did NYS decide not to release it?

A14: The NYS Office for New Americans Board of Immigration Appeals Trainer RFA will be released shortly.

Q15: Page 12 regarding the amount of funding is not very clear. Is \$175, 000 the maximum amount per Opportunity Center that ONA will consider? Right now it seems to say that is the total available for all Opportunity Centers, not each Opportunity Center.

A15: \$175,000 is the maximum amount per ONA Opportunity Center per year.

Q16: With respect to the moneys available to assist low-income, non-fee waiver eligible clients, does ONA define who is considered "low-income?"

A16: Generally, these funds are envisioned to assist individuals who are not eligible for fee waivers due to income and below about 400% of the federal poverty level.

Q17: Can ESOL services be delivered in three semesters per year, rather than quarterly, as long as the reporting is delivered quarterly?

A17: No. The NYS Office for New Americans is a cohort based model framed around the delivery of services in four semesters per year.

Q18: How are you defining "progress" relative to ESOL instruction?

A18: Progress is determined by the positive change demonstrated when comparing a clients' pre-test conducted at the beginning of the semester with his/her post-test conducted at the end.

Q19: Will ONA allow grantees to provide levels of ESOL that meet local demand and pre-test levels, so that if there are no advanced speakers in a quarter we will not be required to offer advanced ESOL that quarter?

A19: All ONA Opportunity Centers should be prepared and have the capacity to teach ESOL courses as outlined in the RFA, including advanced ESOL. ONA Opportunity Center host organizations must demonstrate strong outreach to relevant populations for each level of ESOL (i.e. the high-skilled non-English speaking population, etc). If after this dedicated outreach and technical assistance from the NYS Office for New Americans with said outreach results in pre-tests in a particular quarter indicate that there is no interest for an advanced class in that quarter, the NYS Office for New Americans may issue a waiver to the agency at that time. In such cases, the ONA Opportunity Center would increase the number of offerings on the other levels of English so the total number of clients served in the quarter remains unchanged.

Q20: Is it ONA's expectation that the same 60 persons will be served from cohort to cohort, or that a new group of 60 persons will comprise each cohort?

A20: Every quarter is a new cohort that may consist of either new students or students returning from previous cohorts.

Q21: Can you explain the differences between a "partner," a "subcontractor," "non-consortium organizations" and "consortium members"? Which ones should be included in the MOU? Which must provide letters of support? Which must provide letters of intent? Which can be paid with grant funds?

A21: Consortium member organizations are not-for-profit organizations with 501(c)(3) IRS status providing a key service **on behalf** of the lead agency. If an Applicant will be partnering with a Consortium member, the Applicant must submit an MOU, signed by the Applicant and proposed Consortium

Member(s), outlining services to be delivered, proposed payment structure, and proposed service delivery dates. Consortium members may be paid with grant funds.

Community Partner organizations are community organizations that will partner with the lead agency to **enhance** the services offered at the Opportunity Center. As part of this application, the applicant must attach at least two (2) brief letters of support from community partners, expressing their support for the application and setting forth the commitment the organization is making to the application.

Subcontractors consist of outside organizations to which the lead agency provides funding. This may include consortium members, consultants, and organizations from which the lead agency purchases supplies. Once the agency is awarded a contract, they will have to report all spending to subcontractors as part of the M/WBE reporting requirements. Subcontractors may be paid with grant funds.

Q22: What is your expectation for services for deferred action given the federal injunction on DAPA and “expanded” DACA?

A22: ONA expects selected ONA Opportunity Centers to provide Deferred Action for Childhood Arrivals (DACA) assistance. These applications are counted towards the deliverables set forth in the RFA.

President Obama proposed an expansion of the DACA program and new associated program for undocumented parents as part of a series of changes to federal immigration policy the federal government is calling the President’s Executive Action on Immigration. The expansion and the new program are under a federal injunction. It is expected that these new programs would be covered under this deliverable if the courts decide they move forward.

Q23: Is your goal of 125 applications inclusive of both naturalization and deferred action?

A23: Yes, The goal of 125 applications includes naturalization citizenship and deferred action applications.

Q24: While our service area has more than 30% foreign-born population, it may not have enough lawful permanent residents to meet your goal of 125 applications each year. Is there any flexibility on this goal? Can we tie the number of completed applications proportionately to the number of LPR among the population served?

A24: No. The goal of 125 applications includes citizenships applications and deferred action applications.

Q25: Can the volunteer coordinator be provided in-kind?

A25: Yes. The volunteer coordinator can be provided in-kind.

Q26: Can a portion of the ESOL be provided in-kind?

A26: Yes. A portion of the ESOL can be provided in-kind provided that the clients are not counted towards a separate grant.

Q27: Must we register a minimum of 60 students in ESOL in Q1, Q2, and Q4 and a minimum of 45 students in Q3, or can we register varying numbers per quarter as long as we serve 225 annually?

A27: Each cohort should adhere to the registration numbers stipulated in the RFA. At the beginning of Quarter 1 (Jan – March), Quarter 2 (April – June), and Quarter 4 (October – December), each organization should register a cohort of sixty (60) clients. At the beginning of the summer quarter, Quarter 3, each organization should register a cohort of forty (40) clients, for a total of 220 registered clients across four (4) quarters per year. Of these registered clients, each ONA Opportunity Center should ensure that 45 clients in Quarters 1, 2, and 4, and 30 clients in Quarter 3 (75% of clients in each cohort), at a minimum, will complete the entire one hundred (100) hours by the end of the quarter.

The expectation is that an agency will meet the performance criteria each or quarter, or corrective action may be pursued.

