ADMINISTRATION FOR NATIVE AMERICANS

PRE-APPLICATION

A GUIDE TO DEVELOPING AND WRITING YOUR ANA APPLICATION

DECEMBER 2015

Boozhoo. Aloha. Bezon. Ta na á née see. Qaĝaasakung. Dagot'ee. Nayaafabaa. Mique wush. Khahowya. O-si-yo.[1°]

Welcome to the Administration for Native Americans (ANA) Pre-Application Training. The goal of this training is to help you develop and write an application that will help you secure funding for your project idea. This manual gives tips on writing your application and guidance on submitting your application on Grants.gov. It also provides information on how your application will be reviewed and scored. We hope this manual will be beneficial in helping you to better understand the ANA application process.

ANA offers two workshops prior to the ANA application deadline:

- The ANA Project Planning and Development Workshop
- The ANA Pre-Application: Application Development Workshop

The table below shows the difference between our Project Planning and Development and Pre-Application: Application Development Trainings.

What you will learn in Project Planning and Development	What you will learn in Pre-Application: Application Development
Methods to describe long range community goals	Building an application around FOA criteria
How to document community problems and assets	Guidance on how to apply for funding through grants.gov
Community – based planning processes and tools	The process of reviewing applications for funding

Eighty percent of the time spent in preparing a well-crafted application that will benefit a community should go into project planning and development and only 20% into the writing of the application. This training focuses on that 20% of the work time used in writing a successful application.

[1°] Greetings in Ojibwe, Hawaiian, Shawnee, Plains Apache, Aleut, White Mountain Apache, Inupiaq, Ute, Chinook, Cherokee

The community's involvement in project development is an essential component of designing a successful project. ANA supports community-based projects that reflect the cultural values, collective vision, and social and economic development goals of Native communities. We emphasize this theme of working with the community throughout this training.

The goal of this training is to help you develop a competitive application to submit to ANA. Always begin by looking at the most current ANA Funding Opportunity Announcement (FOA). This training will move through a series of activities that focus on taking elements of a well-designed project and placing them into the format of an ANA application. We will then cover, step-by-step, the application submission process through Grants.gov. And finally, the training concludes with an overview of the Application Review Process, highlighting the Peer Review Process and ANA's Internal Review methodology.

Throughout this manual, "tribes" refers to federally recognized and non-federally recognized tribes, while "organizations" denotes native nonprofit organizations. Native Americans, as used in this manual, include American Indians, Alaska Natives, Native Hawaiians, Natives of American Samoa, and the Native peoples of Guam and the Northern Mariana Islands.

Thank you for attending this training or downloading this manual. We think there is a lot of great information on how to write a successful and sustainable community project application. If you come across anything you think we should revise during the training or in reading this manual, please let us know.

Yawʌkó. Miigwech. Gunalchéesh. Fa'afetai. Nia:wen[2]

[2] Thank you in Oneida, Anishinaabemowin, Tlingit, Samoan, Mohawk

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Abbreviations and Acronyms

Term	Definition
ACF	Administration for Children and Families
AOR	Authorized Organizational Representative
CFDA	Catalog of Federal Domestic Assistance
DUNS	Data Universal Numbering System
EMI	Esther Martinez Initiative
ERE	Environmental Regulatory Enhancement
FOA	Funding Opportunity Announcement
FTE	Full Time Equivalent
HHS	Department of Health and Human Services
IDC	Indirect Costs
I-LEAD	Initiative for Leadership, Empowerment, and Development
NAPA	Native American Programs Act of 1974, as amended
NFS	Non-Federal Share
NLCC	Native Language Community Coordination
OWP	Objective Work Plan
P & M	Preservation and Maintenance
SAM	System for Award Management
SEDS	Social and Economic Development Strategies
SEEDS	Sustainable Employment and Economic Development Strategies
T/TA	Training and Technical Assistance

About the Administration for Native Americans (ANA)

ANA is committed to helping local partners build strong communities and believes a community-building, community-based planning process should be used to develop projects. ANA's mission and history support community development as the path towards Native American communities achieving self-sufficiency and cultural and language preservation.

ANA History and Priorities

In January 1964, President Lyndon B. Johnson announced the War on Poverty, a series of legislative initiatives that included the foundation for ANA. President Johnson's War on Poverty called on communities to prepare "long-range plans for the attack on poverty." Eight months later, the Economic Opportunity Act was signed into law, and shortly thereafter the Office of Economic Opportunity (OEO) began awarding grants.

Early in the 1970s, the OEO was terminated, but several of its programs were continued. Established in 1974 through the Native American Programs Act (NAPA), the Administration for Native Americans embraced the goal of Native American self-determination, first endorsed by President Johnson in 1968 and later by President Richard Nixon.

Today, ANA is housed in the U.S. Department of Health and Human Services, Administration for Children and Families and serves all Native Americans, including federally recognized tribes, American Indian and Alaska Native organizations, Native Hawaiian organizations and Native communities throughout the Pacific Basin. ANA's mission is to promote the self-sufficiency of Native Americans and our philosophy of self-sufficiency is based on the following core beliefs:

- A Native community is self-sufficient when it can generate and control the resources necessary to meet its social and economic goals and the needs of its members.
- The responsibility for achieving self-sufficiency resides with Native governing bodies and local leadership.
- Progress towards self-sufficiency is based on efforts to plan and direct resources in a comprehensive manner consistent with long-range goals.

ANA promotes self-sufficiency for Native Americans by providing discretionary grant funding for community-based projects and training and technical assistance to eligible tribes and Native organizations in three program areas: Social and Economic Development Strategies, Native Languages, and Environmental Regulatory Enhancement.

Note: There will be several cross cutting changes to the FOAs this year. A couple of the changes are administrative. A new policy requires compliance with background checks and applicable child safety laws. Funding restrictions will be updated to comply with 45 CFR 75, the new grants management regulations. Program areas of Interest are also being updated in several FOAs.

Social and Economic Development Strategies (SEDS)

ANA promotes social and economic self-sufficiency in communities through SEDS grants. These competitive financial assistance grants support locally determined projects designed to reduce or eliminate community problems and achieve community goals.

This approach to promoting self-sufficiency encourages communities to shift away from programs that create dependency on services and move towards projects that increase community and individual productivity through community development. SEDS grants fund social and economic development projects in both on- and off-reservation communities and provide federal support for self-determination and self-governance among Native American people.

SEDS also provides governance funding. The governance component under the SEDS programs assists tribes with the development and implementation of projects that support and enhance tribal sovereignty and operational effectiveness.

Under the SEDS program area, ANA also provides funding for Sustainable Employment and Economic Development Strategies (SEEDS) projects. Four priorities that ANA promotes through the SEEDS initiative are: 1) the creation of sustainable employment opportunities; 2) the provision of professional training and skill development to increase participants' employability and earning potential; 3) the creation and development of small businesses and entrepreneurial activities, and; 4) a demonstrated strategy for and commitment to keeping jobs and revenue generated by project activities within the Native communities being served.

Note: ANA has announced the Native Youth Initiative for Leadership, Empowerment, and Development (I-LEAD) this year. This initiative will emphasize a comprehensive, culturally-appropriate, approach to ensure all young Native people can thrive and reach their full potential by fostering Native youth resilience, capacity building, and leadership.

Note: ANA will no longer have two categories of funding in the SEDS competition. In addition, the NABI competition has been discontinued. Applicants wishing to conduct an IDA program may apply for a SEDS grant to help with administration and apply separately to AFI for the IDA program.

Funded SEDS Project

The Santa Ana people live north of Albuquerque, New Mexico. The Pueblo has a current tribal population of 850 members. Tribal members have traditionally depended upon agriculture as a way of life. Over the past several years participation in agriculture among tribal members has decreased. Only 42 tribal members (5%) are currently involved in any form of agricultural activity and only about 10% of the current Pueblo economy is based on the use of its agricultural land.

As a result, the majority of the arable, productive river bottom land adjacent to the Rio Grande is left fallow. Santa Ana has a total of 650 acres of this river bottom land that in years past has been utilized. Currently, the total utilization by the tribe is 125 acres and this figure includes the 75 acres farmed by the Agricultural Department (19%). No significant income is generated for the tribe through agriculture and the young people are losing touch with agricultural practices.

Through this SEDS project, the Santa Ana Agricultural Enterprises Department is using this fallow acreage to increase agricultural employment and generate agriculturally derived income from Pueblo lands.

- Project Title: **Vineyard Project**
- Award Amount: **$817,369**
- Project Period: **Sept 2012 - Sept 2016**

Note: There will be new language in the SEEDS FOA under Purpose that will more clearly define the type of projects ANA will fund in this competition. Project participant training must be directed towards a specific industry. In addition, the recipient will be directly responsible for achieving both of the ANA-required outcomes expected and may not act as a pass-through entity. The other change to SEEDS is a reduction in the Federal ceiling amount to $400,000 per year.

Funded SEEDS Project

Thunder Valley Community Development Corporation, established as a community development organization in 2006, focuses on addressing the social, economic, and cultural issues facing Native youth on the Pine Ridge Reservation. Thunder Valley CDC's mission is to empower Lakota youth and families to improve the health, culture and environment of our communities through the healing and strengthening of cultural identity. Thunder Valley's SEEDS funding focuses on the growth of a housing construction industry on Pine Ridge that will have long-term impact and implications for Pine Ridge in terms of job creation and housing development.

The project goal is to develop the skills and capacity of Oglala Lakota tribal members to obtain and retain employment in the sustainable construction industry; and to catalyze job growth in this industry on the Reservation by providing homeownership training, tailored counseling and loan packaging that will generate demand for housing by making it affordable and attainable.

- Project Title: **Workforce Development through Sustainable Construction Project**
- Award Amount: **$2,595,629**
- Project Period: **Sept. 2014 – Sept. 2019**

Native Languages

ANA believes language revitalization and continuation are essential to preserving and strengthening a community's culture. Use of Native language builds identity and encourages communities to move toward social unity and self-sufficiency.

Recognizing that the history of federal policies toward Indian and other Native people has resulted in a dramatic decrease in the number of Native American languages, Congress enacted the Native American Languages Act. This program is authorized under Section 803C of the Native American Programs Act of 1974, U.S.C. 2991b. The intent of the Act is to assist Native communities to reverse this decline. Three decades later, Congress passed the Esther Martinez Native American Languages Preservation Act (P.L. 109-394) in 2006. This law amends the Native American Programs Act of 1974 to provide for the revitalization of Native American languages through Native language immersion and restoration programs.

ANA Native Language funding has two standing categories: 1) Preservation and Maintenance (P & M) funding provides opportunities to assess, plan, develop and implement projects including restoration projects to ensure the survival and continuing vitality of Native languages and 2) the Esther Martinez Initiative (EMI) which supports immersion projects and survival schools.

Note:

1. This year ANA announced a new initiative: Native Language Community Coordination Initiative Demonstration Project (NLCC). This initiative is intended to address gaps in community coordination across the Native language educational continuum, creating a seamless path for Native language acquisition across generations for educational and economic success.

2. ANA has also made some modifications to both P & M and EMI project requirements. Anticipated changes include:

- **ANA will conduct a national language post award training and networking opportunity for all new Native Language grantees. This meeting will be held in a centralized location within the continuous 48 states.**
- **This is a mandatory training only in the first budget period for the project director and financial administrator to attend.**
- **Applicants should follow their own travel policies to budget for this two day meeting. This training will be held in late fall.**

3. There will be a new evaluation sub criteria for all language applications. This sub criteria will evaluate the subsection under Needs for Assistance that addresses the current status of the language.

4. ANA will be requiring a program performance evaluation plan beginning with the 2016 FOAs for all Native Language applications. Specific requirements for the plan are in the FOA. The purpose of this evaluation plan is to provide project management with a mechanism for monitoring project implementation and identifying necessary operational adjustments that may need to be made in the course of the project.

5. There will be a new definition for “language immersion”. Impact of the definition is that EMI funds Survival Schools and language nests only. Restoration projects will be funded under Planning and Maintenance.

Funded P & M Language Project

Western influences have eroded the Chamorro language, and English has become the predominant language spoken in Guam. Few elders remain who are knowledgeable of the traditional chanting practices used to teach the language. PIPIT’s (Para I Probechu’n I Taotao-ta, Inc.) Language Preservation and Maintenance project focuses on preserving the Chamorro language through the revitalization of the traditional chanting of “Kantan Chamorrita”. PIPIT is a cultural non-profit organization incorporated in Guam. The project focus is to increase the speaking/usage of the Chamorro language through the revitalization of the traditional practice of “Kantan Chamorrita”.

This project’s focus is to increase the speaking/usage of the Chamorro language through the revitalization of the traditional practice of “Kantan Chamorrita”. That will be accomplished by apprenticing four (4) Fafana’gues, leaders of organized Gumas (cultural houses) with elders to learn the use of “Kantan Chamorrita” and increase their ability to speak/use the Chamorro language on a daily basis through that process. The Fafana’gue will then train 210 cultural practitioners, members of organized Gumas, increasing their ability to speak/use the Chamorro language in community settings.

In addition to establishing an apprenticeship program, PIPIT will produce CDs and DVDs as learning tools to increase the speaking/community usage of the Chamorro language. The project will produce 300 CDs and 300 DVDs to be use as learning tools to increase the language use. Members of the Chamorro community age 30 and below are the population targeted by this element of the project.

- Project Title: **Chamorro Language through the Revitalization of the Traditional Chanting of "Kantan Chamorrita"**
- Award Amount: **$824,935**
- Project Period: **Aug 2015 - July 2018**

Funded EMI Language Project

Sauk (Sac), a member of the Central Algonquian division of the Algic language family closely related to Fox (Meskwaki) and Kickapoo, is spoken by only a handful of Sac and Fox tribal members in central Oklahoma. The rate of language loss among the Sauk people in the past ten years has accelerated rapidly as many older speakers have passed away.

This project connects tribal youth to immersion Sauk language learning through Sauk language high school courses and the Sauk Language Summer Youth Internship Program. It engages youth with the Sauk language in incremental, progressive steps. This long-term strategy leads to the dual accomplishments of advanced Sauk language proficiency and the development of the specific skill sets, in participating youth, needed to teach native languages.

The project builds on the foundation of a Sauk Master Apprentice Program. The existing Master Apprentice method focuses on language acquisition. It does not specifically address the overall development of apprentices as teachers and leaders for ongoing and future language revitalization work.

- Project Title: **The Sauk Language Youth Initiative Project**
- Award Amount: **$695,335**
- Project Period: **Aug 2013– July 2016**

Environmental Regulatory Enhancement

Growing awareness of environmental concerns on Indian lands resulted in ANA dedicating funding to address those issues. ANA's Environmental Regulatory Enhancement (ERE) grants provide tribes with resources to develop legal, technical, and organizational capacities for protecting their natural environments.

Environmental Regulatory Enhancement projects focus on environmental programs in a manner consistent with tribal culture and can include environmental issue identification, and the development, implementation and enforcement of regulations.

