

**U.S. Department of Health & Human Services
Administration for Children and Families**



ADMINISTRATION FOR
CHILDREN & FAMILIES

Grant Review Handbook

NOTE: FOR ACF INTERNAL STAFF AND/OR CONTRACTORS

The ACF Grant Review Handbook was produced in the collaboration with the ACF Grant Review Workgroup comprised of representatives from each ACF program office. The Handbook reflects policies and procedures from the AAGAM as well as ACF business processes from the Division of Grants Policy and Division of Discretionary Grants.

The Handbook is to be used by all ACF program offices. Program Offices must incorporate guidance provided within the document in their grant reviews. It is our hope this will ensure consistent reviews across program offices by providing guidance to federal staff, contractors, and panel members.

While we recognize each program office approaches their reviews somewhat differently, the Grant Review Handbook attempts to incorporate the different review processes for ACF (i.e., remote, on-site, and hybrid) into one guidance document.

Please note that when tailoring the Handbook to meet specific program grant review need, the content in the Handbook itself may not be edited. Program offices should instead include additional supplemental information to Handbook in consultation with OA.

Program Offices can omit this page as well as Appendix D, ACF Grant Review Feedback Forms, from the Handbook. The feedback forms can be submitted separately to panel members.

Should you have any questions regarding this Handbook, please direct them to Peter Thompson, Director, Division of Grants Policy.

Table of Contents

INTRODUCTION	5
Grant Review Guide Objectives	5
CHAPTER 1 – OVERVIEW	6
Administration for Children and Families.....	6
Division of Discretionary Grants (DDG)	6
ACF Program Offices.....	6
CHAPTER 2 – GRANT REVIEW PROCESS	7
Types of Grant Reviews	7
Grant Review Overview	8
Grant Review Key Players.....	10
<i>Reviewers</i>	10
<i>Panel Chairpersons</i>	11
<i>Sub Area Manager (SAM)*</i>	13
<i>Priority Area Manager (PAM)*</i>	13
<i>Federal Contractor</i>	14
CHAPTER 3 –ETHICAL REQUIREMENTS AND SPECIAL CONCERNS	16
Ethical Requirements	16
<i>Confidentiality</i>	16
<i>Conflict of Interest</i>	16
Special Concerns.....	17
CHAPTER 4 – REVIEWING APPLICATIONS	18
Understanding the FOA and Reading Applications	18
Evaluating Applications	19
Evaluating Budgets	20
Writing Comments	21
Scoring Applications	25
APPENDIX A: Federal Forms	28
Certification Form Regarding Conflict Of Interest, Confidentiality and Non-Disclosure for Reviewers of Grant Applications.....	28
Grant Reviewer Special Concerns Form	29
Grant Reviewer Guide to Identifying Religious Issues	30

APPENDIX B: Review Questions and Answers..... 32

APPENDIX C: Guidance on Faith- and Community-Based Organizations 34

 Legal Safeguards: Separate Religious Programs..... 34

 Frequently Asked Questions and Answers Concerning Equal Treatment for Faith-Based Organizations 37

APPENDIX D: ACF Grant Review Feedback Forms 39

INTRODUCTION

The Administration for Children and Families (ACF) generally awards up to \$16 billion annually in discretionary funds to states, tribal governments, faith-based and community-based organizations, for-profit organizations, and other eligible entities to promote the economic and social well-being of the American public. Grant proposals for funds are solicited from the public through Funding Opportunity Announcements (FOAs). FOAs describe the programmatic and financial requirements of the grant program.

ACF implements strict procedures during the grant review process to ensure good stewardship of federal funds and equitable awarding results. The review of applications is an integral part of ACF's mandate in dispersing funds.

ACF developed this guide to clearly delineate the structure of its grant review process with the purpose of ensuring every review is accurate and impartial. The guide is based on established policies and written training materials from ACF program offices and is intended for those involved in the grant review process, including reviewers and panel chairpersons.

Grant reviews are fundamental to the decision-making and awarding processes. ACF uses peer reviewers in its grant review process. A peer review is an assessment of scientific or technical merit of applications by individuals with knowledge and experience equal (peer) to that of the individuals affiliated with the applicant organizations. The review is conducted with a minimum of three reviewers and a panel chairperson who facilitates the process.

Conducting an objective review is essential to ensure a selection of applications that best meets the needs of the program consistent with the goals and evaluation criteria identified in the FOA. An objective review also ensures that the grant review process is impartial and fair. Reviewers are carefully chosen by ACF program offices for their ability to critically and objectively assess the quality of a proposed project.

Grant Review Guide Objectives

This guide is designed to improve the quality, consistency, and efficiency of the ACF grant review process. After reading this guide, reviewers and panel chairpersons should be able to:

- Understand the roles and responsibilities of the key players (i.e., reviewer, panel chairperson, and federal staff) to uphold the integrity, professionalism, and impartiality of the ACF grant review process.
- Recognize the importance of adhering to ethical and federal requirements.
- Correctly and effectively analyze grant applications, write evaluative comments, and provide accurate scores in relation to the published FOA.

CHAPTER 1 – OVERVIEW

Administration for Children and Families

ACF is a principal operating division of the Department of Health and Human Services (HHS) and is headed by the Assistant Secretary for Children and Families, who reports directly to the Secretary. ACF is responsible for federal programs that promote the economic and social well-being of families, children, individuals, and communities. ACF programs aim to achieve the following:

- Families and individuals empowered to increase their own economic independence and productivity;
- Strong, healthy, supportive communities that have a positive impact on the quality of life and the development of children;
- Partnerships with front-line service providers, states, localities, tribes, and tribal communities to identify and implement solutions that transcend traditional program boundaries;
- Services planned, reformed, and integrated to improve needed access; and
- A strong commitment to address the needs, strengths, and abilities of vulnerable populations, including people with developmental disabilities, refugees, and migrants.

Division of Discretionary Grants (DDG)

The Division of Discretionary Grants (DDG) is part of ACF's Office of Administration. DDG is responsible for the business management and other non-programmatic aspects of the discretionary grants process. These activities include, but are not limited to, reviewing grant applications for budgetary concerns; providing consultation and technical assistance to applicants and recipients, including interpretation of grants administration policies and provisions; and administering and closing out grants. Grants Management Officers (GMOs) are the focal points for receiving and acting on requests for prior approval or for changes in the terms and conditions of awards.

The primary job of the GMOs is to ensure consistent application of the ACF grant review process to all project areas. During the grant review training session, DDG will present information pertaining to the issues of confidentiality and conflict of interest. DDG, in consultation with the program office, makes the final determination on any application identified as ineligible for review (i.e., a late application, over the funding limit, submitting a paper application without a waiver, and any other approved disqualification determined by the program office).

ACF Program Offices

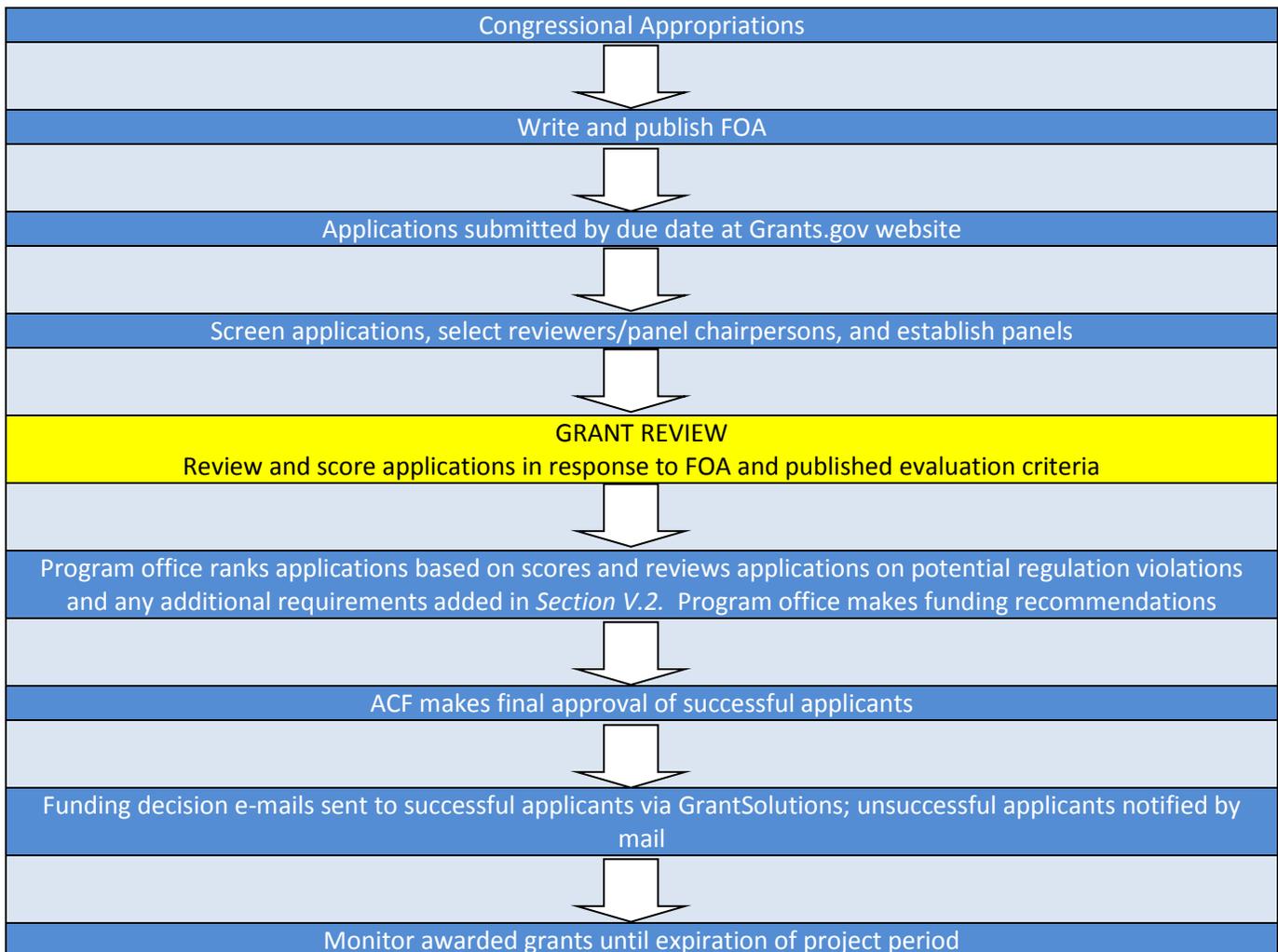
ACF has ten program offices that publish FOAs and convene grant reviews. They are the Administration for Native Americans, Children's Bureau, Family and Youth Services Bureau, Office of Child Care, Office of Child Support Enforcement, Office of Community Services, Office of Family Assistance, Office of Head Start, Office of Planning, Research and Evaluation, and the Office of Refugee Resettlement.