Q28: Does ONA have a preferred ESOL curriculum?

A28: No. While the NYS Office for New Americans does not have a preferred ESOL curriculum, classroom instruction should be contextualized to focus on instruction in language necessary in the workplace and U.S civics.

Q29: Our facility maximizes space constraints by using space flexibly, so that tonight's classroom might be tomorrow's workshop space or Thursday's computer lab - using computers in a cart. Would this arrangement work for ONA, or must the space be dedicated to only one specific function?

A29: Yes, the above arrangement would work for the purposes of this grant.

Q30: Is there a page limit on the narrative or on the entire package?

A30: Yes, there is no page limit on the narrative or on the entire package.

Q31: Can we replicate the charts and forms in the RFA or, alternately, can you provide excel, MS word or fillable pdf versions of required charts and forms?

A31: MS word versions of charts and forms in the RFA will be posted website.

Q32: The RFA lists quarterly targets for ESOL student enrollment and advancement rates. Must a grantee hit the target each quarter, or could the grantee miss the target during a particular quarter and make up the deficit later on in the year?

A32: Each cohort should adhere to the registration numbers stipulated in the RFA. If a grantee misses the target during a particular quarter, they cannot make up the deficit later on in the year.

While we require a grantee hit the quarterly target, we anticipate the possibility that start up staffing and work may affect the programs and services in the first quarter of 2016.

Q33: Are start-up costs allowable during the first year such as for signage?

A33: Start-up costs are allowable, provided that they fit within the list of eligible expenditures and provide support to the program. Signs will be provided free of charge by the NYS Office for New Americans to the selected ONA Opportunity Centers.

Q34: The RFA states that the Opportunity Center must be branded with ONA signage. Could you please specify any specific requirements for this signage

A34: ONA will provide signs to each agency free of charge. Signs should be prominently placed throughout the agency for maximum visibility.

Q35: In completing the chart on page 26, can you explain what you mean by total # of classes per client per quarter? Is that the number of classes offered in the level relevant to the client? For example, 2 classes per week of ESOL Level 1 x 10 weeks, or 20? Or is that the total number of classes by level offered? For example, ESOL Levels 1-4, or 4?

A35: The first line "Total number of classes per client per quarter" may be listed as either the total number of classes offered weekly or the total number of classes offered over the full quarter, providing that the line "Total Hours Offered (Total instruction hours offered in the quarter + total number of supplemental hours offered in the quarter)" is calculated as the total number of hours offered quarterly.

Q36: What happens if one of the 125 submitted U.S. Citizenship and Immigration Services applications gets denied and the applicant is denied citizenship? Will the applicant be targeted for deportation?

A36: ONA is not involved in US Citizenship and Immigration Services decisions, however there is a reasonable expectation that the applications submitted to US Citizenship and Immigration Services will be accepted. All citizenship applications are required to be reviewed by ONA Legal Counsels prior to submission.

Q37: Can we submit the application anytime between now and Sept 4th the due Date?

A37: Yes. The application can be submitted anytime between now and the September 4 at 4:00 pm.

Q38: Can grant money help to pay salaries for the staff working in the new proposed new American community centers? (ie. secretarial, director, etc.)

A38: Yes. These funds may be used to pay salaries for staff working in Office for New Americans Opportunity Center. Prior to reimbursement, all budgets must be approved by the Department of State.

Q39: How is grant money distributed? (ie. time frame breakdown, Receipt reimbursement, lump sum? etc)

A39: At the beginning of the grant year, each agency will receive 25% of the funding as an advance which will be recouped each in the first three quarters. Thirty days after the end of each quarter, agencies must submit properly execute vouchers and supporting documents and will be reimbursed based on agency approved budget and proof of payment documentation such as invoices and receipts submitted to ONA.

Q40: Are there specific limitations on grant monies being spent, on building needs (i.e. utilities, maintenance, classroom dividers for ESL training Signage, etc.) Is there an existing list of items not covered, etc.

A40: Yes, the list of items not covered under this grant can be found on page 32 of the RFA, under section XI Use of Funds, item b. "Ineligible Funding Purposes".

Q41: Is there a specific form for reporting our activities, programs, progress, etc, if so where can it be found?

A41: Yes. At the beginning of the grant, the ONA will provide each grantee with a specific form for reporting activities and progress to be submitted quarterly.

Q42: Quarterly Cohort Typo: On pages 4 and 14, the RFA states that Quarters 1, 2, and 4 should have cohorts of 60 clients and Quarter 3 should have 40 clients. On page 20, the RFA says that 45 clients should be registered for Q3. Which number is correct?

A42: In Q3, a minimum of 40 clients should be registered, not 45 as stated on page #20.

Q43: Quarterly Cohort Caps: On Page 4, the RFA says that Quarter 3 will require fewer clients to be registered over the summer, however, we anticipate registration in Quarter 1 to be the most challenging due to inclement weather and holidays, including the Lunar New Year. What are the consequences should we have fewer registered clients in one quarter, but are able to exceed the minimum registration cap in Quarter 3 or in another quarter? Are there maximum class sizes?

A43: Each cohort should adhere to the registration numbers stipulated in the RFA. At the beginning of Quarter 1 (Jan – March), Quarter 2 (April – June), and Quarter 4 (October – December), each organization should register a cohort of sixty (60) clients. At the beginning of the summer quarter, Quarter 3, each organization should register a cohort of forty (40) clients, for a total of 220 registered clients across four (4) quarters per year. Of these registered clients, each ONA Opportunity Center should ensure that 45 clients in Quarters 1, 2, and 4, and 30 clients in Quarter 3 (75% of clients in each cohort), at a minimum, will complete the entire one hundred (100) hours by the end of the quarter.