Funded Environmental Project

The Sitka Tribe of Alaska (STA) serves over 4,095 citizens of Tlingit, Haida, Aleut, and Tsimshian heritage. The Sheet'ka Kwaan, or traditional territory of the Sitka Tribe, encompasses the western coast of Baranof Island, the southern half of western Chichagof Island, and many smaller islands. The territory extends into Peril Straits, which separates Baranof and Chichagof Islands.

Harmful algal blooms (HABs) are becoming more prevalent in southeast Alaska. Paralytic shellfish poisoning (PSP) is the human intoxication that results from the consumption of seafood, primarily bivalve mollusks, contaminated with natural, algal-derived toxins known as paralytic shellfish toxins. Increasingly, evidence is emerging to suggest that climate change has contributed to the worldwide increase in the duration, frequency, and geographical distribution of HABs

The project's goal is to support the ongoing monitoring efforts on HAB and PSP levels by establishing a U.S Food and Drug Administration certified regulatory biotoxin lab capable of analyzing shellfish tissue for toxins in Sitka, Alaska. The lab will follow all regulatory standards set forth by the National Shellfish Sanitation Program and the U.S. Food and Drug Administration and will provide accurate shellfish toxin levels for each of their sample sites. The project will lead to the creation of an effective subsistence shellfish management plans that provide accurate advisory notices to the community members regarding high levels of PSP toxins, thus reducing the number of illnesses or deaths caused by consuming toxic shellfish.

- Project Title: **Development of a Marine Biotoxin Lab in Sitka Alaska**
- Award Amount: **$565,863**
- Project Period: **Sept 2014 – Sept 2016**

Note: There will be several new or revised definitions in the FOAs this year. So pay careful attention to definitions when reading the 2016 FOA.

Projects, Applications, and Grants

A project is not the same thing as a grant. A project consists of a **goal statement, objectives**, and **activities** created through a **community-based planning process** to address a **problem** that is preventing the community from achieving its **long-range goals**. A grant is the agreement between the grantee and the funding organization to fund the project. In other words, the project is the idea and the grant is the funding which helps make that idea a reality. Think about this while you are writing your application – your application is what you are writing to convince the funding organization to invest in your project.

In order to write a strong application, you need a compelling story. The first step in writing the application is refining your story. Your story is your explanation of your project and in one sentence you should be able to convey your project idea. Some examples from the ANA website are below:

ANA Funded Projects

- *Stimulating creativity and complex problem solving skills, as well as increasing student self-esteem and academic outcomes, by delivering quality language immersion for a Dakota/Ojibwe urban language nest. – Alliance of Early Childhood Professionals, Minnesota, Native Language project.*
- *Developing a scientifically defensible conceptual model of the hydrology of the upper Umatilla River Basin groundwater-flow system to ensure development does not harm water flows and existing uses. –Confederated Tribes of the Umatilla Indian Reservation, Oregon, Environmental Regulatory Enhancement project.*
- *Developing integrated agricultural and culinary programs to encourage healthy, sustainable lifestyles for Native Hawaiian students and their families. – Ho'oulu Lahui, Inc, Hawaii. SEDS project.*
- *Increasing processing and sales of locally caught salmon in order to expand tribal members' participation in the salmon industry as fishermen, processors, and marketers. – Sun'aq Tribe of Kodiak, Alaska SEDS project.*

ACTIVITY 1 ❖ DESCRIBE YOUR PROJECT IN ONE SENTENCE

Using the examples in the previous section as a model, describe your project in one sentence.

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Working with the FOA

The Administration for Native Americans issues Funding Opportunity Announcements (FOAs) of available grant funds which can be found at http://www.grants.gov. A separate and distinct announcement is issued for each program area. The FOA is the official document that details the requirements for submission of an application to ANA, including: a description of the format for applications to be submitted, eligibility criteria, information on the content required, and the evaluation criteria. The FOAs provide detailed information for each program area, so it is important that you read the entire FOA in order to ensure that you comply with and address all requirements

ACTIVITY 2 ❖ FAMILIARIZE YOURSELF WITH THE FOA

Directions: Review the Funding Opportunity Announcement, find the following information, and answer each question.

QUESTION	ANSWER/PAGE NUMBER
1. The Funding Opportunity Number is:	
2. What is the Catalog of Federal Domestic Assistance (CFDA) number?	
3. Where can you find the Program Areas of Interest?	
4. How many consecutive awards can you have within one CFDA number?	
5. What is the “Length of Project Periods”?	
6. What are the ceiling and floor dollar amounts?	
7. How much match is required?	
8. Where can you find the Application Disqualification Factors?	
9. Can a paper application be submitted?	
10. Where do you find information on the file formats supported by ACF?	
11. Where does the Project Description start?	

QUESTION	ANSWER/PAGE NUMBER
12. Where do you find the directions on creating a Project Abstract?	
13. What is the maximum number of objectives an application can have?	
14. Where do you find information on impact indicator(s) and how to format them?	
15. On what page do you find the required information to be provided on Organizational Capacity?	
16. On what page do you find information on the costs of required ANA travel?	
17. Where can you find the Submission Dates and Times?	
18. On what page do you find the evaluation criteria for Outcomes Expected?	
19. What is the maximum point value for the Objective Work Plan (OWP)?	
20. Where do you find information on the ANA Internal Review of Proposed Projects?	
21. On what page do you find ANA's reporting requirements?	
22. Will an application be reviewed if the total amount requested for the budget period or the project period is more than the ceiling amount for the category?	

Application Review Criterion

As you plan and prepare to submit an ANA application, knowing exactly how the application will be reviewed will help you in developing, writing, and finalizing the application. The evaluation criteria should guide your project development and the application process. It is important to remember that ANA provides key components for each criterion, lists issues to address under each criterion, and assigns maximum point values for each criterion.

The five scoring criteria are:

1. **Need for Assistance**
2. **Outcomes Expected**
3. **Approach**
4. **Objective Work Plan**
5. **Budget and Budget Justification**

All programs areas use the same five scoring criteria however, the sub-criterion can differ between them.

Criterion One–Need for Assistance Maximum Points: 10

This criterion will evaluate the “framework” of your grant application. The remainder of the application relates to your organization’s ability to address the measurable, negative condition that you have identified in this section and the strategy that will be used to reduce or eliminate that challenge/negative condition.

The following sub-criterion from the ANA FOA will be used to evaluate the information provided in the Need for Assistance section:

- ***a. A clear and focused description that identifies the current and specific condition(s) and directly relates to the objectives to be addressed by the project***
- ***b. Supporting information or data detailing the scope and nature of the problem***
- ***c. Current challenges standing in the way of addressing the problem***
- ***d. A clear description of the community to be served and identifies the intended beneficiaries***

Use the sub-criterion to organize the Needs for Assistance section of your application.

1. A Clear and Focused Description that Identifies the Current and Specific Condition(s) and Directly Relates to the Objectives to be Addressed by the Project

The current and specific condition(s) being addressed here should be stated in one or two concise sentences. The specific condition is often referred to as “the problem”.

The problem is a measurable negative condition that is preventing the community from achieving one or more of its long-range goals. Try to describe the problem in one statement. This problem statement should be compelling and urgent. Be sure to present the problem as a negative condition in the community that would have to be overcome in order to achieve a social, economic, environmental, or governance long-range community goal. While there are probably many problems you can identify that are causing challenges in your community, your application problem statement should identify one specific condition that will be addressed by your project.

Your application should include a discussion of the problem statement in your narrative that address three points. First, define, in measurable terms, the problem that the project will address. Second, describe how the community identified the problem. Third, describe how the problem stands between the community and achievement of a community long-range goal.

Project narratives often describe the problem as a ‘lack of’ or a ‘need for’ something. For example, applications often will assert, “We need a community center with a congregate meal site for elders,” or “Tribal elders currently lack access to a community center and congregate meals.” These statements do not describe a problem, rather they describe a possible solution to a problem.

The actual problems might be a high number of elders showing signs of malnutrition or elders reporting feelings of loneliness and isolation. Those problem statements, developed through a community-based planning process, provide a more genuine description of difficulties impacting a defined segment of the community.

An example of a good problem statement is:

The unemployment rate of the 75 single parents in our community is 75% and has been at or above that rate for over two years because their job skills and experience do not match current job opportunities available within or near our community.

To help clearly explain the relationship between key project elements, we will use this problem statement as the basis of our examples going forward.

***Hint*:** Make sure the problem statement:

A. describes ONE current condition that exists in the community

B. does not describe a solution to the problem

C. is no longer than two sentences.

D. the condition described is presented in URGENT, COMPELLING, AND UNDERSTANDABLE terms

ACTIVITY 3 ❖ WRITE YOUR PROBLEM STATEMENT

Write a problem statement below for your project.

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2. Supporting Information or Data Detailing the Scope and Nature of the Problem

Include data to corroborate the problem/issue you have identified. Sources could be from local data, studies, regional census data and historical data to reinforce community definitions of the problem to be addressed. Use recent data that has been collected within the past 3-5 years. Do not substitute dated or national and statewide secondary data information as the basis of information in your problem statement because this data is too broad and general for this purpose.

Supporting information or data detailing the scope and nature of the problem provides the reviewers with details related to the breadth of the problem in your community. This is extremely important as ANA is looking for projects that are community driven and will lead to a stated community long-range goal.

Below is an example of supporting information and data for the problem statement used in this training.

Tribal Temporary Assistance for Needy Families (TANF) staff have documented that over two-thirds of the single parent families in our community are receiving TANF, are unemployed and have incomes at or below the Federal poverty standard. Our Employment and Training Department staff have conducted a job availability inventory that documents employment opportunities in and near our community. That inventory indicates that there are a number of available employment opportunities that single parent heads of households could access if they had the knowledge, skills and experience required for those positions. Data from our Tribal Employment Rights Office staff corroborates information on job availability and also indicates that many of our community applicants for those jobs are unqualified for available positions. Nearly 40% of the candidates that Employment and Training and Tribal Employment Rights Office staff refer to potential employers are single parents. The reason they are unsuccessful in their applications is because they do not meet minimum qualifications. Our ability to assist this population access employment opportunities is limited by the structures of our employment and training operations. Our work experience, on-the-job-training and classroom activities currently are not designed to assist participants who require child care, transportation, support group and other assistance associated with the special needs of unemployed single parents.

ACTIVITY 4 ❖ SUPPORTING THE SCOPE AND NATURE OF THE PROBLEM

Use the space below to write about the supporting information and data for YOUR project's problem statement.

3. Current Challenges Standing in the Way of Addressing the Problem

Describe what barriers have made it difficult to resolve the problem identified in the problem statement. Do not center your discussion on lacking having funds needed to solve the problem. Examples of barriers can include:

- Geographic isolation
- Organizational capacity limitations
- Unskilled workforce
- Limited language use / knowledge
- Infrastructure limitations
- Community indifference / resistance
- Inter-generational gaps in knowledge

Show how those barriers have made it difficult to address the negative problem/condition on which this project will focus. It is important to include current data in the description of the challenges.

4. A Clear Description of the Community to Be Served and Identifies the Intended Beneficiaries

The discussion of "the community" begins with a brief geographic and demographic description of your overall community. However, the discussion of community in a project narrative moves past a description of your entire community and its history to a more focused description of community members who will be served by the project. These individuals or groups are the targeted beneficiaries for this particular project. Include information on:

- People to be served by the project
- Demographic data that describes social, economic, and other relevant population conditions
- Geographic location.

ACTIVITY 5 ❖ DESCRIBE YOUR COMMUNITY

1. Provide a brief description of your tribe, village, or target demographic (a paragraph or less).

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2. Who are the project's intended beneficiaries? Describe them in some detail.

3. How were the members of the community, including the beneficiaries, involved in defining the problem to be addressed?

4. What additional information do you need to include to better answer these questions?

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Remember that the problem is a negative condition that stands between the community and the realization of a community long-range goal. Your project goal describes the improved condition that will exist at project completion, a condition that moves the community closer to long range goal achievement. These two components relate to the resolution of the problem statement and working toward a future change for the community or organization.

Long-Range Goal and Project Goal

The long-range goal is a statement which describes an ideal state for the community or organization. These long-range goal statements can be found in such places as strategic or community planning documents, on websites, and in organizational mission and vision documents.

The project goal statement represents the new condition that will be in place as a result of the project's successful completion. The project goal statement can describe a reduction or resolution of the specific condition/problem you identified earlier, or an increased capacity to resolve the condition.

In your narrative, it is important to show how the Long-Range Community Goal, Problem Statement and Project Goal are interrelated, as in the example below:

Long-Range Community Goal: All employable community members ages 25-50 will be able to access living wage permanent jobs.

Problem Statement: The unemployment rate of the 75 adult single parents in our community is 75%, and has been at or above that rate for over two years because their job skills and experience do not match current job requirements.

Project Goal: Decrease the unemployment rate of single parents in our community.

The correlation/connection between each of these components listed above must be clearly evident to the reviewers when writing your application. Ensure that each component is specifically addressed in the application in a manner that clearly demonstrates the logical connections between your community long-range goal, project goal, problem statement, and objectives.

ACTIVITY 6 ❖ WRITE YOUR LONG-RANGE AND PROJECT GOAL

1. Write your Long-Range Community Goal:

2. Copy your Problem Statement from Activity 3.

3. Write your Project Goal:

ACTIVITY 7 ❖ MOCK PANEL REVIEW

We indicated earlier that it's important to understand the application review process and address that process while preparing your applications. Now that you're familiar with the requirements of Criterion 1, participating in a mock panel review process will help you gain a clearer understanding of the evaluation criteria and the review process.

ANA applications are scored by non-federal reviewers in a panel review process. This activity allows you to conduct a mock panel review by reading, noting issues and scoring the Need for Assistance section of an application narrative. Please review the narrative in **Appendix A of the Manual** and note issues and provide a score based on the following.

Maximum Points: 10

To evaluate the Need for Assistance, reviewers will consider the extent to which the application includes:

1. A clear and focused description that identifies the current and specific condition(s) and directly relates to the objectives to be addressed by the project.

2. Supporting information or data detailing the scope and nature of the problem.

3. Current challenges standing in the way of addressing the problem.

4. A clear description of the community to be served and identifies the intended beneficiaries.

5. What score, out of 10, did you give the application narrative? _______

6. Was it easy to assess the criterion? Why or Why not?

7. Were you provided sufficient information to score this section of the application?

8. What additional information do you wish was included?

Criterion Two–Outcomes Expected Maximum Points: 25

The following sub-criterion from the ANA FOA will be used to evaluate the information provided in the Outcomes Expected section:

1. ***Application objectives are Specific, Measurable, Achievable, Relevant, and Time-bound (S.M.A.R.T.)***
2. ***The projects intended impact must address how:***
    a. ***The condition(s) identified in the problem statement will be addressed***
    b. ***The lives of community members and beneficiaries will improve***
    c. ***The intended impact is feasible given the project's objectives***

3. The Impact Indicator(s) must describe:

a. How impact will be measured with at least one impact indicator using the same measure at three points in time; baseline (beginning of project), end of project, and 3 years post-project initial project activity
b. Baseline information that was determined through accurate or verifiable methods (for example, surveys, census data, etc.), OR if baseline data are not identified, the extent to which the applicant describes a relevant baseline measure that will be established as an initial project activity
c. An end of project target and a 3 year post-project target that are realistic and adequately measure a change in the condition identified in the problem statement
d. How data will be effectively collected and tracked

1. Application Objectives Are Specific, Measurable, Achievable, Relevant, And Time-Bound (S.M.A.R.T.)

The first sub-criteria for Outcomes Expected is your presentation of S.M.A.R.T. objectives. It is important to keep in mind that ANA requires outcome-oriented objectives. Although objectives are also mentioned in other sections of the project description (the Approach and OWP) reviewers will evaluate them under this criterion.