Program offices are responsible for writing a FOA for each of their grant programs, recruiting and selecting grant reviewers, providing reviewer training, managing the grant review process, and ultimately deciding which applications to fund. Program offices maintain some flexibility in how they structure and manage grant reviews, and details of the grant review process vary between offices.

CHAPTER 2 – GRANT REVIEW PROCESS

Each discretionary grant application that is reviewed receives a comprehensive and impartial evaluation by a panel of peer reviewers. This chapter will give an overview of the grant review process, types of grant reviews, and the roles and responsibilities of key players during the grant review process. **It is important to note that key players, duties, and responsibilities may vary depending on the program office overseeing the grant review and the type of grant review being conducted. For any areas not covered in this guide, such as FOA and program-specific information, reviewers need to refer to guidance provided by the respective program office.**

The figure below provides an overview of the discretionary grant making process at ACF.



Types of Grant Reviews

There are generally two types of reviews conducted by ACF to evaluate discretionary grant applications: field/remote reviews and on-site reviews. The type of review is dependent upon the needs of the program office and the management style of those directing the review. The grant review is conducted

in panels that contain a minimum of at least three reviewers and a panel chairperson. The number of review applications for each panel is based on the number of applications received for the FOA.

The most common type of review used by ACF program offices are **field** or **remote review**. This review model entails delivering applications to individual panel members electronically or via overnight delivery. During the field review, panel members individually read, evaluate, write comments, and tentatively score the application in preparation for the panel discussions. Rather than meeting in person, reviewers communicate via e-mail and telephone to discuss each application, assign scores, and assist the panel chairperson in completing a Final Panel Summary report. This document records all of the panelists' final scores, the averages of those scores, and panel's consensus on comments supporting the scores.

Another type of review is **on-site review** sessions, where reviewers from across the United States and its territories convene in Washington, D.C., or another central location to read, evaluate, and score applications. Review sessions generally last one to two weeks, depending upon the number of applications. Reviewers individually read, evaluate, write comments, and tentatively score the application in preparation for the panel meetings. During panel meetings, reviewers discuss each application, assign final scores, and assist the panel chairperson in completing a Final Panel Summary report.

Some program offices utilize a **hybrid review**, which combines the use of remote and on-site approaches. For example, a hybrid approach may have reviewers read, comment, and score all applications remotely and then gather for face-to-face consensus meetings, assigning final scores, and writing the Final Panel Summary report.

The majority of ACF program offices use the Application Review Module (ARM) system to assist with the different types of reviews. ARM is a web-based secure system accessible to the reviewers, panel chairperson, and federal staff. It facilitates the communication between the reviewers and panel chairperson with regard to submitting comments (strengths and weaknesses) and scores in a timely manner. Chairpersons use ARM to summarize all panel members' final scores and comments from panel discussions and display them in a PDF format report for the Final Panel Summary report. Federal staff and contractors can use the system to receive instant reporting and real-time monitoring on the overall progress of a review, or the progress of individual panels or panel members.

Grant Review Overview

The grant review is an important process that requires a commitment from the reviewers, panel chairpersons, federal Priority Area Manager (PAMs), federal Sub Area Managers (SAMs), and the federal contractor. It is important to note that some of the roles involved will vary among program offices; some may not use a SAM. **Reviewers and panel chairpersons must adhere to the review structure designated by the program office.**

Reviewers and panel chairpersons are selected from a pool of candidates on the basis of their general or specialized work experience in a program area and previous experience as reviewers or chair. Their responsibilities include reviewing and analyzing applications in response to the FOA and published evaluation criteria.

In order to complete tasks on time, reviewers and panel chairpersons need to comply with the scheduled deadlines established by the ACF program office. This will entail some independent work, but will also involve panel meetings. Depending on the type of review, these panel meetings may be via phone or in person. These meetings are confidential and only open to reviewers, panel chairperson, the SAM and/or PAM, and federal contractor. The purpose of these panel meetings is to discuss the reviewers' assessed scores and the strengths and weaknesses of the application under review.

In review of the evaluation criteria, the panel writes and submits comments and scores in the ARM system for the panel chairperson to use in writing the Panel Summary report. The Panel Summary report describes the consensus of the panel reviewers' comments (strengths and weaknesses) and identifies reviewers' individual scores based on each criteria section (e.g., Objectives and Needs for Assistance, Approach, Budget, etc.). The full panel reaches this summary based on individual reviews of each application in response to the published evaluation criteria. Comments must be consistent with the application's scores, be well written and clear, not mix a strength and weakness in one comment, and provide adequate detail and justification.

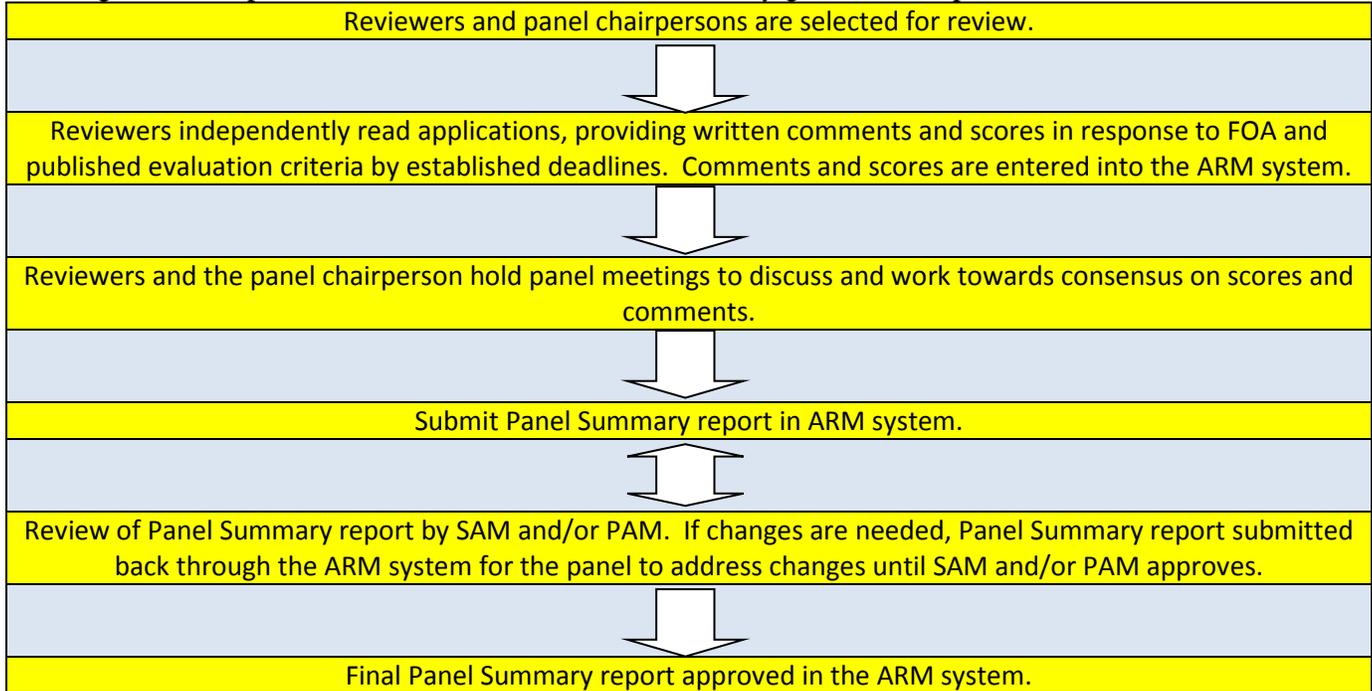
If marked differences of opinion about an application exist among reviewers, the panel chairperson and reviewers will discuss the reasons for these differences and seek consensus. The program office may provide specific guidance on how to define what is an acceptable point spread between reviewers. Reviewers need not allot the same points per criteria, but there should not be a wide point difference between reviewers. A wide point spread would indicate that there are conflicting views as to whether the applicant has successfully addressed the criteria as stated in the FOA. In instances where panel members are unable to reach a satisfactory conclusion, the panel chairperson should seek assistance from the SAM and/or PAM. The review process may involve several iterations of rewriting comments and revisiting scores to reflect a consensus of the reviewers' interpretation of the evaluation criteria in the published FOA. When this happens, reviewers must make any changes to their scores and/or comments in the ARM system. The revised draft of the Panel Summary report is then submitted through the ARM system to the SAM and/or PAM.

The SAM and/or PAM may return the Panel Summary reports through the ARM system to the panel for clarification or revision of comments. Reviewers must assist the panel chairperson; this may include writing new comments based on feedback or rewriting previous comments. Revised comments should be resubmitted as soon as possible to the SAM and/or PAM for additional review and final approval.

Each application must be judged on its own merits and not compared to other applications. In addition, reviewers and the panel chairperson must use the published evaluation criteria found in *Section V.I. Criteria* of the FOA to review applications. Creating templates based on the FOA's published evaluation criteria to be used during the review (e.g., cut and paste the criteria into a Word document) is not allowed.