The expectation is that an agency will meet the performance criteria each or quarter, or corrective action may be pursued.

There are no maximum class sizes, however, as a cohort model, ONA expects that each agency be able to retain a majority of the students registered in a quarter.

Q44: Allocation for Retention Activities: On page 6, the listed retention activities include funding an additional ESOL instructor. Can the retention allocation be used to fund additional hours for the regular classroom instructor as long as those hours are outside of the regularly scheduled class meeting times (i.e. for make-up or conversation classes that fall outside of the normal class schedule)?

A44: Client retention activities are activities to support client completion of 100 hours of ESOL instruction each quarter. Client retention activities may include but are not limited to: awards/certificates, reasonable public transportation stipends, field trips, incentives such as gift cards, and may be used to fund an additional ESOL instructor. With respect to the ESOL instructor, this may include additional hours as your question has specified.

Q45: Naturalization Assistance: On Page 8, the RFA states that ONA Opportunity Centers will follow up and document whether clients took the exam, how they performed, and whether they became US Citizens. For how long does this follow up need to be conducted? One additional Quarter or longer?

A45: The follow-up should be conducted as long as the agency hosts the ONA Opportunity Center.

Q46: Regarding blended learning models which incorporate technology into instruction, must the use of technology take place within the formal classroom during the required 60 hours of instruction? Or can the use of technology be assigned as “homework” and done outside of the classroom? If the use of technology can happen outside of the classroom, is it okay to have clients self-report the amount of time they spent with the assignment?

A46: While ONA suggests incorporating technology into the formal classroom setting, there may be other models proposed (language lab setting, tablet computer use after formal class, etc). Technology learning may also be assigned as homework, provided that there is a clear connection between the classroom instruction and the homework assigned. Clients may self-report the amount of time spent with the assignment, provided that the agency has a methodology to confirm if this self-assessment is accurate.

Each ONA Opportunity Center will be required to provide one hundred (100) hours of ESOL training to each client per quarter, of which 60 hours, at a minimum, should be dedicated to teacher-led classroom instruction.

Q47: Must all naturalization assistance and legal services be provided by ONA Legal Counsels or can the lead applicant partner with legal service non-profits to provide services beyond what’s required in the RFP?

A47: ONA Legal Counsels must be present for all Citizenship Drives and Consultation Days. Other legal services may be provided but cannot be funded with this grant.

Q48: Is there a page limit for the narrative?

A48: No, There is no page limit for the narrative.

Q49: Must \$12,500 be allocated to client retention?

A49: Yes, \$12,500 must be allocated to client retention activities.

Q50: Are indirect costs allowed?

A50: Indirect costs are allowed provided that the agency has an approved Federal Indirect Cost rate.

Q51: In Attachment 4 “ESOL Program Plan,” should the total number of classes per client per quarter be counted as the total number of weekly classes or the total number over the full quarter? The example provided by ONA (below) “assumes a 10 week quarter (4 classes a week * 2 hours per class* 10 weeks of classes),” therefore showing the weekly number of classes (4) instead of the quarterly (40).

A51: The first line “Total number of classes per client per quarter” may be listed as either the total number of classes offered weekly or the total number of classes offered over the full quarter, providing that the line “Total Hours Offered (Total instruction hours offered in the quarter + total number of supplemental hours offered in the quarter) Total of instruction hours offered in the quarter” is calculated as the total number of hours offered quarterly.

Each ONA Opportunity Center will be required to provide one hundred (100) hours of ESOL training to each client per quarter, of which 60 hours, at a minimum, should be dedicated to teacher-led classroom instruction.

Q52: Are the Citizenship Drives (2 per year) and immigration law consultations (10 days per year) only offered to people who have enrolled in Opportunity Center programming?

A52: No. Citizenship Drives and Immigration Law Consultations should be offered to any client in the community with need for these services.

Q53: Are the 10-20 people who attend the “Starting Your Own Business” and “Growing Your Own Business” seminars, as well as the attendees of the 9 required immigrant assistance workshops, required to also be clients attending 100 hours of programming each quarter?

A53: No. “Starting Your Own Business” seminars and “Growing Your Own Business” seminars and the other workshops should be offered to any New American in the community with need for these services.

Q54: What if we pursue BIA accreditation and for whatever reason don't receive it? Will that make us no longer eligible for renewed funding?

A54: If an agency pursues BIA accreditation, but does not receive it, they will be able to remain in the ONA network and be eligible for renewed funding contingent on overall performance.

Q55: Does participation in workshops, time spent working on CitizenshipWorks software, etc. count towards the 100 hours of ESOL training required for each client? Must all activities that count towards 100 hours take place within the Opportunity Center? Would a client also taking ESOL classes at a different location run by the host organization be able to count those hours towards the required 100 hours?

A55: Participation in other ONA required services such as workshops, Entrepreneurial seminars, and naturalization assistance cannot be counted towards 100 hours of ESOL instruction. If there are activities taking place outside the ESOL organization that, as part of the ESOL curriculum, enhances the in-class ESOL learning experience, it may be counted.

Q56: Will an application postmarked (with receipt as proof) by Sept. 4 by 4pm be acceptable?

A56: The application must be **received** by the Department of State by September 4th at 4pm. Under certain circumstances (such as the postal service losing the application despite the applicant sending it in with ample time before the deadline), the Department of State may still consider the application if provided with compelling proof.