S.M.A.R.T. Objectives are:

- **Specific** – in identifying the outcomes that will be achieved
- **Measurable** – using quantifiable or objective terms in describing how progress and completion will be measured
- **Achievable** – given the proposed time frame, approach, and resources
- **Relevant** – to the problem statement, project goal, and the long term goals of the community to be served
- **Time-bound** – with an end date reflecting completion within the project period

S.M.A.R.T objectives describe outcomes. Outcomes are measurable, beneficial changes that reduce or eliminate a problem that prevents the community from reaching a long-range goal. It is also important to note the ANA FOA limits you to 3 objectives for the entire project period. The following example of an objective is built on the S.M.A.R.T framework and addresses the sample problem statement used in the Criterion One discussion:

Expand our Job Center to assist 80% of the unemployed single parents (45) in our community with job skills training using the DOL program materials with cultural modifications and place 30 participants by the end of 36 months.

To get a better understanding of the S.M.A.R.T objective format, here is how each portion of the acronym is included in the sample objective:

- **Specific**–45 single parents receiving job skills training using culturally modified DOL program materials will be employed: a beneficial change in the community (an outcome) and a reduction in a negative community condition.
- **Measurable**–45 single parents trained and 30 employed describes a measurable number of individuals that will benefit from the project.
- **Achievable**–Show in the project approach that it is feasible to train 45 single parents and find employment for 30 in 3 years. Your narrative will explain how this can be achieved. Do not be overly ambitious in your projections.
- **Relevant**–The objective is relative to and will help resolve the problem statement. It is relevant to the community's long-range employment goal: **---** *All employable community members ages 25-50 will be able to access living wage permanent jobs.*
- **Time-bound** – "by the end of 36 months" clearly states the time frame this objective will be completed.

ACTIVITY 8 ❖ WRITE THREE PROJECT OBJECTIVES

1. Based on your problem statement, write up to three objectives that explain how this project will help eliminate or alleviate the measurable negative community condition (problem) that is the project focus. After you've written each objective, determine if it meets S.M.A.R.T. criteria.

Objective 1:

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Answer the question below about Objective 1

Is the objective above:		Yes	No			Yes	No
1.	Specific?			4.	Relevant?		
2.	Measurable?			5.	Time-Bound?		
3.	Achievable?			.			

Objective 2:

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Answer the question below about Objective 2

Is the objective above:		Yes	No			Yes	No
1.	Specific?			4.	Relevant?		
2.	Measurable?			5.	Time-Bound?		
3.	Achievable?			.			

Objective 3:

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Answer the question below about Objective 3

Is the objective above:	Yes	No		Yes	No
1. Specific?			4. Relevant?		
2. Measurable?			5. Time-Bound?		
3. Achievable?			.		

In addition to stating and explaining your SMART Objectives, the FOA criterion require you to present the **Results and Benefits** that are anticipated to occur when the objective has been accomplished. Additionally, you will present the **Criteria for Evaluating** and tools used to measure the results and benefits. These terms are defined further in the OWP criterion section. However, you will expand on the brief information found in the OWP in this section of the narrative so the reviewer has a clear understanding.

2. The Project's Intended Impact

The second sub-criterion for Outcomes Expected is addressing the intended impacts of your project. Intended impacts describe what measurable positive change will occur because of the project.

In the example that we are using, unemployment is caused by community members not having the skills and knowledge needed to access existing, available jobs. The project focuses on culturally modifying program materials to help community members acquire those job skills. Training single parents during this project will prepare them for work and decrease the community's unemployment rate. A three year time frame to modify materials and train community members appears to be feasible.

3. The Impact Indicator(s)

The third sub-criterion for Outcomes Expected is the presentation of your project's impact indicators. Impacts indicators are long-term outcomes created by the project that occur after the project period ends. Those planned long term outcomes/impacts continue progress in achieving long-range community goals. "Continued, measurable reduction of community unemployment" describes an impact indicator. In presenting that indicator, a projected level of reduced unemployment must be included (a decrease to 12% in the example below).

ANA requires all applicants and grantees to identify impact indicators utilizing three data points they will track and work towards achieving during and after the ANA funded project period. The required data points are defined as:

Pre-grant status: This is the baseline measure at the start of project implementation, and often matches the problem statement provided in the “Need for Assistance” section.

End-of-grant target: The end-of-grant target is the anticipated data point at the end of the project period. This target represents the extent to which the applicant expects to measure a change in the problem condition by the end of the ANA grant.

3-year target: The 3-year target is the anticipated data point for 3 years after the grant funding has ended. This target is a projection of the intended growth or sustainability of the desired impact/change.

Note: There will be a slight change in the chart ANA uses to summarize the project impact indicator for Native Language projects only. The final column “Means of Measurement” will be “Means of Measurement/Assessment”. Please see the FOA for details.

Below is an example of how to display impact indicator information in your application. Again, we are using our sample community long-range goal, problem statement, project goal and objectives:

Impact Indicator	Pre-Grant Status (Baseline)	End of Grant Status	3 Years after End of Grant	Means of Measurement
Decrease in the Tribe’s Single Parent Unemployment Rate	75% (56 people unemployed)	35% (26 people unemployed)	12% (9 people unemployed)	Number of single parents with jobs as documented by participant interviews surveys and other follow-up contacts

Pre-grant status: The community has a single parent unemployment rate of 75%.

End-of-grant target: The community projects to decrease the single parent unemployment rate by 40 percentage points over the life of the project. The end of grant target would be 35% as a result of the project.

3 Year after End of Grant: The community projects an additional 5 or 6 people/year gaining employment, resulting in the decrease in the single parent unemployment rate down to 12%.

Means of measurement: Additionally, the means of measurement must be identified, i.e., *how* the measurement(s) will be made to show that stated impact status has been achieved. For example, if the purpose of a project is to address unemployment within a tribe or Native community by providing job training and certification to community members, the project outputs would include the number of community members that obtain job training, receive certifications. The impact indicator would be the number of community members placed within jobs because of the training and certification received.

Hint: Impact Indicator requirements differ between program areas. Please see Section IV.1 of the FOA for specific Impact Indicator and Outcome requirements. For example, Native Language and SEEDS FOA have required Impact Indicators to be addressed by applicants, while for the SEDS and ERE FOAs, applicants develop impact indicator(s) based on their individual projects.

ACTIVITY 9 ❖ WRITE YOUR EXPECTED IMPACT AND IMPACT INDICATOR(S)

1. What long-term change do you expect to see in your community because of sustained project benefits? What are the impacts you expect to happen? List everything that comes to mind.

2. Using the list from above, create three impact indicators to **measure the sustained success of your project and display them in the table below.**

IMPACT INDICATOR	PRE-GRANT STATUS	END-OF-GRANT TARGET	3-YEAR TARGET

3. How are you going to document that you met your target? What kind of records/data do you need to keep? Also describe how the data used for your impact indicators will be effectively collected and tracked.

Criterion Three–Approach Maximum Points: 35

The Approach section provides information on how you will implement the key activities of your project. It is important to provide a concise narrative which presents enough information that anyone can clearly understand how the project will successfully be implemented from beginning to end consistent with the work plan. The narrative will present the organization’s capacity to handle funding, implement the project now and into the future. Lastly, the narrative will explain how the community was and will be involved in project development and implementation.

In scoring the Approach section, reviewers will consider the three major sub-criterion: planning and implementation, community involvement, and organizational capacity and staffing plan. Each of these components has several subheadings.

1. ***A Planning and Implementation description that includes:***

    a. ***A comprehensive implementation plan for the full project period, including a detailed description of all key activities***
    b. ***An explanation of how specific tasks and activities will be completed (for example, how project participants will be selected, how surveys will be conducted, etc.)***
    c. ***Contingency plans that describe adequate strategies to address potential obstacles and challenges***
    d. ***Information on the non-federal resources (staff, materials, facilities, etc.) necessary to implement the project and provides sufficient plans describing how any other necessary resources will be leveraged***
    e. ***A description of how partnerships will be developed, maintained, and utilized to support the project***
    f. ***A plan to ensure that project outcomes will be sustained and, if applicable, how programmatic sustainability will be achieved***

2. ***Community Involvement in the planning and implementation of the project that describes:***

    a. ***How community input was used in developing the project, (for example from community meetings, surveys, community members participating in the planning process, etc.)***
    b. ***The plan to maintain community support and/or participation during project implementation, including how participants will be recruited if applicable***

c. ***Specific outreach activities or other methods for building community awareness of the project and keeping community members informed of progress and outcomes***

3. ***An Organizational Capacity and Staffing Plan that provides:***

   a. ***Demonstrates the necessary capacity to implement activities and monitor project progress in order to ensure successful completion of objectives***
   b. ***Fully describes a project staffing plan that includes staff responsibilities and project personnel with sufficient qualifications to fulfill those responsibilities (for example, required licensing, professional experience, subject matter expertise, etc.)***
   c. ***Provides a realistic plan for recruitment and hiring (only applicable if new hires are required)***
   d. ***Clearly describes how oversight and management of federal funds will be properly ensured, and identifies who will be responsible for maintaining oversight of program reporting, activities, staff, partners, and finances***
   e. ***Demonstrates that proposed partners or consultants have the expertise necessary to perform assigned project tasks***

In this section, discuss such issues as why the objectives included in the application provide the most promising alternative for successfully addressing the problem that the community wants eliminated and reaching the project goal. Create a narrative that describes the interaction and sequencing of activities and shows how the activities, when completed, will accomplish project objectives.

Hint: Some writers will start work on the Implementation Plan section of Criterion Three by developing the Objective Work Plan (OWP) even though the OWP follows the Approach in the application format. A completed OWP provides them with a good idea of the complexity and scope of the project implementation process. If this is the process that you decide to follow, your OWP becomes a guideline to begin your Project Approach narrative.

Hint: It is ***VERY*** important that the Long-Range and Project Goal Statements, Problem Statement, each Objective, all Results and Benefits in the Approach and the OWP are **<u>identical</u>**.

Note: There will be a new evaluation element for language applicants only, regarding the current status of the language. Language applicants typically provide the following information when discussing the status of the language:

A. Identify the target Native American Language and its current status.

B. Provide a description of any existing language program and language resources in the community to be served.

Native Language applications should include the current status of the language in this section to support their problem statement. Status of the language narrative includes identification of the Native language, current data such as a language assessment identifying the number of fluent, proficient and novice speakers and description of the current and past language preservation efforts (including resource materials) in the community. This sub-criterion will be further described in the new language FOAs.

Use the sub-criteria to prepare the Approach section of your application.

1. Planning and Implementation Description

The first sub-criterion for the Approach section is the presentation of your Planning and Implementation. Be sure that all elements of this sub-criterion work together to describe a well thought out strategy for reducing the problem standing between the community and a high priority long-range goal and achieving the project goal. For example, tasks described in the second area of this sub-criterion should clearly lead to project implementation. Contingency plans will describe how you will address potential challenges and your description of your organizational capacity and the capacity of your partners will document your ability to successfully complete the project.

a. Comprehensive Implementation Plan

This overview and introduction of the project includes a presentation of the key activities that will successfully accomplish project objectives and the project goal. Your project approach is a companion to the OWP and helps the reviewer to better understand the project's design. Provide a narrative that describes the scope of the project and the logic of the project implementation process. Do not just reiterate the activities that are listed in the OWP.

b. Details of Task Completion

For critical or complex tasks listed in the Project Approach, provide detailed information on how these tasks will be carried out to provide the reader with a clear understanding of the feasibility for reaching project objectives.

For example, if conducting participant recruitment as an activity, provide a description of the following:

- Outreach techniques for recruitment - i.e.: newsletter, radio, websites, partner organizations, listservs, social media, community events
- How participants will be selected - i.e.: written exam, application interview, proficiency test.

ACTIVITY 10 ❖ EXPLAIN YOUR PROJECT STRATEGY

1. Describe the planning process used for project design.

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2. Why will this project strategy work?

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3. What are the main tasks that will be used in project implementation?

4. How will progress in carrying out project activities be monitored?

c. *Contingency Planning*

Good project planning includes a discussion of potential project challenges and how they would be resolved if encountered. Unplanned events often test the initial implementation of key activities within the project and create challenges that could impact your ability to accomplish the project on time and within budget. A well-planned project is one in which the organization has tried to anticipate and address potential challenges. These challenges are generally outside of the control of project management and are not every day standard business practices of the organization.

For each project challenge that has a significant risk of delaying or stopping project progress, you should develop an alternate, or go-to plan, that will minimize project disruption. These alternatives make up the project contingency plan. Identification of potential challenges and development of a contingency plan should be done by those closely working on the project's development.

Look through your project's key activities and find those activities that would create a risk to keeping the project on time and successful if a delay occurred. A few examples are included below and a list of the most frequent challenges experienced by grantees can be found in Appendix B.

1. **Activity**: Key personnel will be hired within two months.

Challenge: An individual with all qualifications for a key position was identified in the application but has since declined the position.

Contingency Plan: Identify a current staff member with qualifications that will keep the project going until the position is filled.

2. **Activity**: In year one recruit 19 unemployed single parents for job skill training by the 4^{th} month.

Challenge: The total number of participants expected is less than 19, for example only 10 single parents apply

Contingency Plan: Enhance recruitment methods for years two and three to ensure getting the initial 19 participants projected and a total of 9 more over the next two years to meet project targets.

ACTIVITY 11 ❖ DEVELOP YOUR CONTINGENCY PLAN

1. What possible challenges could impact your proposed project? How would you resolve them?

   Write your assumptions, anticipated challenges and the proposed solutions below.

Assumption 1:

Challenge:

Contingency:

Assumption 2:

Challenge:

Contingency:

Assumption 3:

Challenge:

Contingency:

d. Non-Federal Share and Leveraged Resources

Non-federal and leveraged resources are essential components of project operation. The non-federal share (NFS) is the grantee's resources used to support the project and can include cash, donated goods, or donated services. ANA requires applicants to commit 20% of the Total Project Costs for each year of the project (more information provided in the Budget section). These resources cannot include other federal funds unless the legislation authorizing the funds specifically state that they can be used as NFS for other federal awards. In this section, you will identify each of your resources that will be used for NFS. Describe the rationale used to assign a dollar value to the service or goods that will be used as in-kind NFS. Provide a description of the documentation you will collect and maintain to verify receipt and use of NFS.