Reviewers and the panel chairperson shall not collaborate with other panel members from different panels during the grant review process. In addition, reviewers and the panel chairperson may not seek additional outside information on the application or organization in review even if a link is provided in the application (e.g., doing an internet search on an organization). If a reviewer has any questions, they may seek guidance from the panel chairperson and/or SAM/PAM for further clarification.

The figure below provides an overview of the discretionary grant review process at ACF.



Grant Review Key Players

Reviewers

Responsibilities of a Reviewer

Key Principles

Reviewers will:

- Respect and collaborate with fellow panel members.
- Read the entire FOA, paying particular attention to *Section I. Funding Opportunity Description*, *Section IV.2 The Project Description*, and the evaluation criteria in *Section V.1. Criteria*.
- Possess relevant knowledge of the program area and agree to the requirements for the grant review's integrity, time commitment, and workload (e.g., extensive reading and writing, lengthy discussions).
- Possess good writing and analytical skills, and be proficient with computers and typing.
- Be ready to commit and contribute a fair amount of time and effort throughout the entire grant review. Reviewers must be able to read the entire application and assess how well the applicant addresses the FOA evaluation criteria. Reviewers must complete the initial scoring and comments independently, without conferring with other people or resources.

During the Review

The responsibilities of reviewers will vary according to the program office and the type of review (i.e., remote, on-site, or hybrid). Some of the following responsibilities may differ depending on the review selected.

Reviewers will:

- Participate in all scheduled training sessions provided by the ACF program office and federal contractor.
- Adhere to training guidelines outlined in this handbook and by the respective ACF program office, including requirements on confidentiality and conflict of interest.
- Complete the Conflict of Interest and Confidentiality Statement and provide to the federal contact person.
- Thoroughly read the assigned applications, paying particular attention to the goals and objectives in *Section I.*, the application requirements in *Section IV.2.*, and the evaluation criteria in *Section V.1. Criteria* of the FOA. Accuracy and thoroughness are important, and, if necessary, reviewers must re-examine the applications to determine if any information was overlooked during the initial read. Each application must be reviewed separately and not compared to other applications.
- Review the application for any issues noted in [Chapter Three](#) of this guide and notate on the [Grant Reviewer Special Concerns](#) form.
- Provide written evaluative statements and assign scores in response to the applicant's proposal and the published FOA's evaluation criteria prior to the panel meeting. Submit all information in the ARM system.
- Participate in the panel meeting discussion of all comments (e.g., "Does this strength [or weakness] accurately reflect the application's content, evaluation criteria, and scores?") when the panel chairperson presents the combined statements for the Panel Summary report.
- Collaborate with panel members and the panel chairperson to finalize the comments and scores for an approved Panel Summary report.
- If applicable, provide feedback on the grant review process using the ACF evaluation form.

Panel Chairpersons

Responsibilities of a Panel Chairperson

Key Principles

Panel chairpersons will:

- Respect and collaborate with fellow panel members, provide assistance to the reviewers, and mentor new reviewers in the process.
- Possess relevant knowledge of the program area, and agree to the requirements for the grant review's integrity, time commitment, and workload (e.g., extensive reading and writing, lengthy discussions) throughout the entire grant review.
- Possess good writing and analytical skills, and be proficient with computers and typing.
- Possess good facilitation skills, including, but not limited to: an ability to set ground rules, keep meetings on track, recognize problems and respond appropriately, and mediate conflict as needed.
- Be facilitators and leaders for their assigned panel of reviewers, and set the tone and direction once their panel begins the grant review process.
- Read and establish a thorough understanding of the FOA, paying particular attention to *Section I. Funding Opportunity Description*, *Section IV.2 The Project Description*, and the evaluation criteria in *Section V.1. Criteria*; and be able to respond to questions and concerns identified by panel members.

During the Review

The responsibilities of panel chairpersons will vary according to the program office and the type of review (i.e., remote, on-site, or hybrid). Some of the following responsibilities may differ depending on the review selected. Generally, panel chairpersons will:

- Attend all training sessions and be able to provide a summary and clarification for panel members on content covered. Facilitate introduction of panel members and establish ground rules.
- Facilitate the provided schedule and/or establish a panel meeting schedule. Adjust the schedule as needed to meet deadlines established by the program office.
- Read all of the assigned applications.
- Confer with reviewers to assess any issues surrounding conflict of interest and confidentiality. The chairperson should also complete the Conflict of Interest and Confidentiality Statement. If a conflict does exist, the panel chairperson must notify the SAM and/or PAM.
- Report to SAM and/or PAM if any application might not be eligible for review (based on disqualification factors outlined in *Section III.3. Application Disqualification Factors* in the FOA).
- Maintain open communication with SAM and/or PAM regarding progress, group process, and any emerging issues related to panel functioning.
- Facilitate reviewers' participation in panel discussions to help ensure that each application receives an objective review.
- Check reviewer comments for clarity, completeness, appropriateness, and grammar/syntax. Check for contradictions between strengths and weaknesses. Check that comments include sufficient justification based on the application. Ensure that review comments are based solely on published FOA evaluation criteria.
- Seek to resolve any markedly incongruent comments and scores between the reviewers on their panel. The chairperson should encourage movement toward consensus. (Some program offices may define a point spread that describes an acceptable range of scores between/among reviewers).
- Compile reviewer comments for the Panel Summary report and submit to SAM and/or PAM through the ARM system.
- Complete any and all changes requested by the SAM and/or PAM (in collaboration with reviewers) and resubmit the Panel Summary report as soon as possible through the ARM system.
- If applicable, provide feedback on the grant review process using the ACF evaluation form.

Helpful Hints for the Panel Chairperson

1. Establish ground rules early with your panel reviewers. For example, if you are not comfortable receiving calls before or after a certain hour or if you prefer no texting, clearly convey these expectations to your panel members.
2. Ensure respect throughout the process; this is important for the grant reviews to proceed smoothly.
3. Ask open-ended questions.
4. Watch group dynamics; if challenges arise, address them immediately. If unable to resolve them,

inform your SAM and/or PAM.

5. Ask reviewers to expand on their comments with specific examples from the application and not repeat evaluation criteria.
6. Practice problem solving and consensus building.

Federal Staff

Sub Area Manager (SAM)*

*Process will vary among program offices; some may only use a Priority Area Manager (PAM). Reviewers must accord with the structure designated by the program office.

The SAM is a member of the federal staff designated to assist the panel. The duties of a SAM will vary according to the requests of the PAM. SAMs are responsible for tracking the progress of several panels of reviewers and keeping the PAM apprised of how the work of the panels is progressing. SAMs are available to answer chair and reviewers' questions and review the Panel Summary reports for consistency with the FOA evaluation criteria. SAMs must be present throughout the grant review process and accessible to panel members each day of the review session. Some of the duties may include, but are not limited to:

- Promote a positive review environment.
- Assist in the training of reviewers and chairpersons, as needed.
- Ensure that the Conflict of Interest and Confidentiality statements are signed.
- Listen and/or attend panel meetings.
- Provide technical assistance to reviewers and panel chairperson, as needed.
- Encourage and assist panels to complete their tasks efficiently and effectively.
- Review Panel Summary reports in the ARM system for accuracy and any inconsistencies with the FOA. If any issues are noted, send the reports back to panel chairperson for revision.
- Maintain communication with the panel chairperson in order to quickly resolve any problems or other issues that arise.
- Convey any needs and/or problems to the PAM as soon as they arise.

Priority Area Manager (PAM)*

*Process and responsibilities of PAM will vary among program offices. Reviewers must accord with the structure designated by the program office.

The PAM is a program expert within the program office for the project under review and is responsible for ensuring the grant review runs smoothly. Some of the duties may include, but are not limited to:

- Conduct or coordinate training sessions for reviewers and panel chairpersons on or prior to the first day of the review. These sessions explain the grant application process, the evaluation criteria, federal requirements (e.g., conflict of interest requirements, confidentiality, Equal Treatment for Faith-Based Organizations, anti-discrimination, the responsibilities of panel members and federal staff, and all of the forms that are to be used during the review).
- Oversee all of the panel reviews to ensure that each application is thoroughly and objectively reviewed.

- Provide technical assistance to the SAMs, panel chairpersons, and reviewers, as needed.
- Listen and/or attend selected panel meetings to assess progress, work with the SAMs to resolve problems and clarify issues, and reassigns applications from one panel to another when a conflict of interest exists. If a panel has an irreconcilable problem that prevents it from functioning effectively, the PAM has the authority to either reassign or remove reviewers or panel chairpersons.
- Verify that all applications are reviewed and scored. Ensure that comments on the Panel Summary reports are grammatically correct, provide detailed justification for the scores, are not mixed between strength and weakness statements, and align with the appropriate section. Furthermore, the PAM reviews the comments to see that they correspond to the appropriate published FOA evaluation criteria and substantiate the scores. If scores and/or comments are not adequately substantiated, the PAM will require revisions before approving the Panel Summary report. Once the Panel Summary reports are confirmed to be correct and complete, the PAM approves them in the ARM system.

In general, the SAM and/or PAM are the federal program office representatives in charge of the grant and provide assistance throughout the grant review process. They should not impede the integrity of the peer review. For example, SAMs and/or PAMs may not direct a panel to give a certain numerical score to a particular strength or weakness comment. They may, however, direct a panel to revisit scoring and comments if they are not consistent (e.g., scoring high with important weaknesses identified or providing further justification and examples within a comment for a high score). In addition, since the SAM and/or PAM can read an application, they can question the panel's assessment of comments **only** in relation to *Section V.1 Criteria* in the FOA. The SAM and the PAM are impartial in the process, ensuring that the process is credible and fair.