Q57: Is there an advantage or extra points awarded for applying as a consortium?

A57: No. There is no advantage or extra points awarded for applying as a consortium.

Q58: On page 3 vi. "...the lead applicant/fiscal agent is PROHIBITED from sub-granting funds to other recipients. The fiscal agent is permitted to contract services with other consortium partners or consultants to provide services that the fiscal agent cannot provide itself." Please clarify "recipients"? Is that in reference to the other consortium partners?

A58: "Recipients" includes organizations to whom the lead fiscal agency has sub-contracted services. Under this grant, consortium members providing key services under the supervision of the lead agency are allowed, provided that the consortium member has 501(c)(3) IRS status and that they have been approved by the NYS Office for New Americans prior to service delivery.

Q59: First statement prohibits subcontracting, yet the second statement permits it under certain circumstances. So, is the fiscal agent only allowed to subcontract for services that it itself cannot provide? Is this the only circumstance? Or, as long as 25% of direct programming (minimum level) is provided by the fiscal agent, the other 75% can be subcontracted out regardless of whether the fiscal agent can provide the service itself?

A59: The fiscal agent is allowed to subcontract for key services to consortium members only under the supervision of the lead agency, provided that the consortium member has 501(c)(3) IRS status, and that they have been approved by the NYS Office for New Americans prior to service delivery. This is regardless of whether or not the lead agency can deliver the services or not.

Q60: Can you engage a subcontractor to complete some portions of the services without officially forming a consortium? If so, will a letter of intent suffice for the proposed services?

A60: No, The only instance where subcontracting is allowed is with consortium members who have been pre-approved by the NYS Office for New Americans.

Q61: On page 107, Form D M/WBE Utilization Form, "6. IF UNABLE TO FULLY MEET THE MBE AND WBE GOALS SET FORTH IN THE CONTRACT, OFFEROR MUST SUBMIT A REQUEST FOR WAIVER FORM E.": How do we submit a request for Waiver Form E?

A61: If awarded the grant, the agency will have the opportunity to submit a waiver request if M/WBE utilization goals are on attainable.

Q62: Where can obtain/download a copy of Waiver Form E?

A62: If a waiver is needed, it will be provided at the time awards are made.

Q63: If applying for the waiver, do you just leave blank pages 105-107 "Appendix H: M/WBE Utilization Forms" and just submit Waiver Form E?

A63: Application for a waiver will occur during the contract process. It is not a guarantee that a waiver will be granted. As such, an applicant should present a proposed M/WBE plan with their proposal.

Q64: What are some of the permissible reasons to claim a waiver exemption? For instance, sole-source goods or services have been accepted in the past. Please elaborate with a list of allowable waiver exemptions.

A64: 30% of the total contract value is subject to M/WBE, with the following exceptions:

- Personal services (i.e. payments to staff for labor)
- Travel reimbursements
- Utilities
- OGS centralized services
- Sole source contracts
- Postage
- Telephones
- Staff benefits

- Operating transfers
- Certain rentals and repairs
- Special departmental charges (i.e. unemployment insurance and tuition reimbursement)

Waiver exemptions may be granted in situations in which the agency has documented good faith efforts to engage with M/WBE vendors, but was unable to find an adequate service provider.

Q65: On page 106 under M/WBE Contract Goals, why is there a "20%"? Isn't the overall minimum goal 30%

A65: There is a 30% minimum goal for M/WBE.

Q66: Is there an advantage or extra points awarded for securing in-kind contributions?

A66: No. There is no advantage or extra points awarded for securing in-kind contributions.

Q67: Is there an advantage or priority or preference given to the 27 former/existing ONA Opportunity Center contractors?

A67: No. All applicants will be scored based on a combination of prior ESOL and naturalization service delivery regardless of their status as a prior Opportunity Center contractor.

Q68: If at all possible, can you please accommodate a deadline extension due to the upcoming Labor Day holiday?

A68: No. A deadline extension cannot be granted at this time. The application must be received by the Department of State by September 4th at 4pm. Under certain circumstances (such as the postal service losing the application despite the applicant sending it in with ample time before the deadline), the Department of State may still consider the application if given provided with compelling proof.

Q69: For the community partnerships and resources requirement (C5), do we have to submit formal linkage or partnership agreements, or will a description suffice?

A69: For community partnerships, applicants must attach at least two (2) brief letters of support from community partners expressing their support for the application and setting forth the commitment the organization is making to the application. Letters must be submitted on the proposed partner organization's letterhead. The letters of support should be submitted with the application as Attachment 7: Letters of Support.

Q70: Is an MS Word version of the RFA available so we can fill in the attachment forms using MS Word?

A70: MS word versions of charts and forms in the RFA will be posted website.

Q71: Our understanding from the RFA is that each ONA will be required to provide all five of the "central services" listed on page 3. Is this correct?

A71: Yes, each Opportunity Center member will be required to provide all five of the “central services” listed on page 3. This can be done directly or via an agreement with a consortium member.

Q72: Is it alright for some elements of the proposed program to be held in facilities other than those owned by the lead applicant?

A72: Yes. Some elements of the proposed program may be held in facilities other than those owned by the lead applicant, provided it has been pre-approved by the NYS Office for New Americans.

Q73: Is there a page limit or anticipated page range for the narrative sections of the application?

A73: There is no page limit for the narrative.

Q74: In addition to Letters of Support from community partners, will you accept and review Letters of Support from clients and/or politicians?

A74: No. Letters of support should be only from community partners with whom the applicant will be partnering. Letters should express their support for the application and setting forth the commitment the organization is making to the application.