Leveraged resources are any resource acquired or used during the course of the project period that supports the project (these are resources in addition to the federal share, non-federal share, and program income). <u>Leveraged resources are not included in the project line item budget or budget justification.</u>

Leveraged resources can come from both federal and non-federal sources. They can include such items as materials, services, equipment, land, supplies, personnel, facility use, and cash. Keep in mind that a firm, long-term commitment of leveraged funds can be a very effective strategy on which to build a project sustainability plan.

Hint: If activities are going to be implemented using funds from other sources and not in either your federal or non-federal share you should explain that in the project narrative. Your score could be impacted if it appears that you have not planned for all costs to successfully implement your project.

e. Partners

Partners are individuals or organizations that are invested in the success of your project. Partnerships can play a huge part in your tribe or organization's ability to implement a project. When discussing partnerships, list current partners that will be assisting you in the implementation of your project. Include information on the current organizational relationship between your organization and your partner's organization, along with how the relationship will be maintained during the project. Present the experience and expertise of these partners and how it aligns with the activities they will be supporting; include the value of the goods or services provided by the partner.

Additionally, partnerships can provide a potential method for sustainability in continuing the project's impacts in your community after funding has ended.

Using our example of assisting unemployed single parents, the following partnership summary has been developed.

A partnership with the local workforce recruitment office is formed and their staff will provide training and access to the agency's employment database during the length of the project. Teaching project participants how to use and access this resource will increase their ability to find jobs during and after the ANA project. This training can also be provided to other community members during times of their unemployment.

ACTIVITY 12 ❖ IDENTIFY PARTNERS

List partners that will help with project implementation	How will this partnership be developed?	How will this partnership help support the project?	How will this partnership be maintained?

ACTIVITY 13 ❖ IDENTIFY THE RESOURCES YOU WILL LEVERAGE

For each partner listed above or any potential goods/services, provide a dollar amount to calculate the monetary value of the resources you are leveraging for the project.

Partner/Goods and Services	Anticipated Value

f. Sustainability

ANA requires that a project's outcomes be sustainable when the ANA funding ends. However, sustainability is not simply about generating new grant dollars– it involves outlining a specific strategy for continuing your project impact. ANA emphasizes the importance of project sustainability because it maintains the benefits for the community past the life of the project. <u>Sustainability does not require that you sustain your project at the level you did during the ANA funding.</u>

ANA and other funders, usually look for such strategies in a sustainability plan as:

- Continued benefits for individuals/ the community, after initial program funding ends, through capacities built during the project period; or
- Continuation of program activities within an organization, often termed "institutionalization" or "routinization", or;
- Continued capacity of a community/organization to continue program activities and benefits through leveraged resources; or
- Revenues generated by the project.

Explain how the project impacts will be sustained within the community after your ANA project funding ends. This can be through the continuation of activities in the form of a program, the continued use of a product(s) developed, or a combination of both.

Hint: A few examples of ways to continue programmatic activities are through the procurement of additional funding sources, continuation of some or all project activities within the organization or through a partner organization.

Hint: A few examples of continuing product benefits could be to use a revised constitution, a completed language assessment, or tribal environmental codes and regulations.

When developing your sustainability plan, consider these elements: How will you ensure there is continued political and community support for your project? How will you ensure the necessary programmatic elements of the project are sustained? How will you pay for the sustainability of the project?

ACTIVITY 14 ❖ DEVELOP A SUSTAINABILITY PLAN

1. Will your sustainability plan focus on long-term continuation of project operation OR does it center on sustained project outcomes? Describe the focus of the sustainability strategy that you will develop for the project.

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2. How do you plan to involve the community in building sustainability strategies for the project?

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3. How do you plan to get political support for sustaining the project or elements of the project's operation? Are there other groups to partner with in building political and community support for sustaining the project or project components?

4. Describe any plans for continued financial support. Will you be contacting other funding sources for further support and what are the sources? Will those funds be grant, contract or fee for service?

5. Using your responses to previous questions, describe your sustainability plan below.

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2. Community Involvement

The second sub-criterion for the Approach section is the presentation of community involvement.

a. Community Input in the Develop of the Project

ANA data indicates that community involvement is a key factor in the overall success of a project by promoting buy-in from members. This is especially important if community participation is essential to completing the project's objectives. Community participation in project development includes involvement in defining the problem the project will reduce or eliminate and developing the approach for reducing or eliminating the problem. Include a description of how the community assisted in project planning and how community members will also play a significant role in the overall implementation of the project. Provide details on the community-based planning process utilized to develop this project.

Document community involvement in project development by including relevant sections in the appendix section of the application. Documentation could include information on:

- Focus groups and interviews with key informants;
- Community meeting minutes along with sign-in sheets;
- Tribal council or board meeting minutes and/or sign-in sheets; and
- Summary of results from surveys or community assessments.

ACTIVITY 15 ❖ DESCRIBE COMMUNITY PARTICIPATION IN PROJECT DEVELOPMENT

1. List ways you have involved or will involve the community in the development of your project.

2. How would you document your community involvement?

3. How well did you answer these questions? What additional information do you need to include to better answer these questions?

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b. Maintain Community Support

Community involvement is an essential component of both the initial project planning process and the project implementation process. Describe the plan to build and keep the community informed. Describe how the community intends to participate in project implementation and what process you will utilize to encourage and maximize community involvement during project implementation. Make sure to include these activities on your OWPs.

ACTIVITY 16 ❖ ENGAGE THE COMMUNITY IN IMPLEMENTATION

1. Think about how you will include community members in your project.

What methods will you use to get the word out?

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List some ways you will get community members to participate in your project.

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c. Community Outreach Plans

Effective outreach strategies are an essential tool for engaging the community in planning and implementation activities. Describe your outreach strategy in the narrative and include activities in the OWP. Listed below are some strategies that might be helpful in developing outreach approaches.

- Create colorful and interesting flyers and post them throughout your community (post office, tribal offices, stores, schools, clinics, laundromats, churches, etc.). The flyer should briefly and clearly state the purpose of the meeting and why it is important to attend. Indicate the times the meeting starts and ends.

- Ask all local media (radio, television, and newspapers) to run free notices or public service announcements.
- Post your meeting on any public calendars maintained in your community.
- Elicit the help of community organizations to notify their members.
- Issue personal invitations to community leaders, elders, and any individuals you anticipate might be considered functional leaders of your community.
- Use social media (i.e., Facebook, Twitter, or LinkedIn) if the audience you are trying to reach uses social media.
- Get onto the agenda of meetings already scheduled by other entities (General Council, Elder Council, JOM Committee, Head Start Board) to discuss community problems and possible projects.

3. Organizational Capacity and Staffing Plan

The third sub-criterion in the Approach section is Organizational Capacity and Staffing which focuses on documenting your program and fiscal management capabilities, staffing plans and qualifications of partners and consultants.

a. Project Implementation and Monitoring Capacity

Describe your organization's current capacity to implement activities and monitor project progress. Give a brief summary of recent projects with similar scope and complexity to the one you are proposing that your organization has successfully completed. Describe the management and oversight structure that will be in place for this project to ensure that successful project completion occurs. Include an organizational chart in the attachments that displays the structure of the entire organization and shows where the project fits into the structure. Your analysis of current organizational capacity will indicate whether or not your organization will need additional staffing assistance to implement and monitor the project.

b. Staffing Plan

Provide an overview of the proposed staffing for the project. Summarize staff position descriptions in the narrative and include full position descriptions in the attachments. It is important to remember when developing job descriptions that you list the qualifications necessary to effectively do the job that is required, such as any special certifications, higher education degrees, and licensing. Include information on all key staff that will work on the project, not just staff that will be funded by ANA. Brief biographies and/or resumes of individuals already identified as staff for key project positions will be included as an attachment.

Hint: Project positions discussed in this section must match the positions identified in the OWP and the itemized budget.

Consider including a full-time project manager to administer projects with any degree of complexity. This position would be expected to have skills, knowledge, and experience related to the responsibilities associated with maintaining oversight of program reporting, activities, project staff and partners. Additionally, the project manager should have an understanding of fiscal management components and the necessary skills to coordinate with the key fiscal staff.

c. Recruitment and Hiring

For recruitment, describe how your process will ensure community members are aware of the opportunity for employment. Describe your use of tribal and local media in recruitment and hiring activities. ANA encourages use of Native and tribal preference in recruitment and hiring practices.

Describe the hiring process used by your organization and the proposed timeline for filling the position(s). Time frames for recruiting and hiring key positions often are underestimated in the project approach presentations, resulting in the delay of the project's implementation.

d. Oversight and Management of Federal Funds

Describe how the project manager and project fiscal staff will coordinate to maintain programmatic and financial records. Describe how they will collaborate in preparing biannual Objective Progress Reports and SF 425 fiscal reports for ANA. Document your history of successful financial management activities. Attach documents such as an auditor's letter, indicating that your organization's fiscal records are maintained in accordance with the Generally Accepted Accounting Practices standards, as part of that documentation.

e. Partner and Consultant Qualifications

Include statements of qualifications for proposed partners or consultants which documents their expertise to perform their assigned project tasks. Ensure information from potential consultants and partners clearly indicated they understand and commit to the responsibilities outlined for them in the planning and implementation sections of the application as well as the OWP. If consultants are to be selected through a competitive process, include information on qualifications that will be expected in the successful candidate. ANA encourages use of Native and tribal preference in these selection processes.

ACTIVITY 17 ❖ DESCRIBE YOUR ORGANIZATION'S CAPACITY AND STAFFING PLAN

Explain in detail your organization's program management and fiscal management capacity to implement this project.

1. Program Management

2. Financial Management

3. Use the following chart to develop your Staffing Plan:

Position	Qualifications Required	Responsibilities

4. Describe how the project coordinator and position designated for fiscal management will coordinate to maintain programmatic and financial records and collaborate in preparing quarterly reports.

5. Use the chart below to describe qualifications and responsibilities required for proposed partners or consultants.

Partner/Consultant	Qualifications Required	Responsibilities

Criterion Four–Objective Work Plan (OWP) Maximum Points: 20

The OWP is a required OMB-approved form that outlines the logical connections between the different project elements.

In scoring the Objective Work Plan section, reviewers will consider the 4 major sub-criteria. They must determine how well the applicant:

1. ***Aligns the OWP with the information provided in the project narrative, serving as a stand-alone document to communicate the problem statement, project goal, objectives, activities, results and benefits, and criteria for evaluating results and benefits***
2. ***Includes all key activities needed to implement the project in each project year, indicating start and end dates with sufficient time for completion and detailing how, when, and by whom each activity will be conducted***
3. ***Includes results and benefits that mark milestone achievements in support of accomplishing objectives, and criteria for evaluating results and benefits that explain how these milestones will be measured***
4. ***Demonstrates logical connections between the different project elements so that it is clear how implementing activities will lead to achieving the objectives, and how achieving the objectives will accomplish the project goal and directly address the problem statement***

1. Stand-Alone Document that Aligns with the Project Narrative

Think of the OWP as a blueprint for the project's implementation and execution. It is ANA's format for applicants to use in describing the how (through what activities), the when (within what time frames), and by whom (assignment of responsibility) the project will be implemented.

2. Key Activities

Key Activities provides a brief description of the activity that will take place, for example, the recruitment and hiring of staff, recruiting the number of people participating, sections of curriculum being developed, trainings attended, reviews conducted, testing provided and community meetings held. This brief detail will allow the Project Director and Other Support involved in the project to see what tasks need to be done, when the tasks will occur and the time-frame necessary to complete them.

3. Results and Benefits with Criteria for Evaluating

The Results and Benefits section of the OWP provides information on what project outputs (results) and outcomes (benefits) will be produced by the project. The Criteria section (V.1) presents the standards that will be used to evaluate whether planned outputs and outcomes were achieved. Results and Benefits are derived directly from the objectives and should be consistent with the information found in other project narrative sections: Need for Assistance, Outcomes Expected, and Approach.

ACTIVITY 18 ❖ ANALYZE EXPECTED RESULTS

1. What outputs/results will your project produce? Examples can include: Number of participants completing workshops or training sessions, curriculum developed, instructional videos, etc. List everything that comes to mind.

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2. Looking at your list of results - What can you measure? Can you provide target numbers? List the result and the target number. How will you track the results?

Result	Target Number	Measurement Strategy

3. Analyze Expected Benefits

What measurable, positive change will occur because of your project? What benefits (outcomes) do you expect? Are there going to be benefits to your organization? Are there benefits to the community? Write down everything that comes to mind.

Benefit	Target Number	Measurement Strategy

4. Logical Connections

A well-crafted OWP documents how implementing activities will lead to achieving project objectives, and how achieving the objectives will accomplish the project goal and directly address the problem statement.

Note: There are two travel events that are required to be included in your OWP and budget: ANA Post Award Training (year 1 only) and Grantee Meeting (each year). The Post Award Training usually happens in the first or second quarter of the first year. The Grantee Meeting is usually held in the third quarter of each year.

OWP Form

Items included in an OWP are:

- Project Title
- Project Goal
- The Problem Statement to be addressed by the project
- The Project Objectives
- The Results and Benefits Expected
- The Criteria for Evaluating (results and benefits) (success in achieving them)
- The Activities
  - Positions Responsible for the activity accomplishment - Lead and Other Support
  - Begin and End Dates – note that the mm/dd/year format is used for dates.

A fillable, electronic OWP form is located in the Grants.gov application packet. A Word version of the OWP is available on the ANA website: http://www.acf.hhs.gov/programs/ana/resource/objective-work-plan. Either form is acceptable for your application, however, ANA would prefer you use the electronic form.