Federal Contractor

ACF finds that securing an independent, non-governmental contractor is often an efficient way to facilitate an effective and impartial grant review. The federal contractor may be given a variety of responsibilities including, but not limited to:

- Contacting and confirming potential reviewers and panel chairpersons;
- Making the necessary logistical arrangements for the review session;
- Issuing payment to reviewers for time during reviews;
- Tracking received applications and preparing them for the review;
- Providing on-site assistance with ARM and IT; and
- Lending general assistance to ACF staff.

Chapter 2 Review Questions

1. As a reviewer or panel chairperson, can you create your own template of the evaluation criteria to assist during the review if it is based on some of the information in the published FOA and FOA evaluation criteria?
2. There is an 80-page limit for the application and an applicant references a website within their approach. The link brings the panel to more information on their program since they did not have space to include their organizational capacity and experience related to the project. As a reviewer or

panel chairperson, can you look this information up since it is referenced in their submitted application?

3. The panel chairperson is responsible for writing initial comments for the application in review. True or False
4. You have submitted a Panel Summary report to your SAM or PAM, and they return it to the panel because the comments reflect a significant weakness. Can the SAM or PAM request that you reduce the score by five points? Can the SAM or PAM request that you rewrite the comments to reflect what is requested in *Section V.1* of the FOA?

Answers can be found in [Appendix B](#)

CHAPTER 3 –ETHICAL REQUIREMENTS AND SPECIAL CONCERNS

Reviewers and panel chairpersons play an important role in maintaining the quality and integrity of the grant review process. They must fully understand and comply with the following requirements to ensure an uncompromised and ethical review:

- The protection of the confidentiality of applicants' proprietary information.
- The elimination of any conflict of interest that could affect the unbiased, objective review of an application.

Ethical Requirements

Prior to reviewing applications, ACF requires all reviewers and panel chairpersons to complete the *Certification Form Regarding Conflict of Interest, Confidentiality and Non-Disclosure for Reviewers of Grant Applications*. (See [Appendix A](#).)

Confidentiality

At no time when reviewing applications, or after, shall panel members discuss the applications, comments, recommendations, evaluations, review scores, names of applicants, name of other reviewers, or names of panel chairpersons with anyone not on their panel. Panel discussions are restricted to panel members only. Applications are submitted to the ACF Program Office in confidence, and panel members must respect that confidentiality. **Furthermore, reviewers or panel chairpersons must never contact applicants concerning the review process of their application before, during, or after the grant review process.** Confirmed reports of any breach of confidentiality will result in immediate dismissal from the review and possible removal from the ACF reviewer database.

Conflict of Interest

ACF requires reviewers and panel chairpersons to notify the SAM and/or PAM of any personal or financial interest they may have regarding an application as soon as possible. The PAM and contractor assign reviewers, panel chairpersons, and applications to panels in a manner intended to avoid possible conflicts of interest, but some conflicts occasionally go unidentified.

Conflicts of interest are identified in [Appendix A](#), *Certification Form Regarding Conflicts of Interest, Confidentiality and Non-Disclosure for Reviewers of Grant Applications*. For example, a reviewer or panel chairperson that serves as an officer, director, trustee, partner, or employee of the applicant organization, or has a close family member in such a position, is a prime example of a conflict of interest. Any past, present, or anticipated financial relationship/interest of the reviewer or panel chairperson or a family member of either would also constitute a conflict. A reviewer or chairperson must not have submitted an application to the FOA under review. When in doubt, a reviewer or panel chairperson must immediately check with the SAM and/or PAM to clear up any possibility or appearance of conflict of interest immediately. A reviewer or panel chairperson who cannot be totally objective and free from bias must never review an application in question. This responsibility is strictly imposed upon reviewers and panel chairpersons, as an undetected conflict of interest undermines the entire grant review process.

Special Concerns

Additionally, when reviewing applications, reviewers and panel chairpersons should be aware of certain federal requirements pertaining to grant awards. While reviewers cannot score applications on any items that are not present in the FOA's evaluation criteria, they should use the [Grant Reviewer Special Concerns Form](#). Reviewers would submit the form to their SAM and/or PAM, noting any issues in an application that may require further analysis from federal staff regarding lack of compliance with Equal Treatment of Faith Based Organizations regulations.

The Grant Reviewer Special Concerns form may not be considered as part of the scoring procedure unless the evaluation criteria specifically address similar issues.

Reviewers must review the application and notate any inherently religious activities that would be supported by federal funds. Reviewers and/or the panel chairperson must document these issues on the *Grant Reviewer Special Concerns* form. Reviewers can also reference the *Grant Reviewer Guide to Identifying Religious Issues* form to identify the kinds of issues that should be identified. (See [Appendix A](#).)

Applicants that are awarded are subject to the requirements of 45 CFR § 87.1(c), Equal Treatment for Faith-Based Organizations, which says, "Organizations that receive direct financial assistance from the [Health and Human Services] Department under any Department program may not engage in inherently religious activities such as religious instruction, worship, or proselytization as part of the programs or services funded with direct financial assistance from the Department." Therefore, organizations must take steps to completely separate the presentation of any program with religious content from the presentation of the federally funded program by time or location ***in such a way that it is clear that the two programs are separate and distinct***. If separating the two programs by time but presenting them in the same location, one program must *completely* end before the other program begins.

Reviewers and/or the panel chairperson must document these issues on the *Grant Review Special Concerns* form. (See [Appendix A](#).) For more guidance in compliance with these regulations, please reference [Appendix C](#).

Chapter 3 Review Questions

1. In review of an application, there is a question regarding the applicant's proposal. The Panel Chairperson can contact the applicant to clarify the question. True or False.
2. An applicant can use federal funds to conduct both secular and inherently religious activities to ensure that the community is provided with an option of services based on a participant's religious preferences. True or False

Answers can be found in [Appendix B](#)

CHAPTER 4 – REVIEWING APPLICATIONS

This chapter focuses on the different aspects of reviewing applications, including understanding the FOA and reading applications, evaluating applications, evaluating budgets, writing substantive comments about an applicant’s response to the evaluation criteria, and scoring applications.

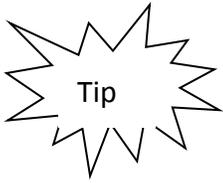
Understanding the FOA and Reading Applications

Reviewers and panel chairpersons must make themselves thoroughly familiar with the entire FOA, in particular *Sections I. Funding Opportunity Description, Section IV.2 The Project Description, and Section V.1 Criteria*. Reviewers will specifically use *Section V.1 Criteria* in the FOA to ensure that they are able to determine whether the application addresses the relevant issues as identified by the program office. As indicated in [Chapter Two](#), panel chairpersons and reviewers must use the published FOA evaluation criteria in *Section V.1 Criteria* to review applications and must not create their own templates based on the FOAs to be used during the review. Reviewers and panel chairpersons cannot cut and paste criteria into a separate Word document for their reviews. The exact wording and points’ distribution for the criteria in the FOA are important, so please make sure that you reference *Section V.1 Criteria* throughout your review.

Once applications are received, panels must consider the number of applications to be reviewed and the number of total pages, and allot an appropriate amount of time for each (including reading, scoring, and writing comments). Some applications may require more time, and others less, but establishing a maximum time for application review early in the process will ensure that subsequent applications receive appropriate attention.

It is important to note that each FOA includes standard language on formatting. ACF has introduced a new requirement on the number of files an applicant can upload. The FOA formatting instructions requires applicants to upload their application in two separate electronic files in Grants.gov. This requirement excludes standard forms (SFs) and OMB-approved forms. One file must contain the entire Project Description and Budget Justification (e.g., project summary/abstract, table of contents, project narrative, logic model, and budget); the other file must contain all documents required in the Appendices (e.g., organizational charts, third-party agreements, letters of support, resumes, and audit reports).

If an application has been reduced due to improper formatting of the submitted application, panel members are only to review and evaluate the information provided in the application given to them to review. **Panel members may want to speculate that missing pieces of the application (e.g., no resumes) were from sections removed to meet FOA formatting and page limitation requirements. However, they must not make such assumptions. If information is missing from the application (e.g., no resumes), and the reviewers comment on this lack based on the FOA criteria, they will need to notate “N/A,” “None,” or “No Page Found” for a specific page number. Applicants will be sent a standardized letter informing them of the reductions within their application.** Each program office has the discretion on page limitation(s) for each application. Please see *Section IV.2 Content and Form of Application Submission* for more information.



Tip

For applicants that have submitted their applications electronically via Grants.gov, every application will have a generated Table of Contents page. The Table of Contents page is the easiest way to tell if an application has been reduced due the two-file requirement. This page should be the first page and contain the applicant's name, application number, and project title. The page will also detail a list of files uploaded. In review of the application through ARM, reviewers will be able to see a separate page within the application for each file upload that was approved to be reviewed.

Panel members should always conduct a follow-up review of the application and their comments to ensure that they haven't overlooked any important information. However, if a Panel Summary report has already been submitted and approved by the PAM as final, no changes and/or edits can be made to the comments and/or scores unless rerouted back through the ARM system by the PAM.

Reviewers and panel chairpersons must critically read the application to evaluate how closely the applicant's program and activities respond to the FOA evaluation criteria. When reading an application, attention should be focused on locating the information that relates to the criteria. Reviewers are encouraged to note important points to be included in the comments and reference page numbers to relevant sections. If no page numbers are listed, reviewers should notate the section in which the information was found.

Evaluating Applications

First, the reviewer must decide what information in the application is pertinent information and addresses the FOA evaluation criteria in *Section V.1* of the FOA. Reviewers must critically evaluate the information to determine how well the applicant has responded to the FOA and evaluation criteria.