Q75: Could an alternative assessment tool to BEST PLUS be used, particularly for adult ELLs with pre-beginner English/literacy levels? The attached PDF is from the Department of Education of the State of Arizona and could potentially be Albany’s template for an in-house assessment tool. It includes guidelines for listening, speaking, reading, and writing proficiency standards on pgs. 41-89.

A75: Yes. An alternative assessment tool to BEST PLUS may be proposed and should be described in the application.

Q76: Clarification of “other recipients” and the role of the fiscal agent: Please clarify what is meant by “other recipients” on page 3 of the RFA and how this definition contrasts to what is meant by “consortium partners”. Under section “c”, roman numeral “v.”, it is stated that the lead fiscal agent must not “act as a flow-through for grant funds to pass to other recipients”, while under roman numeral “vi.”, it is stated that the lead fiscal agent “is PROHIBITED from sub-granting funds to other recipients”, however the fiscal agent “is permitted to contract for services with other consortium partners or consultants to provide services that the fiscal agent cannot provide itself”. Does “other recipients” refer to organizations that are not “consortium partners” with which an MOU has been executed by the lead fiscal agent? Our current arrangement involves a subcontract with another provider to offer immigration legal services while the lead fiscal agent offers the ESOL component. Will this arrangement continue to be permissible under this RFA?

A76: Recipients would include organizations to whom the lead fiscal agency has sub-contracted services. Under this grant, consortium members providing key services under the supervision of the lead agency are allowed, provided that the consortium member has 501(c)(3) IRS status and that they have been approved by the NYS Office for New Americans prior to service delivery.

The proposal mentioned above would be acceptable as the immigration legal services provider would be considered a consortium member.

Q77: Clarification of prohibition against carrying hours over from one quarter to another by ESOL clients: Please clarify on page 4 of the RFA why ESOL clients are not allowed to carry over accrued hours from one quarter to another. Why is this being restricted? If a student does not complete 100 hours but wants to continue, does this mean we will not be able to count the student in the next semester? What if they achieve higher proficiency or are more advanced before the 100 hours? Paragraph 4 on page 4 also states “For example, a client completing the required classes in Q1, Q2, Q4 would count as 3 clients, one per quarter where they have met the goal. We assume this also counts for Q3 but it is not mentioned. Please confirm?

A77: ONA ESOL is cohort based and as such, hours are measured by what was completed in a quarter. If a student does not complete the total number of hours in a quarter they may continue with ESOL registration in the next quarter, but will be counted as a new registrant and their hours would begin anew. If, during the quarter, proficiency improves, a student may be moved to a higher level class and the hours would carry over for the remainder of the quarter.

Students are encouraged to continue in subsequent quarters, regardless of whether or not they complete 100 hours in a previous quarter.

Q78: Further clarification on use of ESOL hours: Considering the prohibition of carrying over accrued hours, can all ESOL registrants be re-registered at the start of a new quarter (both those who have completed the 100 hours and those who have not and would begin again at 0 hours? Additionally, within the second paragraph on page 4, states “Each ONA OC will provide ESOL instruction at a variety of levels, with classes scheduled to best accommodate the diverse work schedules of the NA communities by offering day, night, and weekend classes. Does this mean we are contractually obligated to offer weekend classes or is it just encouraged?

A78: At the beginning of each quarter, ESOL registrants may be re-registered and their hours would start again. While weekend classes are not required, there is an expectation that the classes should best accommodate the diverse work schedules of the New Americans in their communities.

Q79: Clarification on ESOL testing: Please clarify what is meant on page 5 by “Additionally, all clients will be tested at the end of each quarter, upon completion of a minimum of 100 instructional hours”. Are you referring to “all clients” or those who have completed “100 instructional hours” that need to be post-tested? Can a post-test also count as the client’s pre-test for the following quarter (assuming they re-register)?

A79: At the end of the quarter, all students who complete 100 instructional hours will be required to be post-tested. If the student continues into the next quarter, this can also be counted as the pre-test for that quarter.

Q80: Clarification on ESOL curriculum: Page 4 paragraph 2 indicates that the “curriculum should also be contextualized with a focus on instruction in language necessary in the workplace and U.S. civics”. Can you please clarify or give us a list of other areas deemed acceptable if the focus is not necessarily

on U.S. civics? For example, one of our primary partners recently shifted its focus toward academic readiness.

A80: Based on the needs of the New Americans in their communities, the agency may determine what other areas are necessary for their ESOL curriculum, provided there is a focus on language necessary in the workplace and US civics.

Q81: Clarification on ESOL Participant Assessment and Follow-Up: Page 5 bottom paragraph indicates that "If an alternative evaluation method is proposed, it must be described in the application". We are currently approved to use DCC's pre-test under our current contract and would like clarification on whether we can continue using that test if awarded.

A81: The DCC assessment tool maybe proposed and should be described in the application.