Important Information on Completing your OWP:

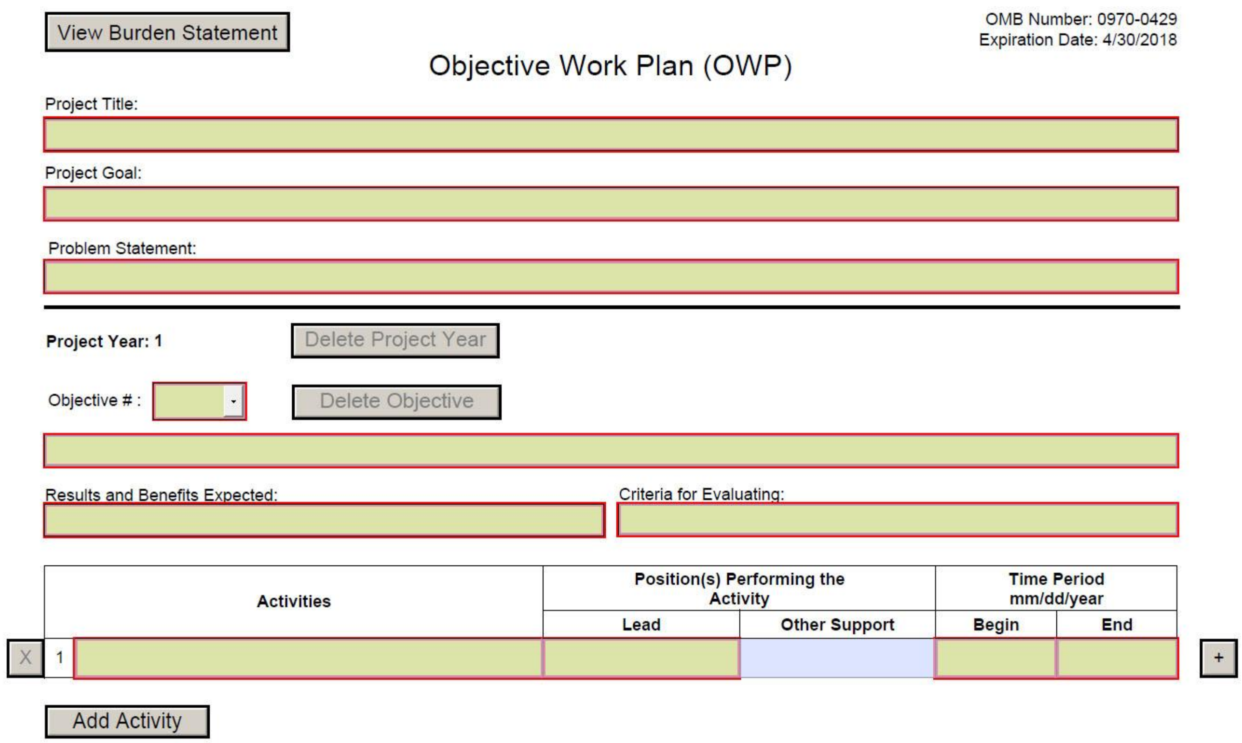
- ANA limits you to 3 Objectives for the entire project period.
- An OWP form is needed for each year of the project and for each objective.
- The OWP form is expandable and objectives with a high number of activities will require more than the one page that is displayed when an electronic OWP form is opened. Add additional lines to the activities section as needed.

Hint: In the Grants.gov OWP form, the gold boxes outlined in red are mandatory fields. These must be filled in or the entire application will be rejected for errors. This will be explained in further detail in the Submitting the Application section. To add activities you will click the “Add Activity” button on the left side of the form. If you miss an activity while filling in the form you can click the “+” button in-between two activities to insert a blank row.

Hint: You need to fill out the SF-424 form out first to get the project title to populate the same field on the OWP form.

Note: It is important to put an activity for completing required reports. The reporting requirements have changed. Applicants should include time to complete an OPR and SF-425 twice a year. In addition to those reports annually grantees are required to submit a data report (new requirement in 2016), a final SF-425 for each budget year, the SF-428 and SF-429. The Division of Payment Management financial report is also due quarterly.

Filling out the OWP Form


View Burden Statement

OMB Number: 0970-0429
Expiration Date: 4/30/2018

Objective Work Plan (OWP)

Project Title:

Project Goal:

Problem Statement:

Project Year: 1 Delete Project Year

Objective # : Delete Objective

Results and Benefits Expected: Criteria for Evaluating:

Activities	Position(s) Performing the Activity		Time Period mm/dd/year	
	Lead	Other Support	Begin	End
1				

Add Activity

PROJECT TITLE: Copy exactly as found in the project narrative.
PROJECT GOAL: Copy exactly as found in the project narrative.
PROBLEM STATEMENT: Copy exactly as found in the project narrative.

OBJECTIVE: We will be using our previous example of a SMART objective: **"***Expand our Job Center to assist 80% of the single parents (45) in our community with job skills training using the DOL program materials with cultural modifications and place 30 participants by the end of 36 months.*" Objectives can span more than 1 year, so although ANA only allows three objectives in a project period, one objective can provide different levels of outcomes in each year of a multi-year project. Be sure to copy the Objective Statement exactly as found in the project narrative.

RESULTS (What is produced?) “Assist 80% of the single parents (45) in our community with job skills training” is a project result from our earlier example of a SMART objective. **Results**, or the outputs, are what are produced because of the project. Other examples of “results” could include the numbers of: workshops, courses, or training sessions held; training manuals or curricula created; or action plans developed or hours of on-the-job training.

BENEFITS (What positive change is achieved in the community?) “Thirty single parents in the community are employed because of the project” is a project benefit from our earlier example of a SMART objective. **Benefits**, or the outcomes, are what is achieved because of the project. Additional examples of **benefits** (outcomes) that could be listed on the OWP include: number of community members who secure living wage jobs after participating in project activities; number of participants who remain employed after a 12 month period and number of participants who start savings accounts because of their employment status and number of participants who are no longer below the poverty line.

ACTIVITIES: Key Activities are specific action steps required to accomplish an objective. The activities associated with each objective are presented in the OWP in a logical chronological sequence and in specified time frames within each budget period. In addition to Lead Positions, you will identify Other Support such as other project staff, consultants, and partners who are essential to the successful completion of specific activities.

The activities provide the details necessary to conduct each activity at the time it will occur and the personnel that will be working on it. For example, if you will hold 10 trainings in a year - list the type of training, personnel and the dates each of the individual trainings will occur.

Hint: Be sure all personnel identified in the budget, both in the Federal Share and the NFS, have activities assigned to them in the OWP. Those activities should also correlate to their budgeted Full Time Equivalent (FTE) - Full or Part time status.

ACTIVITY 19 ❖ OBJECTIVE WORK PLAN

Fill out the following OWP form using the information you’ve developed for your project.

Objective Work Plan (OWP)

Project Title:
Project Goal:
Project Year:

Objective # _:					
Problem Statement:					
Results and Benefits Expected:		**Criteria for Evaluating:**			
	Activities	**Position(s) Performing the Activity**		**Time Period mm/dd/year**	
#		**Lead**	**Other Support**	**Begin**	**End**

Criterion Five - Budget and Budget Justification–Maximum Points: 10

Guidelines for preparing the budget and budget narrative justification are listed below.

1. ***Provide a comprehensive line-item budget for each project year, accounting for all expenditures (federal and non-federal) necessary to implement the project***
2. ***Include a budget justification for each project year, detailing cost basis and calculations to demonstrate how line-item expenditures were derived, with vendor estimates for larger expenditures where applicable***
3. ***Sufficiently explains all costs to be programmatically justified in relation to the proposed activities.***

1. Line-Item Budget

The line-item budget provides detailed line item amounts of federal and non-federal resources that will be needed to carry out the project work plan for each budget period (project year). It documents the reasonableness and relevance of costs of the proposed project. A line item budget is required for each year of your project, for example, a 3-year project would have three individual line-item budgets. The line item budget, project narrative and the OWP must all closely align. Be sure all items in the narrative and OWP with an associated cost are included in your line item budget. Similarly, if you have a cost in the budget, make sure that it has an activity related to that cost in the OWP and it is explained in the project narrative.

ANA requires a 20% applicant match of the Total Costs per budget period (per project year). This is the amount the applicant needs to contribute to the project. These contributed funds will be directly related to implementing the project, for example providing office space or supplies, contributing to travel costs, providing salary for project personnel. The applicant match requirement may be in the form of cash or in-kind contributions and can be provided by the applicant or by third parties.

Note: Be sure to commit only the required 20% NFS that is required.

- Committing more than 20% is not beneficial to your application
- Committing less than 20% can result in point deduction.

See the graphic below for an example of how to calculate the match requirement.

Calculating ANA Non-Federal Share
(20% of the Total Project Cost)

	Step 1	
Federal Request		$ 300,000
÷.80		÷.80
Total Project Cost		$ 375,000
	Step 2	
Total Project Cost		$375,000
Federal Request		$300,000
Non-Federal Share		$ 75,000

	Check NFS with 25% Rule	
Federal Request		$ 300,000
x 25%		x.25
Non-Federal Share		$ 75,000

Your budget should align with the Object Class Categories listed below (which also are on the SF-424A, Section B – Budget Category).

Line Item or Object Class Category	Description
Personnel	Employee salaries and wages. For each staff person identified, provide title, and time commitment (in months or percentage of time). Ensure that you list total hours per month times the number of months worked for each person listed under personnel and list the percentage of FTE (full-time equivalent) each position will require. Indicate what your particular Tribe or Organization definition of FTE is in your application.
Fringe Benefits	Payroll taxes (employer portion) and staff benefits. Break down the amount of each benefit (or percentage of total benefits) or note your negotiated fringe benefit rate.

Line Item or Object Class Category	Description
Travel	Travel for project related activities by staff (note: consultant travel goes under "Other"). Show the number of travelers, destination, duration, per diem, ground transportation, airfare rates, and any other travel allowances for the trip (parking, etc.). This applies for the required ANA Post Award and Grantee trainings as well.
Equipment	Defined as tangible, non-expendable personal property having a useful life of more than one year AND an acquisition cost of $5,000 or more PER UNIT.
Supplies	Items such as personal property excluding equipment and intangible property (copyrights, patents); e.g. office supplies, program supplies, etc.
Contractual	Cost of contracts with consulting firms, third-party contractors and/or secondary recipient organizations, including delegate agencies.
Other	Includes all other costs including utilities, rent, liability and property (not employee) insurance costs, machine rentals and maintenance, consultants, other non-employee travel, local travel, computers and phone.
Indirect	Only allowed if an applicant has a current negotiated federal indirect rate, or are using the de minimis rate. Current is defined as an IDC that covers the period of your grant application or does not expire until after your grant has been funded. The de minimis rate can be used when an organization has ***never*** received a negotiated indirect rate.
Program Income	Includes any revenue that is generated as a result of an activity of an ANA supported project. Such income should be explained as to its appropriate use.

Note: De Minimis rate – if your organization does not have a negotiated indirect cost rate

This is 10% of Modified Total Direct Costs (MTDC) and covers services normally included under an IDC. As described in §200.403 Factors affecting allowability of costs, costs must be consistently charged as either indirect or direct costs, but may not be double charged or inconsistently charged as both. If chosen, this methodology once elected must be used consistently for all Federal awards until such time as a non-Federal entity chooses to negotiate for a rate, which the non-Federal entity may apply to do at any time.

The items that compose the Modified Total Direct Cost MTDC can be found in 2 CFR Part 200.68.

Note: Applicants should use their own travel policies to determine travel costs to the required training and meeting. ANA is not specifying an amount this year.

Note the sample form for a Line Item Budget below.

Line Item Budget for Year ____ (create budget for each year)			
Category	**Federal Share**	**20% Non-Federal Share**	**Total**
Personnel:			
Project Director			
Admin. Asst.			
Personnel 1			
Personnel Total	0.00	0.00	0.00
Fringe Benefits			
FICA			
Unemployment Insurance			
Social Security			
Medicare			
Worker's Comp - varies			

Line Item Budget for Year ____ (create budget for each year)			
Benefits Total	0.00	0.00	0.00
Travel:			
Post Award Training - Mandatory Year One Only			
Grantee Meeting - Mandatory each year			
Training Location 1			
Travel Total	0.00	0.00	0.00
Equipment:			
Equipment Total	0.00	0.00	0.00
Supplies:			
Supplies Total	0.00	0.00	0.00
Contractual:			
Personnel Total	0.00	0.00	0.00
Other:			
Office Space			
Local Travel			
Consultant			
Consultant Travel			
Other Total	0.00	0.00	0.00
Total Direct Costs:			
	$0.00	$0.00	$0.00
Indirect Costs/Indirect Rate:			
	$0.00	$0.00	$0.00
Budget Total:			

2. Budget Justification Narrative

The budget justification describes in narrative form the costs and provides the calculations used to obtain the dollar amounts used in the line item budget for the federal and non-federal resources. Ensure that your written explanations are easy to understand, are tied to activities in the OWP and well supported. Explain budget calculations and keep them basic. Like the line item budget, a budget justification narrative is required for each year of the project.

Hint: Where you can, indicate what objective and activity the funds are paying for. 45 CFR 75 requires grantees to track and be able to attribute cost to activities completed.

Note the example of a Budget Justification on the next page:

ORGANIZATION NAME BUDGET JUSTIFICATION			
Category	**Federal Share**	**Non-Federal Share**	**Justification Year 1**
Personnel			
Project Director .3 FTE @ 55,000.00 per year		$16,500	The project director is responsible for carrying out the first six activities in year one, objective one. In addition, the PD assists with 12 other activities in both objective one and two during the first project year.
Training Instructor/Curriculum Developer - 1 FTE @ $45,000.00 x 10 mos.	$37,500		The Training Instructor/Curriculum Developer has primary responsibility for implementation of the project. He must assure that 21 out of 27 activities for the two objectives get implemented successfully
Administrative Assistant – 1 FTE @ $28,000.00 x 10 mos.	$23,333		The administrative assistant works directly with the project director to implement the project. This position provides support to the two other positions in implementing the project.
Personnel subtotal	$60,833.00	$16,500.00	
Fringe			
FICA @ 7.65%	$4,654	$1,262	Social Security/Medicare
FUTA @ .08%	$49	$13	Federal Unemployment Tax
SUTA @ .05%	$30	$8	State Unemployment Tax
Health Insurance @ 12%	$7,300	$1,980	Health benefits
Retirement @ 4%	$2,433	$660	Retirement program contribution
Worker's Comp. @ 2.77%	$1,685	$457	Worker's compensation insurance
Fringe subtotal	***$16,151***	***$4,381***	
Travel			
ANA Post Award Training	$3,470		Travel for Project Director and Finance Manager to attend Post Award Training in Washington, DC: R/T Airfare $600/person; Hotel $800/person; PerDiem $310/ person; Taxi $50
ANA Grantee Mtg	$3,470		Travel for Project Director and Training Instructor to attend the Grantee Meeting in Washington, DC: R/T Airfare $600/person; Hotel $800/person; PerDiem $310/ person; Taxi $50
Travel subtotal	$6,940		
Supplies			
Office Supplies	$430	$770	Office Supplies @ 100.00 per mo. X 12 mos. General supplies such as but not limited to paper, pens, paper clips, post it notes, files.
Supplies subtotal	$430	$770	
Contractual			
			There is no contractual work being done on this project.
Contractual subtotal			
Other			
Curriculum Development Consultant	$6,000		To provide 4 workshops on Curriculum Development for staff and Speakers @ $1,500.00 per workshop
Consultant Travel	$2,000		Consultant travel and per diem to conduct 4 workshops at $500.00 per trip (Lodging=180, MI&E=$161 and GT=$159)
Phone	$600		Phone service & long distance $50 per mo.
Internet	$360		Internet fees @ $30 x 12 mos.
Office space rental		$ 3,600	Rental of 2 office spaces x 10 mo. x $200.00 per mo. per office
Family Appreciation Dinner		$ 1,370	Family Appreciation Dinner for 50 participants, see caterer quote in appendices
Training/meeting supplies	$1,800	$240	Supplies for the training and meetings that will be held through out the first year of the project at $85 per 24 events.
Interactive Smart Board	$3,000		An interactive Smart Board is necessary for curriculum development collaboration and classroom instruction. Quote for Smart Board XYZ is attached in the appendices.
Other subtotal	$13,760	$ 5,210	
Total Direct	$98,114	$ 26,861	
IDC	$9,811		We do not have a negotiated indirect cost rate. Therefore, elected to utilize the 10% de Minimis rate allowed in the regulations 45 CFR Part 75.
Total	$107,926	$ 26,861	

3. Programmatically Justified Costs

The budget narrative should tie the budget to the OWP. Make sure you include all costs to successfully implement your project.