Helpful Questions for Evaluating an Application

While the application can only be scored against the published criteria, you may consider these overarching questions in your review:

1. Is the applicant responsive to the FOA evaluation criteria? Does the applicant provide sufficient details to explain how they will implement the program and how they meet the evaluation criteria?
2. Consider each criterion and decide if the applicant's response is complete, realistic, justified, and logically consistent with their overall proposal. Based on your experience and knowledge, are there any challenges or limitations to the applicant's responses to the criteria? Based on your experience and knowledge, is the applicant's proposed plan lacking important features that are necessary for addressing the criteria.
3. Do the ideas presented flow logically with the project narrative? Are the activities outlined in different sections of the application consistent? For example, do the activities listed for the program correspond with funding amounts in the budget?

Evaluating Budgets

A thorough review of the application's budget is essential, even if the budget section is not assigned a large number of points in the FOA evaluation criteria. The budget is a crucial piece of the project that reviewers must take into account to assess whether an applicant's proposal is feasible, reasonable, and accords with the requirements and goals of the FOA and relevant evaluation criteria.

All applicants are required to submit a project budget and budget justification with their application. The project budget is input on the Budget Information Standard Form, either SF-424A or SF-424C, according to the directions provided with the SFs. The budget justification consists of a budget narrative and a line-item budget detail that includes detailed calculations for "object class categories" identified on the Budget Information Standard Form.

Project budget calculations must include estimation methods, quantities, unit costs, and other similar quantitative detail sufficient for the calculation to be duplicated. If matching or cost sharing is a requirement, applicants must include a detailed listing of any funding sources identified in Block 18 of the SF-424 (Application for Federal Assistance). See the table in *Section IV.2. Required Forms, Assurances, and Certifications* listing the appropriate budget forms to use in this application.

It is important to note that the applicant can present their budget justification in one document. For example, the narrative can be written as part of their line-item detail. The budget narrative and line-item budget does not need to be two separate documents, nor may the reviewer deduct points for this.

Helpful Questions for Evaluating a Budget

While the application can only be scored against the published criteria, you may consider these overarching questions in your review:

1. Does the budget align with the FOA goals and requirements? Are the costs in compliance with any funding restrictions (see *Section IV.5*)?
2. Does the total proposed budget appear consistent with the size and scope of the project? Can the applicant accomplish the activities and goals of the proposal with the total amount of money requested? Is the total amount of money requested reasonable or necessary to the activities proposed?
3. Does the proposed budget and budget justification relate logically to the narrative describing the project? Does the applicant's SF-424A and budget justification describe the same project as the project narrative?
4. Are the individual line items (e.g., personnel, travel, materials, and contractors) understandable in terms of what they will cost and what services will be rendered for the proposed project? Do the line items logically link to the activities in the proposed project? Are they necessary or reasonable to support the project?
5. Are there extraneous items of cost that do not appear necessary or reasonable in support of the proposed project? Are there any line items that do not link to activities outlined in the project narrative?
6. Do any individual line items appear inflated (or under-funded) compared to the overall scope or individual tasks proposed?
7. If contractors and/or partners are included, does the applicant provide detail as to how the costs are broken down? Do they accord with the program goals and objectives as listed in the FOA? Are they reasonable and feasible?

Writing Comments

Summary comments are based on the strengths and weaknesses of an applicant's response to the FOA's published evaluation criteria. **Panelists are not expected to comment on information in the application that does not pertain to the specific evaluation criteria.** Each comment must be written to reflect either a "strength" or "weakness" in the way the application addresses the criteria. Depending on how points are allocated for criteria (i.e., per each criterion or total sum of points across criteria), panelists must use the FOA as guidance in program priorities and goals and their professional expertise when writing comments on major strengths and weaknesses.

Furthermore, panelists must write comments that are as specific and detailed as possible. General statements such as, "This is a good program," are not helpful for making funding decisions. This statement does not provide the program office justification for funding an application. The comment must concisely present and evaluate what the application says in relation to the FOA evaluation criteria.

Panelists are asked to provide comments with examples from the application of the applicant's strong and weak points. The comments should be thorough, tactful, and constructive, not frivolous or disparaging. Comments must provide specific information about which elements of the criteria are being considered without reiterating the wording of the evaluation criteria.

Comments must not provide direct advice or technical assistance on how an applicant can improve their application. In writing comments, panelists should avoid hypothetical phrases such as "would have" and "should have," which may lead applicants to believe that following this advice on future applications would lead to success. For example, a comment providing technical assistance may read, "It would have improved the application if more grassroots, public meetings were scheduled during the two project years in order to solicit and gain community input." Comments should be written as factual statements such as: "The project did not propose sufficient approaches to soliciting community input during the project period."

Comments must reflect each reviewer's analysis and justify the score. In addition, it is important for panel members to note the page number from which the information is based. The page number needs to be cited from the actual document itself and not from the page numbers generated by the PDF copy.



The Final Panel Summary report represents ACF and the impartiality and professionalism of the reviewers, panel chairperson, and the entire peer review grant process. In writing comments, it is helpful to keep in mind that the strength and weakness comments agreed upon by the panel will be included in the Final Panel Summary report. Applicants will receive a copy of the Applicant Panel Summary report with the average cumulative score and comments to assess their responsiveness to the FOA. The names of reviewers and individual scores will not be released to applicants. As such, it is very important that comments are written grammatically correct, no misspellings, and reflect the analysis of panel members in review of the applicant's response to the FOA and evaluation criteria.

The program office will use the Final Panel Summary report to guide its funding decisions. However, as noted in *Section V.2. Objective Review and Results* of the FOA, "results of the competitive objective

review are taken into consideration by ACF in the selection of projects for funding; however, objective review scores and rankings are not binding. They are one element in the decision-making process.”

Guidelines for Writing Comments

1. Use complete sentences, proper grammar and spelling.
2. Include the application’s page numbers for each comment, where listed. (Since most program offices are using the ARM system, the application will be opened in a PDF copy with its own page numbers. It’s important to cite the page numbers denoted by the applicant and not the pages denoted by the PDF software.) If no page numbers are listed by the applicant, reference the section where the information was found.
3. If pages are removed either due to page limitations and/or formatting requirements, and the panel member finds that the information requested was part of removed pages, the panel member must base their comments only on the information provided in the application given to them to review. Panel members may want to speculate that missing pieces of the application (e.g., no resumes) were from sections removed to meet FOA formatting and page limitation requirements. However, they must not make such assumptions. In notating page numbers, the reviewer can either state “N/A,” “None,” or “No Page Found.”
4. Be specific, detailed, and concise. Justify each strength and weakness statement with examples from the application.
5. Be accurate, but tactful.
6. Evaluate, rather than merely describe.
7. Do not mix strengths and weaknesses in the same comment.

Helpful Words for Strengths

Adequate	Details	Focused	Sound
Appropriate	Documented	Innovative	Specify
Complete	Evidence	Justified	Strong
Comprehensive	Executes	Presents	Thorough
Convincing	Exhaustive	Provides	Unique
Demonstrates	Extensive	Qualified	
Describes	Feasible	Reasonable	

Helpful Words for Weaknesses

Ambiguous	Inadequate	Lacking	Sparse
Confusing	Inappropriate	Limited	Unclear
Contradictory	Incompatible	No Evidence	Undocumented
Discrepancy	Inconsistent	Obscure	Unrealistic
Does Not	Irrelevant	Opposing	Vague
Equivocal	Insufficient	Restrictive	Without

Verbs for Writing Summary Statements

Provides information about...	Presents	Discusses
Shows success in...	Reflects	Proposes
Provides details about...	Explains	Includes
Provides assurance that...	Details	Gives
Demonstrates experience...	Specifies	Supports
Describes procedures...	Ensures	Indicates
Plans to...	Identifies	Builds
Demonstrates...	Offers	

Examples of “More” and “Less” Useful Comments

The following statements illustrate the types of comments that might be written for a Project Approach, Project Implementation, or Budget section of an application. For each example, a comment that provides some information is presented, followed by a discussion of why the comment is unsatisfactory, which, in turn is followed by a more informative version of the comment.

Strengths

Less Useful: The applicant’s proposal is aligned with the program’s objective to prepare participants for employment in the healthcare sector.

Discussion: The comment simply restates what was written in the application without indicating why this point is significant.

More Useful: The proposed project is clearly aligned with the program’s objective to prepare participants for employment in the healthcare sector and leads to an industry-recognized certificate or degree. Specifically, the applicant proposes a program in which participants will receive training to become Certified Nursing Assistants (CNAs), initial job placement, and ongoing training to become Licensed Vocational Nurses (LVNs). (Pages 2-3)

Less Useful: Third-party Agreements are included in the application.

Discussion: The comment is too general and does not indicate the importance of this strength.

More Useful: The roles and responsibilities of all personnel and partners are described clearly in the proposal. For example, signed third-party agreements are attached for each community partner that describes the leadership, experience, and commitment of each, as well as a timeline for the completion of an MOU. (Pages 20-26)

Weaknesses

Less Useful: The budget justification lacks sufficient details.

Discussion: The comment does not give the basis for this conclusion.

More Useful: The budget does not provide adequate justification for the amounts requested. For example, the line item detail includes \$40,000 for travel, but does not provide calculations, unit costs, or estimation methods to show how the amount was derived. (Page 43)

Less Useful: The applicant’s method for determining outcomes and expected benefits is poor.

Discussion: The comment is vague and does not provide an explanation.

More Useful: The applicant’s method for determining outcomes and expected benefits lacks specificity. For example, no methods are presented for evaluating “training for low-income individuals.” (Page 23)

Comments Checklist

1. Is the information being commented on relevant to the specific evaluation criteria?
2. Does the comment address and justify how well the applicant addresses the evaluation criteria?
3. Does the comment indicate why the information is important?
4. Is the comment clear and concise?
5. Will an appraisal of the strengths and weaknesses for the criteria justify the score?