Q82: Clarification of requirement that all citizenship applications be reviewed and approved by ONA Legal Counsel, noted on pages 7 and 8: Our current arrangement involves our legal staff providing consultations and application assistance under the supervision of our staff attorneys and BIA accredited representatives. Generally, referrals to ONA Legal Counsel occur after our staff conducts an initial consultation and determines that the immigrant has a particularly complicated case that we do not have immediate capacity to handle (removal proceedings, affirmative asylum). Our staff collaborates with ONA Legal Counsel during citizenship drives and other ONA events but the citizenship applications are NOT reviewed by ONA Legal Counsel because our staff attorneys and BIA Accredited Representatives review and enter G-28s (Notice of Entry of Appearance of Attorney/Representative) on every one of our filings. We have found that representing all clients with G-28s enables us to efficiently assist them with questions about biometrics, fee waiver denials, Requests for Evidence, preparation for the citizenship exam, and representation at the naturalization interview on cases that present certain issues (for example, disability waivers, arrest records, etc.). This is because USCIS sends us, as the legal representatives, copies of all approvals, notices, and appointments related to the case. This also makes it easy for us to track the final outcome of the case, something which is the new RFA does require. Would this arrangement continue to be permissible under this RFA? The requirement as noted on pages 7 and 8 is also inconsistent with those outlined on pages 14 and 15 which state that ONA Opportunity Centers may use a BIA accredited representative or other competent legal counsel within the ONA Opportunity Center to assist clients. Additionally, on pages 14 and 15, there are no documentation requirements noted to demonstrate that ONA Legal Counsel has reviewed and approved a given application, which is inconsistent with the requirements on pages 7 and 8 for ONA Legal Counsel to review and approve all citizenship applications. Please clarify.

A82: All ONA Legal Counsels must review and approve all applications completed by Opportunity Center BIA accredited repetitive or legal counsel funded under the ONA grant. If the ONA Legal Counsel assigned to the agency analyzes the process for reviewing citizenship applications and feels confident with the agency's abilities, ONA may grant a waiver to the agency so that citizenship applications reviewed by agency attorneys and BIA accredited representatives do not need final approval from the ONA Legal Counsel.

Q83: Clarification of requirement to use Citizenship Works: Our current arrangement involves the use of our immigration case management system, LawLogix, to complete citizenship and other immigration applications, and to track the status of these applications, prepare internal and external reports, prepare other immigration-related forms for the same client, etc. Is it permissible for our staff to continue using our LawLogix system to produce the citizenship application while having our volunteers use Citizenship Works to screen potential citizenship applicants and present the screening results to our staff for consideration?

A83: No. CitizenshipWorks will be required to be used at the agency.

Q84: Clarification on the role of volunteers described on page 9: Please clarify how ONA intends the Opportunity Centers to utilize volunteers under this RFA with respect to the naturalization assistance component. Is the role of the volunteer only to screen clients for citizenship eligibility, or are volunteers required to perform other responsibilities?

A84: Each agency should assess the competencies of their volunteers and assign them roles as appropriate to their agency and within the limits of the law.

Q85: Clarification on requirement to conduct SBDC surveys and provide training: Please clarify the expectation for ONA Opportunity Centers to conduct SBDC surveys, noted on page 10. Are these surveys already developed by SBDC or are these surveys that Opportunity Centers would be required to develop independently? Please also clarify what the expectation is for ONA Opportunity Center staff to conduct trainings on entrepreneurship in New York State, and what role SBDC would have in this regard. Would SBDC be leading these trainings, with Opportunity Center staff hosting the training by providing space, logistical coordination and administrative support?

A85: Surveys should be created by the Opportunity Centers. SBDC trainings will be conducted by the local SBDC center with the Opportunity Center hosting the training by providing space, logistical coordination, administrative support, and client outreach.

Q86: Clarification on "Access to Additional Opportunities", on page 10: Is it expected for Opportunity Centers to refer clients to One-Stop Centers and other organizations to access workforce training and other services? If so, is it expected that the partnerships represent simple referral arrangements, or are there other requirements envisioned to demonstrate an ongoing relationship between the organizations?

A86: The Opportunity Center relationship with community partnerships may include, but are not limited to referrals. ONA Opportunity Centers should work with nearby New York Department of Labor One-Stop Centers and link new Americans to job training, interview skills training, resume writing workshops, and professional networking opportunities. These services may be hosted on-site.

Q87: Clarification on use of funds for ESOL training, on page 6: Is it permissible to use ONA funds other than instructor salaries, such as purchasing ESOL materials, workbooks, pre- and post-tests, etc?

A87: Funds for classroom materials can come from the \$150,000 base budget.

The \$12,500 in student retention funds cannot be spent on ESOL materials, workbooks, pre-and post-tests, as the funds should be used for activities that directly impact student retention.

Q88: Clarification of documentation requirements for naturalization and deferred application process, on page 15: Please clarify the requirement to document “the associated number of hours of assistance received”. Is this per case, or per staff, or per volunteer? How should this be documented? If by staff or volunteer, is it expected that contractors will submit timesheets to document these hours? What should this documentation include?

A88: The documentation should be tracked per case. It is up to each agency to determine how to collect this information which will be provided to the NYS Office of New Americans. All staff claimed under this grant must also keep timesheets for the total hours worked on this grant.

Q89: Use of ONA funds for childcare: Is childcare an allowable expense under this RFA? Would we be able to enter into a subcontract with a childcare provider and reimburse the provider through these ONA funds?

A89: Childcare is an allowable expense under this RFA, under the \$150,000 base budget with reimbursement conditioned on agency approved budget and proof of payment documentation such as invoices and receipts. The agency may purchase services from a licensed childcare provider which would be reimbursable through these ONA funds.

Q90: Civics preparation: Will citizenship preparation classes be required under this RFA, as is currently required?

A90: Citizenship Preparation classes are not required, however, ESOL curriculum should be contextualized with a focus on instruction in language necessary in the workplace and U.S civics.

Q91: Clarification on access to Additional Opportunities: On page 17 required documentation for the new workshops include “Record of names and affiliation of partner agencies preparing presentations”. Is it permissible that the ONA Program Coordinator or other professional agency staff deliver these workshops on appropriate topics?