Provide notations in the written justification regarding attached back-up detail such as vendor quotes and consultant work agreements to assist ANA staff and ANA reviewers to determine costs are allowable, relevant, and reasonable. Tie the costs and activities together as much as possible from the application narrative and OWP to the Line Item and Budget Narrative.

Documentation is a key factor of your budget. Be sure to include a Tribal or Board resolution/letter citing the dollar amount or value from the source of your NFS. For example if your Tribe is contributing office space as part of your match, the accompanying resolution should include the fair market value they could charge for that space. Documentation is also required for large ticket items over $5000, (such as construction equipment or vehicles) or unique items (such as specialized technical equipment). And lastly, when consultants are required, include a scope of work or a price quote itemizing the work consultants are responsible for under the contract. Place all the supporting documents in the appendix section of your application.

It is best to work with your accounting office to gather budget data for your organization (i.e., employee salaries and wages, payroll tax rates, worker's compensation insurance rate/quote, and IDC rate). If you are requesting an IDC reimbursement, include a current copy of your organization's Federally-negotiated IDC rate agreement in the "Other Attachments" section of the application. If a current copy of the IDC agreement has not been negotiated, the applicant needs to request from the cognizant agency a memorandum stating that the applicant is authorized to utilize the current IDC until the new one is negotiated or the applicant must request IDC as direct costs. If no IDC rate has been negotiated for your organization, you have 2 options: 1) you could build in the IDCs (e.g., bookkeeping, office space, audit and janitorial) as direct costs under the "Other" line item or 2) you could use the 10% De Minimis rate mentioned in the previous hint box.

Hint: If you use the De Minimis rate be sure to state what administrative costs will be covered by the rate. ANA has to know that you are not charging them in the direct cost for things you will pay for in the De Minimis rate.

Hint: It is a good idea to have another individual double check your calculations prior to submitting your budget. While they are checking calculations, also have them confirm that you are consistently referencing dollar amounts throughout the application. For example, if you describe a staff member attending a training that costs $2,500 in the Approach Criterion, make sure that you don't inadvertently enter $25,000 for the training in the Budget Criterion. Budget inconsistencies are often cited in reviewer comments.

Allowable Costs

45 CFR Part 75 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards details the costs that are allowable, unallowable, and allowable with approval. The cost principles which provide specific information on each of the selected items of cost can be found in 45 CFR part 75.421 through 75.475. In addition, there are certain costs that ANA will not fund. Those costs include:

- Organized fund raising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions;
- Reimbursement of pre-award costs;
- Construction;
- Activities that qualify as major renovations and alterations;
- Purchase of real property;
- Activities in support of any foreseeable litigation against the U.S. government that is unallowable under the Cost Principles in 45 CFR Part 75.

On December 26, 2013 the Office of Management and Budget (OMB) issued 2 CFR Part 200 which consolidates eight OMB Circulars. The objective of the reform is to reduce both administrative burden and risk of waste, fraud and abuse. On December 19, 2014 the Department of Health and Human Services has codified the regulations into 45 CFR Part 75.

The purpose of the revised Federal financial management regulations as codified in 45 CFR Part 75 is to ensure that government funds are used by governments and organizations efficiently and effectively to provide the services and/or goods authorized by the Federal agency that awarded the funds. They also ensure that the governments' and organizations' financial management systems provide accurate, reliable, and timely financial information to the Federal government. The management of an Administration for Native Americans grant requires a working knowledge of the financial assistance rules and regulations and basic cost contained in 45 CFR Part 75.

A chart summarizing Allowable Costs under 45 CFR Part 75 is provided in Appendix C of this manual. Appendix D contains a summary of 45 CFR Part 75.

ACTIVITY 20 ❖ IDENTIFY THE FINANCIAL REQUIREMENTS

1. Using your staffing plan identified in Criterion 3, identify the percentage of time necessary and estimated costs you need to accomplish the project as designed.

Position	**Percent of time dedicated to project** (100%, 50%)	**Estimated Cost** (base this on their current salary)

2. What travel do you anticipate needing for this project?

Description of Travel/Conference	**What benefit is the trip to the project?**

3. Are there any special supplies that will be needed?

4. What are other project specific supplies and services needed for your project?

Need	Purpose	Quantity	Estimated Cost

Getting Your Application Package Together

A competitive proposal requires that the applicant be as organized and thorough as possible. A well-organized application will assist the panel reviewers in locating and evaluating key information during the review process. The ANA application has specific formatting requirements for both hard and electronic copy submission. ANA staff will review the application formatting prior to panel review for compliance purposes.

Application Content and Page Limitations

ANA has established a total page limit of 150 pages for applications submitted in response to the FOA. That page limitation excludes the required forms (including the MS Word version of the OWP), one page project abstract, assurances, and certifications listed under Section IV.2. Content and Form of Application Submission of the FOA. Business Plans are also excluded from the page limitation.

Section IV.2 also outlines the required formatting for your application. The FOA specifies that the narrative section of your application must be double spaced and in 12 point Times New Roman font with 1 inch margins around the page. Failure to adhere to the specific requirements will result in the removal of sections of your application and possible deduction of points. Please refer to this section for the list of documents that are exempt from the formatting requirement.

Use the following sequence of application elements to structure your proposal package:

- Table of Contents
- Project Narrative (Objectives and Need for Assistance, Outcomes Expected, Approach, Geographic Location, Organizational Capacity, Protection of Sensitive and/or Confidential Information, and the Plan for Oversight of Federal Award Funds)
- Line Item Budget and Budget Justification
- Objective Work Plan (OWP)
- Required Governing Body Documentation (Board Resolution)
- Assurance of Community Representation on Board of Directors (for Non-profit applicants)
- Proof of Non-profit Status, if applicable
- Commitment of Non-federal resources
- Job Descriptions
- Resumes
- Indirect Cost Rate Agreement, if applicable

- Letters of Support
- Third Party Agreements, if applicable
- Business Plan, if applicable
- Other attachments if necessary

All required forms, assurances, and certifications including the OMB-approved Objective Work Plan (OWP) form are required and uploaded or included in paper submission (when a waiver is approved). These forms must be completed at Grants.gov and are not included in the page limits. Please refer to Section VIII Checklist of the FOA for additional information.

Submitting a Paper Application

If you are considering a paper format application submission, a waiver is required.

Some applicants may have limited or no Internet access, and/or limited computer capacity, which may prohibit them from uploading large files to the Internet at Grants.gov. To accommodate such situations you can request an exemption from required electronic submission. The exemption will allow applicants to submit a paper application by hand-delivery, applicant courier, overnight/express mail couriers, or by other representatives of the applicant.

To receive this **exemption**, applicants must submit a written request to ACF stating that the applicant qualifies for the exemption for one of two reasons:

- Lack of Internet access or Internet connection, or
- Limited computer capacity that prevents the uploading of large documents (files) to the Internet at Grants.gov.

Applicants may request and receive the exemption from required electronic application submission by either:

- Submitting an email request to electronicappexemption@acf.hhs.gov, or
- Sending a written request to the Office of Grants Management Contact listed in *Section VII. Agency Contacts* of the funding announcement.

An exemption is applicable to all applications submitted by the applicant organization *during the Federal Fiscal Year (FFY) in which it is received*. Applicants need only request an exemption once in a FFY. Applicants will need to request a new exemption from required electronic submission for any succeeding FFY.

***Please Note: electronicappexemption@acf.hhs.gov may be used only to request an exemption from required application submission*. All other inquiries must be directed to the appropriate Agency Contact listed in *Section VII*. of the funding announcement. Queries submitted to this email address that make requests for any reason other than a request for an exemption will not be acknowledged or answered.

Exemption requests by email to electronicappexemption@acf.hhs.gov and by postal mail must include all of the following information:

- Funding Opportunity Announcement Title
- Funding Opportunity Number (FON)
- The listed Catalog of Federal Domestic Assistance (CFDA) number
- Name of Applicant Organization and DUNS number
- Authorized Organization Representative (AOR) name and contact information
- Name and contact information of person to be contacted on matters involving the application
- The reason the applicant is requesting an exemption from electronic application submission. The reason must be either the lack of Internet access or connection, or lack of computer capacity that prevents uploading large documents (files) to the Internet.

Exemption requests must be ***received by*** ACF no later than two weeks before the application due date. This is 14 calendar days prior to the application due date. If the fourteenth calendar day falls on a weekend or Federal holiday, the due date for receipt of an exemption request will move to the next Federal business day following the weekend or Federal holiday. However, it is suggested to submit this request 30-60 days prior to the due date.

Submitting an Electronic Application

Prior to even writing your application, and at least three months before you need to submit your application, there are a number of steps you need to accomplish:

- You need to establish a DUNS number
- Register in the SAM system
- Establish a Grants.gov account or submit a waiver from electronic submission.

This chapter will provide you with additional information on the steps you need to undertake in order to successfully apply to ANA. A helpful video series for this section is an “Introduction to Grants.gov Video Series” which covers, DUNS, SAM and Grants.gov registration, user roles, searching for grants, the application package, submitting the package and verification emails. The following link will take you to the video series in

YouTube :
https://www.youtube.com/playlist?list=PLNSNGxQE7NWlPcYxVJsglJbRc6cPcfC8X

DUNS Number and SAM Registration

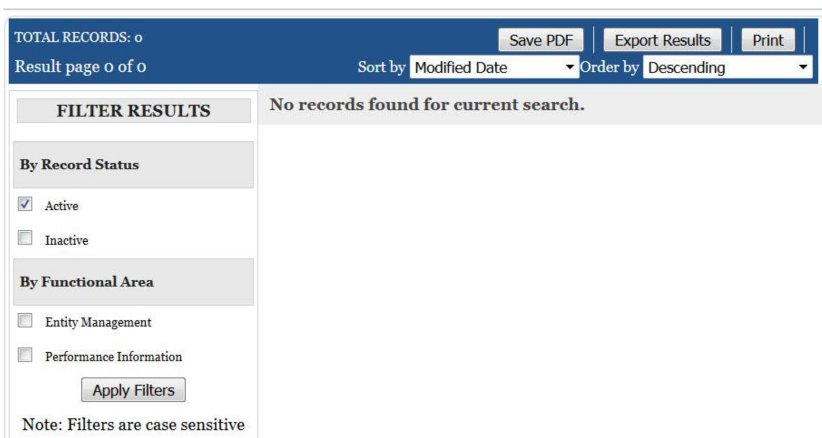
Your organization must have a Data Universal Numbering System (DUNS) number and a current System for Award Management (SAM) registration prior to applying for federal funding.

1. DUNS Number

The Data Universal Numbering System (DUNS) is a nine-digit number used to identify business entities on a location-specific basis. The DUNS number provides the government and other organizations a wealth of information about each registered business, including the business name, physical and mailing addresses, trade styles ("doing business as"), principal names, financial, payment experiences, industry classifications (SICs and NAICS), socio-economic status, government data and more. The DUNS Number is a system copyrighted by Dun & Bradstreet (D&B).

A DUNS Number is obtained at no cost by registering online or by phone. Whether you are submitting a paper or electronic application, a DUNS number is required for every application, for a new award or continuation of an award, including applications or plans under formula, entitlement, and block grant programs. For detailed instructions visit the website at http://fedgov.dnb.com/webform.

It is suggested that prior to completing a new registration you do a search to ensure your organization is not already registered. The simplest way to complete a search, go to http://www.sam.gov and select the “Search Records” button.



If your business does not appear in the search results, search for “active and inactive vendors” to see if your business has been registered before and the registration needs to be renewed and revalidated.

If you do not have a DUNS number, you will need to obtain one. You will need to provide several bits of information to obtain a DUNS number for your organization:

- Legal Name
- Headquarters name and address for your organization,
- Doing business as (DBA) or other name by which your organization is commonly known or recognized
- Physical Address, City, State and Zip Code
- Mailing Address (is separate from Headquarters and/or physical address)
- Telephone Number
- Contact Name and Title.

After you have completed the registration you will be issued a DUNS number in approximately 5 business days.

2. SAM

The System for Award Management (SAM) is a free website that consolidates the federal procurement systems and the Catalog of Federal Domestic Assistance (CFDA). You must register with SAM in order to apply for federal funding (including ANA).

If you previously registered for CCR, you are automatically registered with SAM. You will still need to create an account in SAM even if you had a CCR account. The Help Tab following link provides several videos to assist with SAM.gov:
https://www.sam.gov/portal/SAM/?navigationalstate=JBPNS_rO0ABXdcACJqYXZheC5mYWNlcy5wb3J0bGV0YnJpZGdlLlNUQVRFX0lEAAAAAQApdmlldzo2YzA0OWExOS1jMWVjLTQyNWMtYTliOC05YzBkYzQ3ZGQ0ZjIAB19fRU9GX18*&portal:componentId=7b9b1ff4-9b43-460c-9313-a2fabdc07366&interactionstate=JBPNS_rO0ABXc5ABBfanNmQnJpZGdlVmlld0lkAAAAAQAYL2pzZi9oZWxwL3NhbUhlbHBOYXYuanNwAAdfX0VPRl9f&portal:type=action#1

User Guides and FAQs can be found in the help section at the following link:

https://www.sam.gov/portal/SAM/?navigationalstate=JBPNS_rO0ABXdcACJqYXZheC5mYWNlcy5wb3J0bGV0YnJpZGdlLlNUQVRFX0lEAAAAAQApdmlldzplZTM1ZDk0Ni05MzgxLTQ5MjUtOTFjMS00MmE0MDk3NmExYmYAB19fRU9GX18*&portal:componentId=7b9b1ff4-9b43-460c-9313-a2fabdc07366&interactionstate=JBPNS_rO0ABXc5ABBfanNmQnJpZGdlVmlld0lkAAAAAQAYL2pzZi9oZWxwL3NhbUhlbHBOYXYuanNwAAdfX0VPRl9f&portal:type=action##11

In order to create an account with SAM:

- Go to https://www.sam.gov
- Click the “Create User Account” button
- Click the “Create Individual Account” button
- Provide the requested information and submit
- Receive the email from “notifications” and click through the sam.gov link to validate your account
- Log in at https://www.sam.gov with the username and password you created.

Once you have created an account you can now register with SAM:

- Access the SAM online registration at https://www.sam.gov
- Click on “Register/Update Entity” button.
- Log In with your Account information and complete and submit the online registration. The SAM user guides above can assist you in completing the registration and answering questions you may have
- The registration process will take approximately 30 minutes depending upon the size and complexity of your entity.
- The SAM help tab has Frequently Asked Questions (FAQs), Quick User Guides and Videos that you may find useful as well.