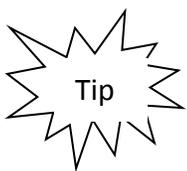
Scoring Applications

The program office has either allotted points per evaluative criterion statement or to each section of review criteria. If the program office did not specify points per criterion within the FOA, panels will have some discretion on how they allot points within each criteria section. Reviewers can use the full range of points unless there are specific allotted points per criterion. It is acceptable to give the maximum number of points for the criterion or zero points, as long as these extremes are sufficiently supported in the comments and the scores accord with the goals and priorities of the FOA. Most importantly, reviewers must be consistent with how they score all of the applications they review. For example, a reviewer must use the same analysis for each application they review and not review one more stringent and/or lenient from another.

The numerical scores that reviewer's assign to an applicant's response to the evaluation criteria must be consistent with the comments on the completed Panel Summary report compiled by the panel chairperson.

If the program office chooses not to assign points per criteria, please note that the number of criteria statements under each review section (e.g., project approach/work plan, organizational capacity and experience, project management and staffing, performance measurement and assessment, and budget) do not necessarily reflect an equal distribution of points among the criteria statements.

In these instances, during panel meetings, reviewers and the panel chairperson must identify the most significant strengths and weaknesses of the application and consider their relative importance when assigning scores for each criterion. For example, an application may have only two weakness comments under one review section and five strengths statements. If the two weaknesses are about small unimportant issues, the score would be higher. However, if the weakness statements are about critical issues to the project, the assigned score for that section must reflect this by being lower. Reviewers and the panel chairperson should always double-check scores to assure that the appropriate point scale has been used in relation to the comments written.



Comments must be written to justify the scores. Avoid comments that mix a strength and weakness statement. Either the applicant met the criteria or they did not.

Furthermore, reviewers need to review and score the application as a whole, assessing whether the applicant has provided consistent evidence in support of criteria. For example, an applicant may state in their narrative that their staff has extensive experience working with the target population, as required by the evaluation criteria. However, a further review of key personnel resumes may reveal a lack of experience working with the target population, and the applicant would thus have a weakness associated with this criterion and their score for the relevant criteria would be reduced accordingly.

Case Scenario

Reviewers are scoring an application for a program office using the FOA and the evaluation criteria. Under Project Approach and Work Plan, the criteria requests applicants to include “clear and measurable objectives and provide information about systems and processes that will support performance documentation, tracking, and reporting.”

In review of the application, reviewers wrote a strength statement for the applicant that stated, “The proposal presents clear and measurable objectives. For example, 95% of individuals will complete the program, 85% of those completing the program will demonstrate increased skills.” Reviewers then wrote a weakness statement that “the applicant does not provide information about systems that will support performance documentation, tracking, and reporting.”

The PAM sent this Panel Summary Report back because there was conflicting information. Under Project Approach they were given points for presenting clear and measurable objectives. Yet, if the applicant is being cited for having no system to measure these objectives under Performance Measurement and Assessment, reviewers must review the applicant on the whole and deduct points from both sections. The applicant does not have measurable objectives since they have no performance measurement system in place.

Helpful Hints on Scoring Applications

1. Score applications independently, not against one another.
2. Do not attempt to produce one or more “winning” applications by artificially raising scores. To do so would subvert the impartial peer review process. Likewise, panel members should not score an application with low scores to finish the review early.
3. Do not purposely score applications low to avoid receiving critical review by your SAM and/or PAM and finish the process early.
4. If the evaluation criterion includes any “requirements” of an application, with no indication that the requirement may be partially fulfilled, do not give points for an applicant that only meets the requirement half way. For example, if the evaluation criterion includes four points for identifying partners and the applicant demonstrates its ability to collaborate with several partners, but it does not identify any partners or demonstrate the partnership specific to the program, then the reviewer should score this as a weakness with 0 points.
5. Verify all scores and check that comments reflect scores. For example, if weakness statement is written in Program Approach in the Panel Summary report, the applicant should not receive a perfect score under Program Approach.
6. Ensure that the reviewer’s final scores do not vary more than a large point spread per criterion. For example, if the Approach is worth 40 points, you would not want reviewers’ scores to respectively be a 13, 26, and 39. There is a wide range of scores, and comments need to be written to justify scores. The range of scores signifies that there is some difference of opinion from reviewers as to how the applicant met the criteria. (Some program offices may define a point spread that describes an acceptable range of scores between/among reviewers). If scores differ to a wide degree, meet as a panel and discuss findings to move toward consensus on the points. In instances such as these, reviewers’ scores need not match one another, but the panel must try to reach some less marked

disparities as to the applicant's response to the FOA evaluation criteria.

7. The panel chairperson must read all comments in the Panel Summary report for accuracy with referenced page numbers, consistency with scoring and the FOA evaluation criteria, and good grammar prior to sending to the SAM and/or PAM.

Chapter 4 Review Questions

1. As part of the grant review process, the Reviewer is responsible for reading, scoring, and writing comments on their assigned applications. The Reviewer should write the initial comments and score the application before the panel discussions. True or False
2. In review of your first application, all panel members score the application high since the application was quite detailed and met the evaluation criteria. However, a few applications later, in review of another application that is in the same geographic area, you realize that the previous application was not as thorough as compared to the one you are reading. Furthermore, the application provides a noteworthy justification for much needed services in the area. As a panel, you all agree that scores need to be changed on the first application. Can you go back and change the scores and comments?

Answers can be found in [Appendix B](#)

APPENDIX A: Federal Forms

Administration for Children and Families
U.S. Department of Health and Human Services

Certification Form Regarding Conflict Of Interest, Confidentiality and Non-Disclosure for Reviewers of Grant Applications

Reviewers are individually responsible for evaluating their own affiliations and financial interest, and those of their close relatives and professional associates that relate to their duties as reviewers before they review any applications.

Conflict of interest is defined as: any action by a reviewer in the grants review or awarding process that would affect, or could appear to affect, the reviewer's financial interest, or would cause the reviewer's impartiality in the grants process to be questioned. Specific situations include, but are not limited to, the following: a reviewer may not participate in the review or award of a specific grant application in which any of the following has a financial interest:

1. the reviewer, the reviewer's spouse, parent, child, or partner;
2. any organization (including a parent or subsidiary) in which the reviewer, the reviewer's spouse, parent, child, or partner serves as officer, director, trustee, partner or is otherwise similarly associated;
3. any organization (including a parent or subsidiary) in which the reviewer, the reviewer's spouse, parent, child, or partner is negotiating for or has an arrangement concerning prospective employment or other similar association; or
4. any organization (including a parent or subsidiary) in which the reviewer, the reviewer's spouse, parent, child, or partner has an interest with respect to any pending grant application competing under the same program as any other grant application to be reviewed by the same committee or group of field researches.

I have read and understand the above definition of conflict of interest and have examined the attached list of applications to be reviewed, and hereby certify that, based on the information provided to me, I do not have a conflict of interest in any of them. If during the review there is an appearance of or actual conflict of interest, I will recuse myself from the review of the application or will obtain an appropriate waiver.

In addition, I fully understand the confidential nature of the evaluation and agree: (1) to destroy or return all materials related to the evaluation; (2) not to disclose or discuss the materials associated with the review, my evaluation, or the review meeting outside of that meeting or with any other individual except as authorized by the grants management officer; and (3) to refer all inquiries concerning the review to the grants management officer.

Application Reviewer

Print Name _____

Signature _____ Date _____

Attachment: List of applications to be reviewed.

Administration for Children and Families
U.S. Department of Health and Human Services

Grant Reviewer Special Concerns Form

Panels may use this form to identify any significant area where a grant application proposes to use federal funds to support inappropriate activities, including, but not limited to, using funds for inherently religious activities, such as prayer or religious instruction. **Unless the issues identified below are part of the published FOA evaluation criteria, reviewers cannot adjust the score based on these issues.**

Description of Reviewer Concerns

Applicant Name:	Application number:
Page number(s) or section(s) where concern(s) can be found:	
Description of Concern:	

Applicant Name:	Application number:
Page number(s) or section(s) where concern(s) can be found:	
Description of Concern:	

Applicant Name:	Application number:
Page number(s) or section(s) where concern(s) can be found:	
Description of Concern:	

Reviewer Identification and Signature

Name of Reviewer:	Daytime Telephone:
Signature:	Date:

Grant Reviewer Guide to Identifying Religious Issues

Persons who review applications for federally funded grants should be aware that faith-based organizations are eligible, on the same basis as other organizations, to participate in federal grant programs. The department does not discriminate against faith-based organizations on the basis of their religious character or affiliation. Yet, there are relevant restrictions as to how the projects may be carried out, as indicated in federal regulations at 45 CFR Part 87.1. This guidance is designed to ensure that any information in applications that potentially violates those regulations is identified and noted by grant reviewers in order that the awarding agency may resolve potential violations prior to awarding the projects.

As you review the applications, if answers to any of the following questions are “yes,” then please highlight the relevant area of the application and identify the concern on the *Grant Reviewer Special Concerns Form*:

1. Does the applicant propose to use the federal funds for “inherently religious” activities or curricula, which is any activity or curricula that supports or endorses religion? For example, does the applicant propose to integrate worship, religious instruction, or proselytization in the program?
2. Does the applicant organization propose to discriminate against applicants or program beneficiaries based on religion or religious belief?
3. Are the advertising, outreach, or recruitment efforts to promote the federally funded program targeted solely to religious groups? For example, does the application state that the federally funded program will only be publicized at church, or in a church newsletter, without identifying other ways that it will also be publicized to inform persons who don't attend church?
4. After receiving the award, does the applicant organization intend to select new project partners based upon religious considerations by, for example, only considering churches?

In contrast, reviewing staff should also be mindful of various measures that are protected under the rules, which means these activities should not be viewed as violations, as follows:

1. Faith-based organizations may still conduct religious activities and programs with private funds outside of the federally funded program, provided that the religious activities are separate in time or location from the federally funded program. The religious activities must also be voluntary for participants in the federally funded program.
2. Faith-based organizations are free to maintain their religious character, and therefore may conduct the federally funded program in a religious facility, such as church, mosque, or synagogue without removing religious art, icons, and symbols from the facility.