A91: Yes, it is permissible that the ONA Program Coordinator and other professional agency staff deliver the workshops as their expertise allows.

Q92: Clarification on number of quarterly applicants registered for Q3 ESOL: Page 4, paragraph 3 notes that 60 clients must be registered between Q’s 1, 2, and 4 and 40 clients in Q3 while page 20 and 25, letter d states that “The plan should demonstrate that the applicant will be able to register a minimum of 60 students in Q1, Q2, and Q4 and a minimum of 45 students in Q3. Can you please clarify the numbers for Q3?

A92: In Q3, a minimum of 40 clients should be registered, not 45 as stated on pages 20 and 25. At the beginning of Quarter 1 (Jan – March), Quarter 2 (April – June), and Quarter 4 (October – December), each organization should register a cohort of sixty (60) clients. **At the beginning of the summer quarter, Quarter 3, each organization should register a cohort of forty (40) clients**, for a total of 220 registered clients across four (4) quarters per year. Of these registered clients, each ONA Opportunity Center should ensure that 45 clients in Quarters 1, 2, and 4, and 30 clients in Quarter 3(75% of clients in each cohort), at a minimum, will complete the entire one hundred (100) hours by the end of the quarter.

Q93: Clarification on page limits: Other than your request that the budget narrative be up to 2 pages (page 28, letter b), there isn't a clear indication of a page limit or a program summary. Are there any for the main narrative section or the entire RFA?

A93: There is no page limit for the narrative.

Q94: Clarification on client registration: Page 4, paragraph states "Registration of clients will be required to have been accomplished by the second week of the quarter". What happens when the schedules do not align? For instance, one of our primary partner's next semester begins in September and we have 3 weeks to register new students. If students are to be part of ONA, we would need to enroll them before those 3 weeks are over because ONA's quarter begins in October. Is it possible to accept students during the time they are allowed to sign up with the college?

A94: Unfortunately there is no flexibility on the registration timeframes. In order to allow enough time for the completion of 100 hours, students must be registered by the second week of the quarter. Student registration may begin prior to the quarter start date. If registration happens after the second week in the quarter and the target for 100 hours of ESOL completion is met, the agency will be credited in that quarter for those students, however the agency may be subject to corrective action for not completing registration on time.

Q95: Clarification on immigrant assistance workshops: On page 11, section F, the bottom paragraph states "ONA OC's should provide NA with information about civic and community engagement opportunities through 9 immigrant assistance workshops a year at a minimum". If a partner organization is presenting a similar topic at their own location (which might be more convenient to our clients), can we count it as an event as long as we refer them there and have a sign-in sheet?

A95: The NYS Office for New Americans encourages community collaboration, however, time and effort attributed to the workshops should be more than just a referral.

Q96: While stipends are not allowed, is it permissible to provide volunteers (in particular interns) with fare cards for public transportation, e.g., Metro Cards for New York City buses or subways?

A96: Volunteer stipends are not eligible under the grant, however, providing organizationally purchased metro cards to volunteers is reimbursable contingent on agency approved budget and proof of payment documentation such as invoices and receipts. Metro card reimbursement should only cover travel to ONA specific events and activities.

Q97: Is it acceptable for a college student who volunteers with the program to receive a credit or credits for his or her volunteer activities with the program?

A97: Volunteer compensation through the use of college credits is left to the agency's discretion.

Q98: Are volunteers required to have any educational credentials? Some volunteers we are considering as resources for our program do not have significant formal education, but are highly respected within a particular element of the immigrant community.

A98: The NYS Office for New Americans does not require any educational credentials for volunteers.

Q99: If an institution responding to this RFA is a multi-service organization like a settlement house or a neighborhood center that offers a range of services for a variety of populations will ONA penalize that institution for not submitting a consortium application?

A99: There is no advantage or extra points awarded to organizations applying as part of a consortium.

Q100: Are there specific types of ESOL software or kinds of ESOL mobile apps that ONA requires responding organizations to use?

A100: There is no required ESOL software or mobile apps.

Q101: Will ONA reimburse responding organizations for costs associated with the conducting of background checks on prospective staff and prospective volunteers? If so, how do responding organizations secure reimbursement payments?

A101: Yes. The NYS Office for New Americans may reimburse for costs associated with conducting background checks on prospective staff and volunteers, provided that the staff and volunteers are working on the NYS Office for New Americans grant. Reimbursements are done quarterly, based on agency budget, submission of invoices, receipts, and proof of payment.

Q102: How does ONA distinguish a member of a consortium from an institution that partners with the responding organization to provide supportive services? Does being a member of a consortium mean that such institutions will be paid for their services through monies allotted to organizations that receive contracts via this RFA? Does being a partner mean that an organization that provides supportive services does it without the receipt of grant funds?

A102: Consortium member organizations are not-for-profit organizations with 501(c)(3) IRS status providing a key service on behalf of the lead agency. If an Applicant will be partnering with a Consortium member, the Applicant must submit an MOU, signed by the Applicant and proposed Consortium Member(s), outlining services to be delivered, proposed payment structure, and proposed service delivery dates. Consortium members may be paid with grant funds.

Community Partner organizations are community organizations that will partner with the lead agency to enhance the services offered at the Opportunity Center. As part of this application, the applicant must attach at least two (2) brief letters of support from community partners, expressing their support for the application and setting forth the commitment the organization is making to the application.

Q103: Does a partnering organization have to be a direct service provider? Can a partnering organization provide staff development support?

A103: A partnering organization is any organization is a community organization that will partner with the lead agency to enhance services offered at the Opportunity Center. A partnering organization may provide staff development support.