You must renew and revalidate your entity’s registration at least every 12 months from the date you last certified to and submitted the registration in SAM - and sooner, if your entity’s information changes. To renew simply log into your SAM account select “Register/Update Entity” and then “Complete Registrations”***.*** If you have an inactive profile, log into your SAM Profile and click “Inactive Registration”.

Hint: Your SAM E Business Point of Contact (EBiz POC) must update your SAM profile at least once a year. Failure to update the profile can prevent you from being able to submit your application.

3. Grants.gov

Once you have completed the previous two registration steps (DUNS and SAM) you are ready to register with Grants.gov at http://www.grants.gov/web/grants/register.html. This registration process can be as short as five business days or as long as four weeks, so it is important to register early. A video to assist with this process can be found at the following link in YouTube:
https://youtu.be/wH_g7x7sdDM?list=PLNSNGxQE7NWlPcYxVJsglJbRc6cPcfC8X

It may be necessary for Grants.gov to mail certain security information to your organization; if you live in a remote area where mail is slow to reach you or experiences delays, this process can take longer than the four weeks. The information you entered in the SAM registration is electronically transferred from SAM to Grants.gov and individuals within the organization are now able to register with Grants.gov. You must register with SAM prior to registering in Grants.gov.

There are two types of registrations possible in Grants.gov: one for individuals and one for organizations. When registering, choose the option for organizations. This applies to a company, state, local, or tribal government, academia or research institution, not-for-profit or any other institution. Help for registering as an Organization Applicant can be found at: http://www.grants.gov/web/grants/applicants/organization-registration.html

Additionally you will need to understand and know what your user role will be: E Business Point of Contact (EBiz POC) or Authorized Organization Representative (AOR). The EBiz POC manages all of the individuals in their organization who can submit grant applications. The AOR has the ability to submit grant applications on behalf of their organization. A brief video explaining these user roles can be found at the following link in YouTube:
https://youtu.be/ulAr4ZzIsQU?list=PLNSNGxQE7NWlPcYxVJsglJbRc6cPcfC8X

Once all of the registrations are completed you will be ready to get the application package from the Grants.gov website, download it to your computer, save it, fill it out, attach your files, and submit the application packet. We will take you through the steps for this. You may also want to view a quick tutorial of these actions, which can be found on the Grants.gov website under Applicant Resources at:
http://grants.gov/assets/CompletingaGrants.govApplication.html.

Hint: Have your E Business Point of Contact (EBiz POC) check their email (junk email too) for requests from Grants.gov to update or approve AORs grants submission privileges. If they don't approve you as requested, you will not be able to submit your application.

Find and Fill-out The Application Package

From the Grants.gov homepage select the Applicants tab. Next click Applicant Tools & Tips, located on the left side of the page. To verify if you have a compatible version of Adobe Reader or Adobe Acrobat installed, click on the following test application package link: http://www.grants.gov/documents/19/18249/Adobe+Versioning+Test+Application+Package.pdf/61ba3e00-b4b6-494e-b510-1a8b43c2bc03

If you can see the application package, you are able to complete and submit grant applications on Grants.gov. Grants.gov supports Adobe Reader version 9.0.0 and later. If you cannot see the package several things may be happening:

Your browser settings may be keeping you from opening the test package. A quick solution is to save the test application package to your desktop (by right-clicking on the link) and open it separately.

You may not have the correct version of Adobe Reader. Go to https://get.adobe.com/reader/ and install a FREE Adobe Reader to work with your application package. Be aware that sometimes there is other software selected to load with the Adobe Reader, if you do not want this you must deselect it.

***Please note: If you do not complete this step, then your application could receive errors that may cause it to be rejected by Grants.gov. This can include errors from free PDF software. While a list of software to create PDFs is available, Grants.gov does not endorse any of them. Also, if more than one person is working on the same application EVERYONE must be using the same software version.*

You will need to locate the application package on Grants.gov. To do this, go to the homepage at http://www.grants.gov/ and select **Search Grant Opportunities** from the navigation on the left side of any Grants.gov screen. From this page conduct a **Basic Search**, this is the simplest way to locate the application package.

Use the CFDA number located in the Funding Opportunity Announcement (FOA) to search for the application package. This information is generally located on the first page after the Table of Contents near the top of the page. For further information on searching for grants can be found at the following link in YouTube: https://youtu.be/NYs5CZYc774?list=PLNSNGxQE7NWlPcYxVJsglJbRc6cPcfC8X

1. Download a Grant Application Package

On this screen you will enter the CDFA number found earlier in the FOA. Once the CDFA number is entered click the “Search” button. This will bring up the applications available to download for this CFDA number.

Depending on the CDFA number there may be more than one application available to download. Be sure you download the correct application package from the “Package” tab to avoid receiving errors and possible application rejection.

Save the application package to your computer. Once the application is saved to your computer you will not need to be online to complete the application. You will be able to complete the application on your computer. Once you have saved the application open it to ensure it is the application you intended to download. Applications can be completed in their entirety offline; however, to submit an application you will need to be connected to the Internet.

While you are working on your application you can save at any time by selecting the **Save** button at the top of your screen. You can then close the application and come back to it later. The **Save & Submit** button at the top of the screen will not be functional until the application is properly completed and saved. If you have any application specific questions, contact the funding agency directly, using the contact information provided on the application's cover page.

As you begin to complete the application there are some **important items** to mention:

- Highlighted fields in grey (and change to yellow when you click on them) are mandatory and must be filled in.

Error messages will pop-up if a mandatory field is not filled in.

- If a mandatory field is not filled in, then you will be unable to submit the application.
- Make sure that your Organizational DUNS in #5 is the same as the DUNS associated with your User Name.
- Changes are NOT automatically saved - you MUST hit the **Save** button before closing the application while you are working on it.
- Remember to save often to avoid losing your work.

2. File Naming Conventions

Carefully read and observe electronic file naming conventions. Improperly named files will not pass validation at Grants.gov. Such applications will not be received by ACF and are disqualified from competitive review.

Please limit file names to 50 or fewer characters.

- Do not attach any documents with the same name. All attachments should have a unique name.
- Attachments that do not follow the following rule regarding the use of special characters may cause the entire application to be rejected or cause issues during processing.

The table below lists allowable special characters that can be used in file names.

A—Z	**Comma ,**	**Hyphen –**	**Plus sign +**	
a—z	**Curly Braces {}**	**Number Sign #**	**Semicolon ;**	
Ampersand &	**Dollar Sign $**	**Parentheses ( )**	**Space**	**Underscore _**
Apostrophe ‘	**Equal Sign =**	**Percent Sign %**	**Square Brackets [ ]**	
At sign @	**Exclamation Point !**	**Period .**	**Tilde ~**	

***Ampersand in XML must use the & format**

Hint: Do not use native language to label files as this could cause a validation error impacting the application submission. Native Language diacritical markings may not be read by the system and could cause an error.

Failure to use the standard naming conventions will cause a validation error during the application submission process which could potentially eliminate your application from consideration in the competition if the error isn’t corrected prior to the application deadline.

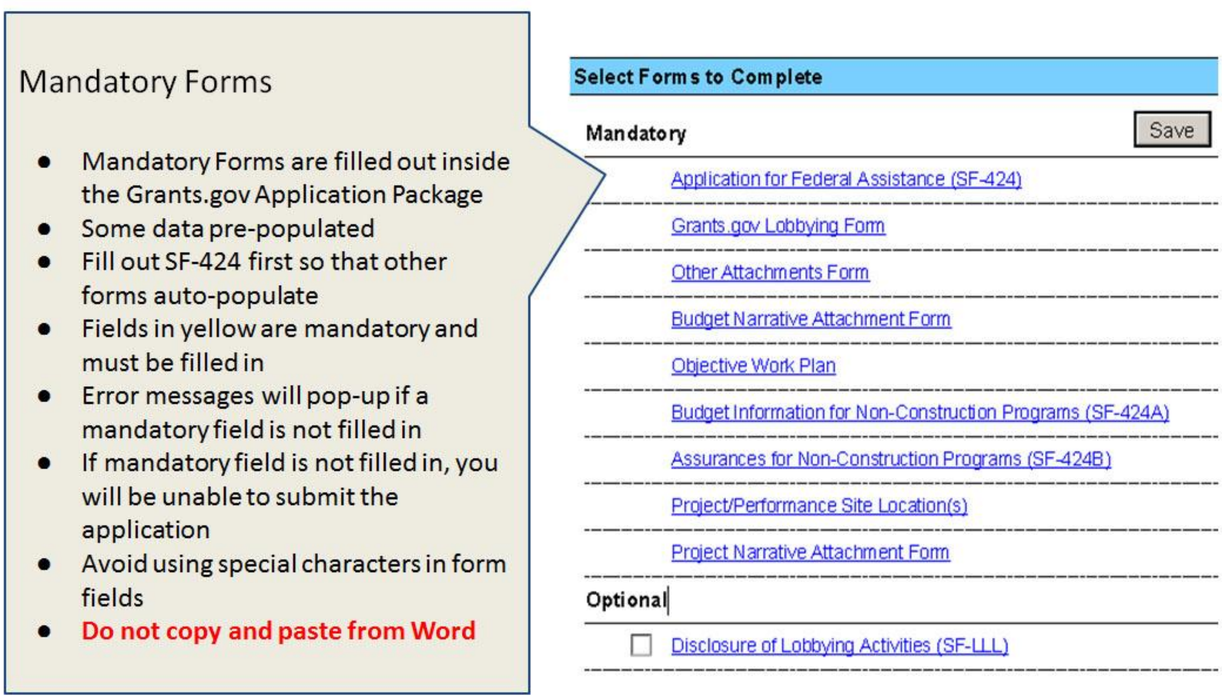
The application home or cover page has many components important to you as an applicant:

- Opportunity Title and Number - ensure you are filling in the correct packet for your application type
- Closing date - if you submit the application after this date it will not be reviewed

- Agency contact information - who to contact if you have some questions
- Application Filing Name - note special instructions above
- Mandatory Forms - forms that must be submitted or your application will be rejected
- Optional Forms - these forms may not pertain to your organization, thus not mandatory by the agency
- Save button - this allows you to save the application to your desktop and work on it at different times, saving your work as you go
- Check Package for Errors button - provides you with hints of possible errors prior to submission
- Print button - allows you to print the application packet (this does not include full attachments - only the placeholder page)

3. Documents

Open and complete all of the documents listed in **Mandatory Documents** list. The documents listed in the Mandatory Documents list may be predefined forms, such as SF-424, or documents that need to be attached, such as the Project Narrative**.** **Mandatory Documents** are required for this application. The electronic OWP form is listed in the **Optional Documents**.



Note: Updated screenshots were not available by manual print deadline. 2016 screen shots may be slightly different than what is depicted here.

To open a form, use your mouse to select the item, it will take you to the top of the form. Fill in the requested information. Save your application regularly so that you don't lose your work. The application can be saved by clicking the Save button in the middle of the page. Use the form link to return to the page you were working on. You can also use the Ctrl + S keyboard combination to save the application while working on the application.

It does not matter what order you select the Mandatory and Optional documents. They will appear in a predetermined order set within the application package.

1. SF-424 Application for Federal Assistance
2. Grants.gov Lobbying Form
3. Other Attachment Form
4. Budget Narrative Attachment Form
5. Objective Work Plan
6. SF-424A Budget Information - Non-Construction Programs
7. SF-424B Assurances - Non-Construction Programs
8. Project/Performance Site Location(s)
9. Project Narrative Attachment Form
10. Disclosure Of Lobbying Activities

When you open a Mandatory Form, the fields which must be completed are noted by an asterisk and are highlighted (in gray or yellow) with a red border. Optional fields and completed fields are displayed in white. If you enter invalid or incomplete information in a field, you will receive an error message.

****Please Note: When you are tabbing out of a required field without completing it, a message will display informing you that it is required to fill out.***

Forms, such as SF-424, which are predefined, will require you to enter information into the highlighted fields*.* ****Please Note: When you complete the SF-424 first, it will automatically populate the other forms with similar fields with the information you entered.***

For each of the mandatory forms, we will cover those items on the form that are not intuitive when filling them out. For detailed assistance we suggest you download the instructions for the forms at http://www.grants.gov/web/grants/form-instructions.html, look in the instructions

you downloaded with the application package, contact your ANA Regional T/TA Center or contact the ANA Help Desk at Toll Free Phone: 1-877-922-9262 or E-mail: anacomments@acf.hhs.gov

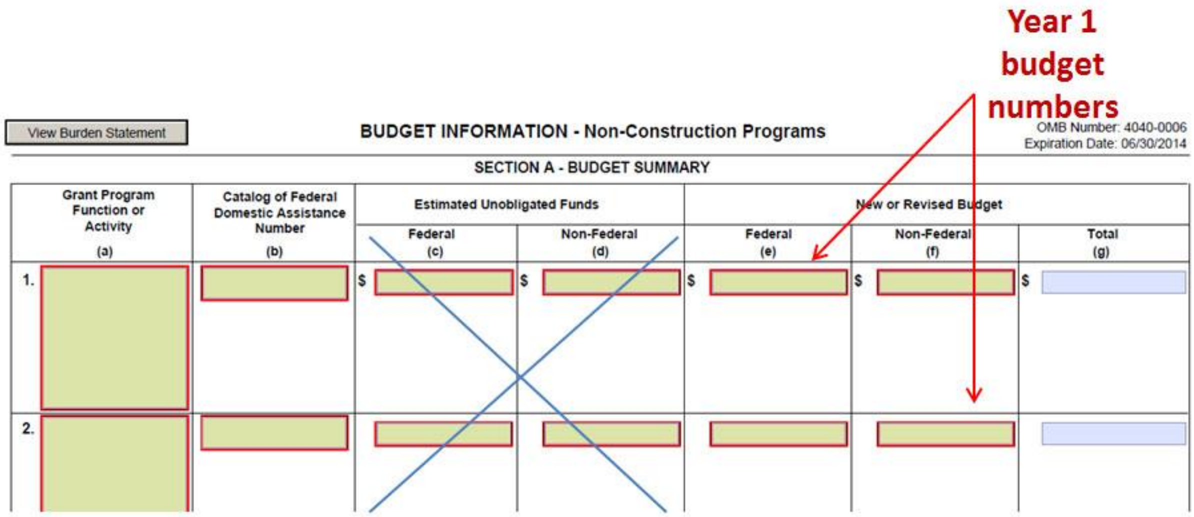
4. SF 424

When filling in #18, "Estimated Funding" section of the SF-424 it is important that you only use the numbers for budget year one. Enter the amount requested, or to be contributed during the first funding/budget period by each contributor. The value of in-kind contributions should be included on appropriate lines, as applicable.