3. Faith-based organizations retain a legal exemption that means they can ordinarily consider the faith of job applicants when deciding whether to hire them.

If you are unsure as to whether any particular area of concern does or does not comply with the rules, then we ask that you err on the side of caution by noting the concern on the *Grant Reviewer Special Concerns Form* and the federal staff will look into the matter prior to awarding.

APPENDIX B: Review Questions and Answers

Chapter 2 Review Questions

1. As a reviewer or panel chairperson, can you create your own template of the evaluation criteria to assist during the review if it is based on some of the information in the published FOA and FOA evaluation criteria?

No, panel chairpersons must use the published evaluation criteria to review applications and not create their own templates based on FOAs to be used during the review.

2. There is an 80-page limit for the application and an applicant references a website within their approach. The link brings the panel to more information on their program since they did not have space to include their organizational capacity and experience related to the project. As a reviewer or panel chairperson, can you look this information up since it is referenced in their submitted application?

No, reviewers and/or the panel chairperson may not seek additional outside information on the application or organization in review even if a link is provided in the application.

3. The panel chairperson is responsible for writing initial comments for the application in review. True or False

False. Reviewers are responsible for individually and independently writing initial comments reflective of the applicant's response to FOA evaluation criteria. The panel chairperson, with reviewers' assistance, compiles and edits comments for the Final Panel Summary report.

4. You have submitted a Panel Summary report to your SAM or PAM, and they return it to the panel because the comments reflect a significant weakness. Can the SAM or PAM request that you reduce the score by five points?

No, federal staff (e.g., SAM or PAM) cannot direct a panel to give a certain numerical score to a particular section.

Can the SAM or PAM request that you rewrite the comments to reflect what is requested in Section V.1 of the FOA?

A SAM or PAM can, however, direct a panel to revisit scoring if the comments do not match the scores or to review and, if necessary, revise comments to match the scores. As a panel, you must review the SAM's or PAM's comments and see if more information needs to be provided to strengthen and justify the comment and current score or revise the scores to a point spread agreed upon by the panel.

Chapter 3

Review Questions

1. In review of an application, there is a question regarding the applicant's proposal. The Panel Chairperson can contact the applicant to clarify the question. True or False.

False. Reviewers or panel chairpersons must never contact applicants concerning the review process of their application before, during, or after the grant review process. Confirmed reports of any breach of confidentiality will result in immediate dismissal from the review and possible removal from the ACF reviewer database.

2. An applicant can use federal funds to conduct both secular and inherently religious activities to ensure that the community is provided with an option of services based on a participant's religious preferences. True or False

False. According to 45 CFR § 87.1(c), Equal Treatment for Faith-Based Organizations, "Organizations that receive direct financial assistance from the [Health and Human Services] Department under any Department program may not engage in inherently religious activities such as religious instruction, worship, or proselytization as part of the programs or services funded with direct financial assistance from the Department." Please also reference the Grant Reviewer Guide to Identifying Religious Issues in [Appendix A](#).

Chapter 4

Review Questions

1. As part of the grant review process, the Reviewer is responsible for reading, scoring, and writing comments on their assigned applications. The Reviewer should write the initial comments and score the application before the panel discussions. True or False

True. For more information, please see [reviewer's responsibilities](#) during the review.

2. In review of your first application, all panel members score the application high since the application was quite detailed and met the evaluation criteria. However, a few applications later, in review of another application that is in the same geographic area, you realize that the previous application was not as thorough as compared to the one you are reading. Furthermore, the application provides a noteworthy justification for much needed services in the area. As a panel, you all agree that scores need to be changed on the first application. Can you go back and change the scores and comments?

No. Each application must be judged on its own merits and not compared to other applications. Scores and/or comments cannot be changed.

Administration for Children and Families
U.S. Department of Health and Human Services

Legal Safeguards: Separate Religious Programs

1. Separate and Distinct Programs

Any program with religious content must be a separate and distinct program from the federally funded program, and the distinction must be completely clear to the consumer. Some of the ways in which this may be accomplished include, but are not limited to, the following examples:

- Creating separate and distinct names for the programs;
- Creating separate and distinct looks for the promotional materials used to promote each program; and
- Promoting *only* the federally funded program in materials, websites, or commercials purchased with *any portion* of the federal funds.

Note: If an organization offers both a federally funded program and a religious program that both provide the same social service, or the clients served are children, it is very important that the separation between the programs be accentuated.

45 CFR 87.1 (c). (“Organizations that receive direct financial assistance from the Department under any Department program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization, as part of the programs or services funded with direct financial assistance from the Department.”) 69 Fed. Reg. 42586, 42593 (2004).

2. Separate Presentations

Completely separate the presentation of any program with religious content from the presentation of the federally funded program by time or location *in such a way that it is clear that the two programs are separate and distinct*. If separating the two programs by time but presenting them in the same location, one program must *completely* end before the other program begins.

Some of the ways in which separation of presentations may be accomplished include, but are not limited to, the following examples:

- The programs are held in completely different sites or on completely different days.
- The programs are held at the same site at completely different times.

Separation may be accomplished through such means as:

- Have sufficient time between the two programs to vacate the room, turn down the lights, leave the stage, etc., in order to reasonably conclude the first program before beginning the second;
- Completely dismiss the participants of the first program;

- The second program could follow in the same room or, where feasible, in a different room to further distinguish the difference between the programs.
- The programs are held in different locations of the same site at the same time.

Separation may be accomplished through such means as:

- Completely separate registration locations; and
- Completely separate areas where programs are held, such as by room, hallway, floor, etc.

45 CFR 87.1. (c). (“If an organization conducts [inherently religious] activities, the activities must be offered separately, in time or location, from the programs or services funded with direct financial assistance from the Department . . .”). 69 Fed. Reg. 42586, 42593 (2004).)

3. Religious Materials

Eliminate all religious materials from the presentation of the federally funded program. This includes:

- Bibles or other books of worship;
- Registration materials that include religious inquiries or references;
- Follow-up activities that include or lead to religious outreach; and
- Religious content in materials.

45 CFR 87.1. (c). (“If an organization conducts [inherently religious] activities, the activities must be offered separately, in time or location, from the programs or services funded with direct financial assistance from the Department . . .”). 69 Fed. Reg. 42586, 42593 (2004).)

4. Cost Allocation

Demonstrate that federal funds are only being used for the federally funded program. Some of the ways in which separation of funds may be accomplished include, but are not limited to, the following examples:

- Implement the use of time sheets that keep track of all staff hours charged to the federally funded grant, whether the staff work in other programs or not.
- Require any staff working in both federally funded programs and other programs to clearly indicate how many hours are spent on each program.
- If any staff works on both a federally funded program and a non-federally funded program at the same site on the same day, require the staff to clearly indicate not only how many hours are spent on the federal program, but also which specific hours are spent on the federal program. The hours should reflect that time spent on any program with religious content have been completely separated from hours spent on the federally funded program.
- Show cost allocations for all items and activities that involve both programs, such as staff time, equipment, or other expenses such as travel to event sites.

This may be accomplished through such means as:

- Example: if transportation is used to go to a site where a federally funded program is conducted and a religious or non-religious program funded through other means is also conducted by the grantee at the same site, one-half of the travel costs (gas, lodging, etc.) should be charged to the federal program. If *three* separate and distinct programs are conducted at a site by a federally funded grantee and one of them is the federally funded program, only one-third of the travel costs should be charged to the federal program, etc.
- Example: if an electronic device is used 30% of the time for the federally funded program, this should be demonstrated through clear record keeping. Only 30% of the cost of the electronic device should be charged to the program.

OMB Circular A-122, Attachment A. § A.4.a.(2); 45 CFR 87.1.

5. Advertisements

Federally funded programs cannot limit advertising the grant program services exclusively to religious target populations.

45 CFR 87.1 (e). (“An organization that participates in programs funded by direct financial assistance from the department shall not, in providing services, discriminate against a program beneficiary or prospective beneficiary on the basis of religion or religious belief.”)

6. Availability of other Programs

After the federally funded program has ended, a grantee may provide a brief and non-coercive invitation to attend a separate religious program.

The invitation should make it very clear that this is a separate program from, and not a continuation of, the federally funded program. It must also be clear that participants are not required to attend the separate religious program, and that participation in federally funded programs are not contingent on participation in other programs sponsored by the grantee organization.

Religious materials, such as a registration that includes religious follow-up, may only be provided in the privately funded program rather than the federally funded program.

45 CFR 87.1 (c). (“participation [in any privately funded inherently religious activities] must be voluntary for beneficiaries of the programs or services funded with [direct federal financial assistance”). 69 Fed. Reg. 42586, 42593 (2004).

Frequently Asked Questions and Answers Concerning Equal Treatment for Faith-Based Organizations

The following are answers to commonly asked questions (“Q and A”) that may arise in ACF-funded programs. Where specific programs are identified, the principles are also intended to be useful in other similar program contexts. If you have questions that are not answered here, please consult your SAM and/or PAM.

I. Availability of Other Programs

Q1: Can a federally funded program for youth, such as a teen pregnancy prevention program, initiate loudspeaker invitations to attend separate religious activities that will be held in another room of the facility?

A1: Yes, as long as the invitations are non-coercive and clear that attendance is voluntary. As participants are minors in this case, the program should obtain parental consent to invite the youth to the religious activities. Parental consent will help ensure that any participation is voluntary. The service provider should not pay for the cost of religious services with federal funds.

Q2: If a federal grant recipient is funded either to provide services first-hand or to refer persons to other organizations for services, may the grant recipient refer persons to a faith-based organization?