Q104: Are support letters from government agencies like the Small Business Administration or the Mayor's Office on Immigration acceptable?

A104: Letters of support should be from community partners with whom the applicant will be partnering. Letters should express their support for the application and setting forth the commitment the organization is making to the application.

Q105: Is it permissible for organizations to charge 10 percent of the budget for overhead?

A105: Only agencies with an approved federal indirect cost rate can charge for overhead.

Q106: Can a government agency be a local partner?

A106: While most government agencies would not count as a local partner, we encourage relationships with government agencies.. A partnering organization is a community organization that will partner with the lead agency to enhance services offered at the Opportunity Center.

Q107: Page 7, second paragraph states "In addition to hosting Citizen Drives, ONA Opportunity centers will assist New Americans with citizenship applications on a rolling basis through the CitizenWorks program." Will the "assistance" mentioned include assisting New Americans with acquiring residency prior to citizen application eligibility? If so, and the New American is unable to obtain residency, will they be targeted for deportation?

A107: Opportunity Centers will be assisting eligible applicants with citizenship applications (N400/N600) and deferred action applications. Under this grant, Opportunity Center staff will not be assisting with acquiring residency prior to Citizenship application eligibility. If clients have questions about their status, they may seek counsel from the ONA Legal Counsel at an Immigration Law Consultation Day held at the Opportunity Center.

Q108: IV. Funding - "Up to \$25,000 of these funds is available..." Must \$25,000 be held out for client retention and immigration fees from each center's budget or can that money be used for general budget expenses?

A108: Of the \$175,000 budget, \$25,000 must be held for client retention and immigration fees. The remaining \$150,000 is to be used for general budget expenses.

Q109: B.1. ESOL Participant... "Registration of clients..." Breaking up the ESOL enrollment by quarter (With the threat of corrective action.) places a burden on programs due to uneven arrival flow of clients, parents needed to be at home during summer and vacation periods, etc. That is particularly so

if enrollment must be done within the first two weeks of the quarter. Would ONA re-consider these restrictions to allow for some flexibility?

A109: Unfortunately there is no flexibility on the registration timeframes. In order to allow enough time for the completion of 100 hours, students must be registered by the second week of the quarter. Student registration may begin prior to the quarter start date. If registration happens after the second week in the quarter and the target for 100 hours of ESOL completion is met, the agency will be credited in that quarter for those students, however the agency may be subject to corrective action for not completing registration on time.

Q110: Requirement to test each student twice within each quarter will add significantly to cost of testing and time required of staff. Would ONA re-consider the per quarter restrictions to allow for some flexibility?

A110: In order to measure proficiency, a pre-test and post-test is needed to see gains within the quarter. However, if a student continues into the next quarter, the post-test from the previous quarter may count as the pre-test in the current quarter.

Q111: Pages 2 & 3: Does the organization's mission have to explicitly state that the organization will provide services to economically or socially disadvantaged persons, and explicitly say they work to service immigrants or New Americans? Or, can the mission be general enough to include the aforementioned populations?

A111: The mission may be general enough to include the aforementioned populations.

Q112: Page 4: Question regarding the passage: "... with classes scheduled to best accommodate the diverse work schedules of the New American communities by offering day, night, and weekend classes." Must ESOL include weekend instruction, even if they are offering day and/or night classes?

A112: While weekend classes are not required, there is an expectation that the classes should best accommodate the diverse work schedules of the New Americans in their communities.

Q113: Page 4: Must the beginner, intermediate and advanced level courses be offered simultaneously as each other, or can they change from beginner to intermediate to advance within the quarter?

A113: All ONA Opportunity Centers should be prepared and have the capacity to teach ESOL courses as outlined in the RFA, including beginning, intermediate, and advanced ESOL in a quarter. ONA Opportunity Center host organizations must demonstrate strong outreach to relevant populations for each level of ESOL. If after this dedicated outreach and technical assistance from ONA with said outreach results in pre-tests in a particular quarter indicate that there is no interest for a particular class in that quarter, the NYS Office for New Americans may issue a waiver to the agency at that time. In such cases, the ONA Opportunity Center would increase the number of offerings on the other levels of English so the total number of clients served in the quarter remains unchanged.

Q114: Page 10: Is the agreement to pursue BIA accreditation a requirement within this contract?

A114: Yes, see RFA page 10. The organizations providing the Naturalization and Deferred Action Assistance and Legal Consultation Services funded under the ONA grant is expected to pursue BIA accreditation, as without BIA accreditation it is difficult to meet the annual goals.

Q115: Page 10: Must a lead organization pursue BIA accreditation even if they have an immigration attorney on staff that will be assigned to the ONA program?

A115: The organizations providing the Naturalization and Deferred Action Assistance and Legal Consultation Services funded under the ONA grant is expected to pursue BIA accreditation, as without BIA accreditation it is difficult to meet the annual goals.

Q116: Page 10: Must a lead organization pursue BIA accreditation even if they are not providing direct immigration legal services?

A116: The organizations providing the Naturalization and Deferred Action Assistance and Legal Consultation Services funded under the ONA grant is expected to pursue BIA accreditation, as without BIA accreditation it is difficult to meet the annual goals.

Q117: Page 10: In lieu of pursuing BIA accreditation, may an organization fulfil this requirement by encouraging and assisting other non-profits to apply for BIA accreditation?

A117: No. The organizations providing the Naturalization and Deferred Action Assistance and Legal Consultation Services funded under the ONA grant is expected to pursue BIA accreditation, as without BIA accreditation it is difficult to meet the annual goals.