A2: Yes. Typically, an organization working with other “project partners” or similar affiliate organizations may decide which of those other entities are appropriate for referral in view of their qualifications, availability, and accessibility. Similarly, if a federally supported organization makes a referral because a beneficiary or prospective beneficiary objects to the religious character of the organization providing services, then staff should consider whether the alternative is in a “reasonable geographic proximity.” In either of these circumstances, if a religiously affiliated provider is the most appropriate alternative for the program participant, then the referring organization may ask the beneficiary or prospective beneficiary whether he or she has any objections to that alternative. If an applicant or program participant is referred to other services that are federally funded or part of a federally funded program, then those services may not include explicitly religious content.

Q3: Can a federally funded organization provide applicants and beneficiaries with a list of other available programs that includes programs with explicitly religious content?

A3: Yes. If the organization has developed a list of “available programs,” rather than recommended programs or referrals, based upon religiously neutral criteria such as service providers in the immediate geographic region, then that list may include programs with secular content and programs with explicitly religious content.

II. Separate and Distinct Programs

Q4: May a federally funded abstinence education provider, for example, make religious counseling available to teen beneficiaries?

A4: Yes, as long as the religious counseling is requested voluntarily by the program participants, the counselors are not paid with federal funds, and their counseling services are not performed at the same time or location as the federally funded services, then the service provider may make religious counseling available. As recommended earlier, where the program participants are minors, the provider should obtain parental consent to invite the youth to religious counseling.

III. Advertising and Recruitment

Q5: Does the prohibition against using criteria to select beneficiaries based on religion in federally funded programs mean that funded service providers must ensure that program participants represent a variety of faith traditions?

A5: No. Federally funded programs need to be accessible to the general public regardless of the faith or lack of faith of applicants and participants. This does not mean that a legal concern necessarily exists where most participants in a target area are of a single religious tradition because, for example, the program is located in a region where the population is predominantly one faith tradition. The representation of religious backgrounds among those attending a program may vary for reasons unrelated to the recipient's eligibility criteria. Yet, a federally funded service provider is prohibited from selecting a target group of participants, or tailoring recruitment efforts, based on religious affiliation.

APPENDIX D: ACF Grant Review Feedback Forms

To be completed by the program office				
Type of Review:				
Remote	On-site	Hybrid	Length of Review	_____
# of Applications per Review Panel _____				

**ACF Grant Review Feedback
Grant Reviewers' Form**

Dear Grant Review Participant,

Your feedback is valuable. Please take a few minutes to complete our survey. We would especially appreciate comments for items that did not meet your satisfaction so we may further improve future grant review sessions. Your feedback is confidential and will not be shared with other members of your panel or the public. Thank you.

Evaluation of Panel Chairperson

Name of Panel Chairperson: _____

<i>1. The panel chairperson clearly established administrative and procedural rules for the review (e.g., established a schedule, ensured reviewers had received all needed materials, provided information on confidentiality and conflict of interest, etc.).</i>				
Strongly Disagree	Disagree	Agree	Strongly Agree	N/A

<i>2. The panel chairperson instructed reviewers to use only the guidance from the FOA evaluation criteria in evaluating applications.</i>				
Strongly Disagree	Disagree	Agree	Strongly Agree	N/A

<i>3. The panel chairperson effectively led daily panel discussions and facilitated meetings.</i>				
Strongly Disagree	Disagree	Agree	Strongly Agree	N/A

<i>4. The panel chairperson effectively resolved any differences of opinion that arose between reviewers in regard to scoring applications.</i>				
Strongly Disagree	Disagree	Agree	Strongly Agree	N/A

<i>5. The panel chairperson effectively led the process of developing the Panel Summary reports.</i>				
Strongly Disagree	Disagree	Agree	Strongly Agree	N/A

<i>6. Overall, the panel chairperson was effective in managing this review.</i>				
Strongly Disagree	Disagree	Agree	Strongly Agree	N/A

Please include any additional comments in the space below:

Evaluation of the Overall Grant Review Process

1. *The training I received was effective in preparing me for the grant review process.*

Strongly Disagree Disagree Agree Strongly Agree N/A

2. *The type of review (i.e., remote, on-site, or hybrid) was appropriate and effective.*

Strongly Disagree Disagree Agree Strongly Agree N/A

3. *The guidance I received from the program office was consistent with the FOA, including the FOA's evaluation criteria.*

Strongly Disagree Disagree Agree Strongly Agree N/A

4. *The time allotted for me to review each application thoroughly, given the number of applications assigned to my panel, was sufficient.*

Strongly Disagree Disagree Agree Strongly Agree N/A

5. *I received a clear explanation of the confidentiality requirements regarding information about applications and grant review comments and scores.*

Strongly Disagree Disagree Agree Strongly Agree N/A

6. *Overall, I feel that the grant review process was effective in identifying the strongest applicants.*

Strongly Disagree Disagree Agree Strongly Agree N/A

7. *Overall, I had a positive experience with this review.*

Strongly Disagree Disagree Agree Strongly Agree N/A

Please include any additional comments in the space below:

To be completed by the program office

Type of Review:

Remote On-site Hybrid Length of Review _____

of Applications per Review Panel _____

ACF Grant Review Feedback Panel Chairperson's Form

Dear Panel Chairperson,

Your feedback is valuable. Please take a few minutes to complete our survey. We would especially appreciate comments for items that did not meet your satisfaction so we may further improve future grant review sessions. Your feedback is confidential and will not be shared with other members of your panel or the public. Thank you.

Evaluation of the Overall Grant Review Process

1. *The training I received effectively prepared me for the grant review process.*

Strongly Disagree Disagree Agree Strongly Agree N/A

2. *The type of review (i.e., remote, on-site, or hybrid) was appropriate and effective.*

Strongly Disagree Disagree Agree Strongly Agree N/A

3. *The guidance I received from the program office was consistent with the FOA, including the FOA's evaluation criteria.*

Strongly Disagree Disagree Agree Strongly Agree N/A

4. *I received clear instructions on managing grant reviewer conflict of interest.*

Strongly Disagree Disagree Agree Strongly Agree N/A

5. *I received clear explanations on the confidentiality requirements regarding information about applications and grant review comments and scores.*

Strongly Disagree Disagree Agree Strongly Agree N/A

6. *Overall, I feel that the grant review process was effective in identifying the strongest applicants.*

Strongly Disagree Disagree Agree Strongly Agree N/A

7. *Overall, I had a positive experience with this review.*

Strongly Disagree Disagree Agree Strongly Agree N/A

Please include any additional comments in the space below:

Evaluation of Panel Reviewers

Please complete for each reviewer

Reviewer's Name: _____

1. *The reviewer was knowledgeable about the subject matter related to this review.*

Strongly Disagree Disagree Agree Strongly Agree N/A

2. *The reviewer had adequate computer skills.*

Strongly Disagree Disagree Agree Strongly Agree N/A

3. *The reviewer attended all required trainings and meetings.*

Strongly Disagree Disagree Agree Strongly Agree N/A

4. *The reviewer respected and worked cooperatively with other panel members.*

Strongly Disagree Disagree Agree Strongly Agree N/A

5. *The reviewer read and clearly understood the applications being reviewed, the funding opportunity announcement, and the evaluation criteria.*

Strongly Disagree Disagree Agree Strongly Agree N/A

6. *The reviewer's summary comments were well-written, specific, constructive, and based on the strengths and weaknesses of an application's response to the evaluation criteria.*

Strongly Disagree Disagree Agree Strongly Agree N/A

7. *The reviewer assigned applications scores that were consistent with written comments.*

Strongly Disagree Disagree Agree Strongly Agree N/A

8. *I would recommend this reviewer for future panel reviews.*

Strongly Disagree Disagree Agree Strongly Agree N/A

Reviewer's Name: _____

1. *The reviewer was knowledgeable about the subject matter related to this review.*

Strongly Disagree Disagree Agree Strongly Agree N/A

2. *The reviewer had adequate computer skills.*

Strongly Disagree Disagree Agree Strongly Agree N/A

3. *The reviewer attended all required trainings and meetings.*

Strongly Disagree Disagree Agree Strongly Agree N/A

4. *The reviewer respected and worked cooperatively with other panel members.*

Strongly Disagree Disagree Agree Strongly Agree N/A

5. *The reviewer read and clearly understood the applications being reviewed, the funding opportunity announcement, and the evaluation criteria.*

Strongly Disagree Disagree Agree Strongly Agree N/A

6. *The reviewer's summary comments were well-written, specific, constructive, and based on the strengths and weaknesses of an application's response to the evaluation criteria.*

Strongly Disagree Disagree Agree Strongly Agree N/A

7. *The reviewer assigned applications scores that were consistent with written comments.*

Strongly Disagree Disagree Agree Strongly Agree N/A

8. *I would recommend this reviewer for future panel reviews.*

Strongly Disagree Disagree Agree Strongly Agree N/A

Reviewer's Name: _____

1. *The reviewer was knowledgeable about the subject matter related to this review.*

Strongly Disagree Disagree Agree Strongly Agree N/A

2. *The reviewer had adequate computer skills.*

Strongly Disagree Disagree Agree Strongly Agree N/A

3. *The reviewer attended all required trainings and meetings.*

Strongly Disagree Disagree Agree Strongly Agree N/A

4. *The reviewer respected and worked cooperatively with other panel members.*

Strongly Disagree Disagree Agree Strongly Agree N/A

5. *The reviewer read and clearly understood the applications being reviewed, the funding opportunity announcement, and the evaluation criteria.*

Strongly Disagree Disagree Agree Strongly Agree N/A

6. *The reviewer's summary comments were well-written, specific, constructive, and based on the strengths and weaknesses of an application's response to the evaluation criteria.*

Strongly Disagree Disagree Agree Strongly Agree N/A

7. *The reviewer assigned applications scores that were consistent with written comments.*

Strongly Disagree Disagree Agree Strongly Agree N/A

8. *I would recommend this reviewer for future panel reviews.*

Strongly Disagree Disagree Agree Strongly Agree N/A