5. SF 424A

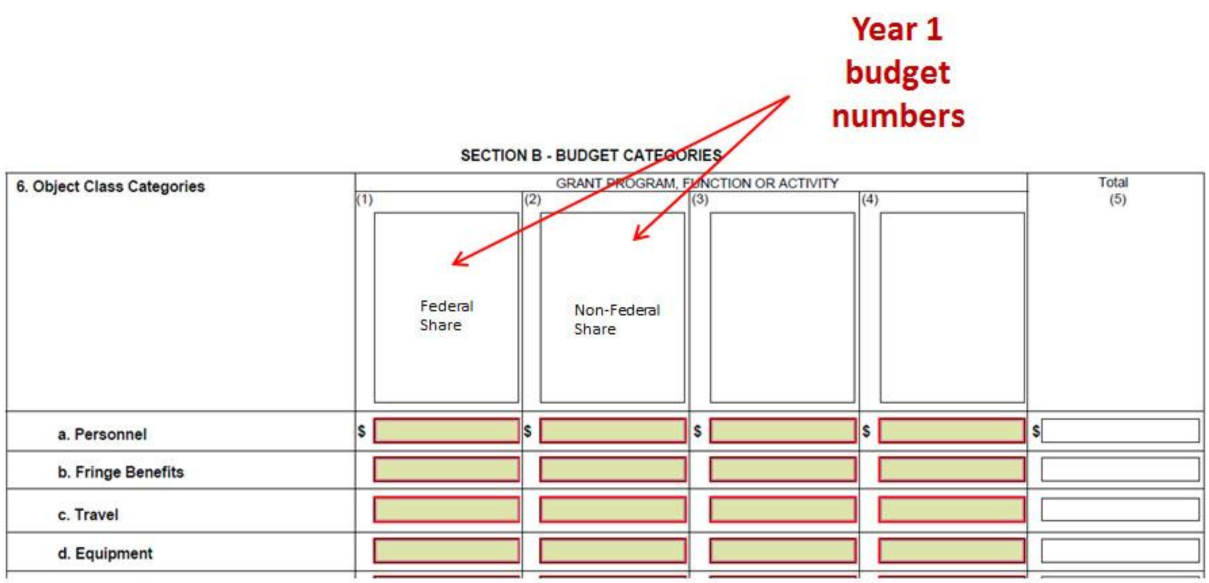
There are several sections of this form that applicants have found a bit confusing, so the 424a is thoroughly covered in this manual. However, we suggest you download the instructions for details of each section. ***Please Note: In this form some of the fields will pre-populate similar areas and some do not, take care to be sure each section is filled out clearly.*

In SECTION A – **BUDGET SUMMARY** it is worth mentioning that this section will be filled out only using the budget for year one. Fill out Line 1 for the Federal Share and Line 2 for the Non-Federal Share. Under the Grant Program Function or Activity (a) you will type in the grant program under which you are applying under, for example *SEDS*. Under the Catalog of Federal Domestic Assistance (b) you will type the CDFA number you found in the FOA to search for and download the application package. If this is a new application you will leave Columns C and D blank. Under the New or Revised Budget heading **Federal (e)** you will enter the amount of federal funding being requested for year one, and for **Non-Federal (f)** you will enter the NFS amount identified in your budget for year one.

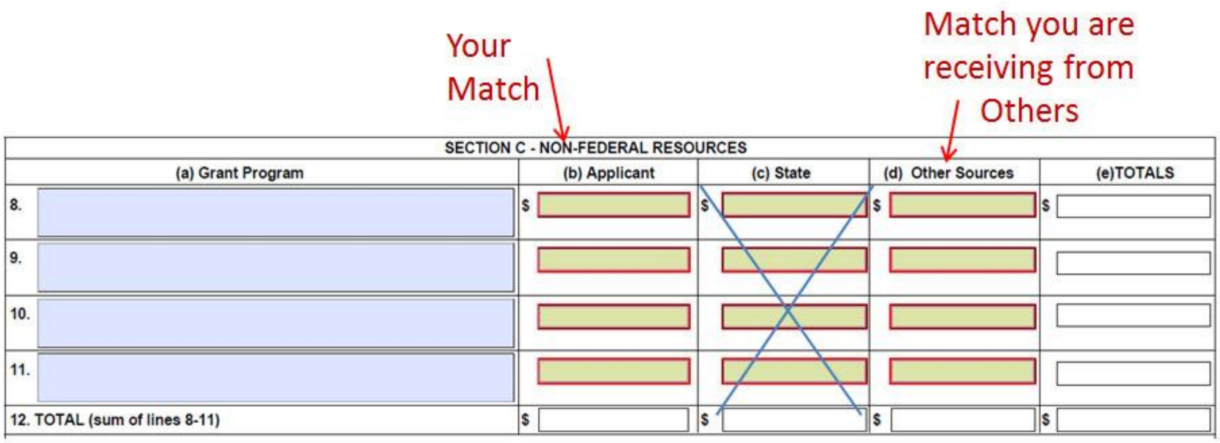


In SECTION B – **BUDGET CATEGORIES**, #6 Object Class Categories, Column 1 you will complete this column entering the total amount of the Federal Share and in Column 2 Non-Federal Share funding for budget <u>year one</u> for each of the categories listed.

Hint: ACF prefers that this section be filled out using the following directions: In column 1 enter the Federal amounts for each of the categories listed for the first budget year which should total the amount entered in 1(e) above. In column 2 enter the Non Federal amounts for budget year one for each of the categories listed which should total the amount indicated in 2(f) above



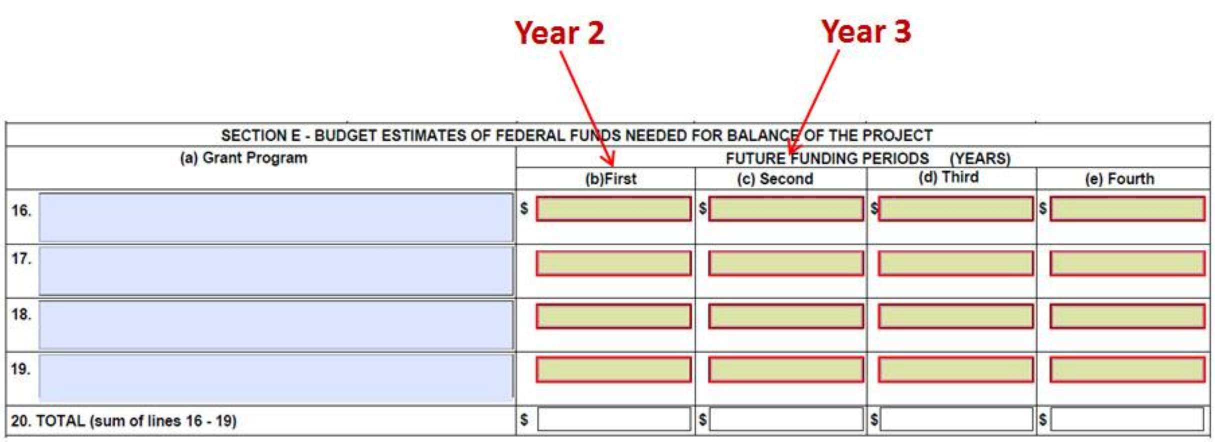
In SECTION C – **NON-FEDERAL RESOURCES**, most applicants need only fill out line 8 columns (b) Applicant and (d) Other Sources. The Applicant column is where you, the applicant, will list your match contribution. The Other Sources column is where you list match (cash or in-kind) that you are receiving from others.



SECTION C - NON-FEDERAL RESOURCES				
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e)TOTALS
8.	$	$	$	$
9.				
10.				
11.				
12. TOTAL (sum of lines 8-11)	$	$	$	$

In SECTION D – **FORECASTED CASH NEEDS**, this is the first year budget broken down by quarters for both the Federal and Non-Federal share. Here you will estimate how you will spend out the first year budget each quarter. Be realistic in this section rather than just dividing by 4. If you have a large number of supplies or equipment to purchase in a particular quarter be sure to estimate the spending accordingly.

In SECTION E **- BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT**, most applicants will only be using line **16** for their project. In the proper columns list the amounts of only the Federal funds which will be needed to complete the project over the succeeding funding periods (usually in years). *For example, if you have a three year project you will use the first two columns to input the Federal funds requested for years two and three of your project.*



SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT				
(a) Grant Program	FUTURE FUNDING PERIODS (YEARS)			
	(b)First	(c) Second	(d) Third	(e) Fourth
16.	$	$	$	$
17.				
18.				
19.				
20. TOTAL (sum of lines 16 - 19)	$	$	$	$

6. Submitting Specific Required and Additional Documents

In addition to forms, application packages also require you to submit specific documentation, such as a project narrative, budgets, resolutions, letters of commitment, and resumes. Specific instructions for your additional documentation will be included in the funding announcement and application package.

> **Hint:** ANA has received a special exemption from the two file limitation. This exemption applies to ANA only and not to other ACF or other agency programs. Although ANA has this exemption, they strongly encourages applicants to follow the file guidelines described below, as it is the only way to assure that information is presented in the order the agency expects to see it in.

Follow the steps below to submit the file attachments in the application package. Each of these file attachments, **The Project Narrative Attachment, Budget Narrative Attachment Form** and the **Other Attachment Form** will contain a single file made up of several of your documents and spreadsheets. Standard Forms will not be considered as additional files. The main point to keep in mind is that you will have numerous documents that will make up each of these attachments. You can find additional certification forms that may pertain to your project at the following link on the ACF website: http://www.acf.hhs.gov/grants/certifications

While ANA does not limit the number of attachments to your application it is recommended that you only attach *Four Files*. Attaching only these files assists in keeping information presented to the reviewer in an easy to follow format. This is accomplished using the three **Mandatory** attachment forms provided in the application packet: Project Narrative Attachment Form, Budget Narrative Attachment Form and Other Attachments Form. The Fourth file will be the Objective Work Plan, located under **Optional** if using the electronic form **OR**, you will need to upload through **Add Optional Other Attachment** if using the Word version OWP**.**

> **Hint:** If you are using Adobe Reader you will not be able to apply page numbers to the application file. Please number your pages when you create your documents prior to making a PDF of your multiple documents.

Project Narrative Attachment Form

The first of the file attachments is

The Project Abstract Form is no longer pre-packaged!

You must create your own *Project Abstract*:

- **1 Page Only, Single Space, Times New Roman 12 pt. font**
- **At Top of page:**
  - **Project Title**
  - **Applicant Name**
  - **Address**
  - **Contact Phone Numbers**
  - **E-Mail Address**
  - **Web Site Address, if applicable**
- **Summary of Project Description - clear, concise**

File #1 - Attach Single PDF File Containing:

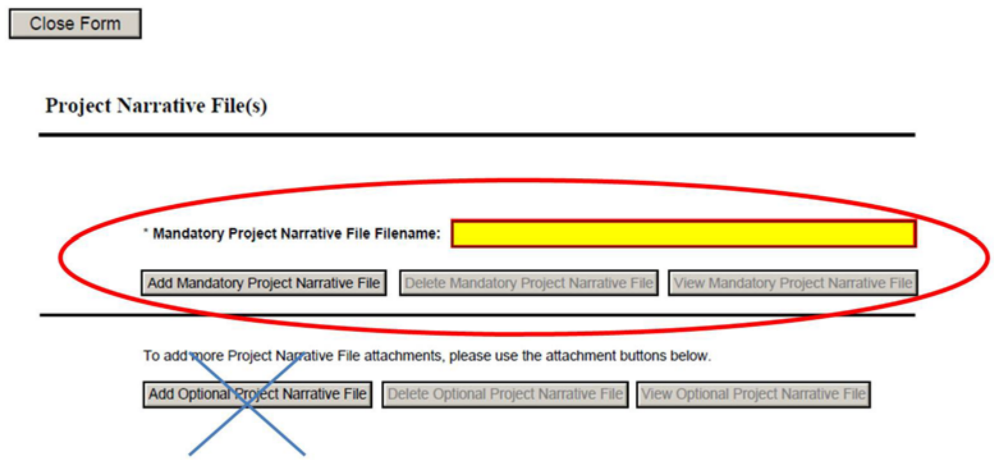
- Project Abstract
- Table of Contents
- Need for Assistance
  - Problem Statement
  - Long-Term & Project Goal
  - Geographic Location
- Outcomes Expected
  - SMART Objectives
  - Results & Benefits
  - Impacts
  - Impact Indicator
- Project Approach
  - Planning & Implementation
  - Community Involvement
  - Organizational Capacity & Staffing Plan
  - Protection of Sensitive Data
  - Contingency Plan
  - Sustainability Plan
  - Plan for Oversight of Federal Funds

Number all pages.

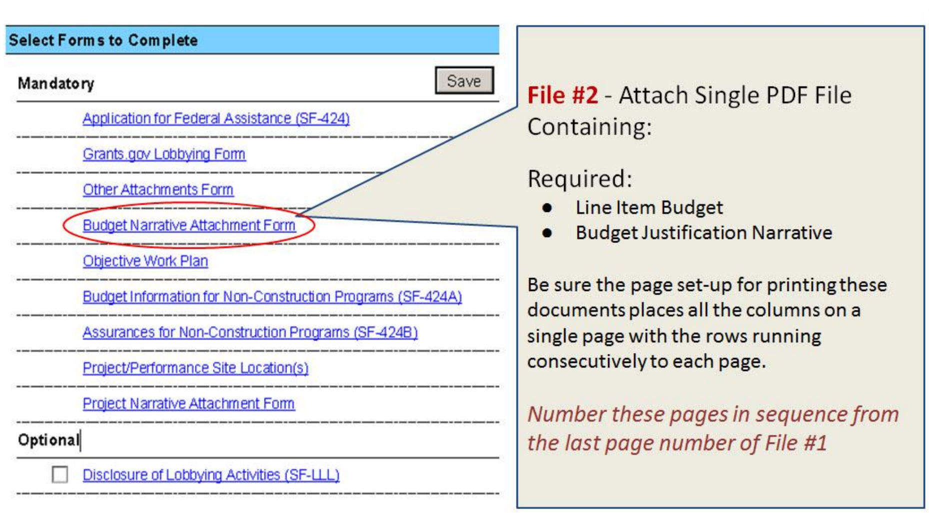
The Project Narrative Attachment Form. This form is a placeholder for you to attach a single file from your computer that is made up of multiple documents: Project Abstract, Table of Contents, and Project Narrative. Please remember your Project Narrative contains the Need for Assistance, Outcomes Expected, and the Approach sections of the scoring criteria.

The Project Abstract is no longer a form. You will need to create your own **one page** form. This will be in Times New Roman 12pt font and single spaced. The top of the page should include the Project Title, Applicant Name, Address, Contact Phone Numbers, Email Address and Website if applicable. The rest of this one page document should be a brief well-defined description of the project.

To attach your combined files select the **Add Mandatory Project Narrative** button. This will allow you to search your computer for the new single file you created of the multiple documents. Select the file and click the **Open** button. You will see the name of your file in the highlighted field. When you have completed the actions for this form, scroll back to the home page for the next form. *Do **NOT** use the **Add Optional Project Narrative File** button.*



Budget Narrative Attachment Form



The second file attachment form is the **Budget Narrative Attachment Form**. Like the Project Narrative form, this is a placeholder to provide a place for you to attach a single file from your computer made up of multiple documents. This file will contain your Line Item Budget and Budget Justification narrative. It is recommended to create the Budget files in Excel and save them as a PDF.

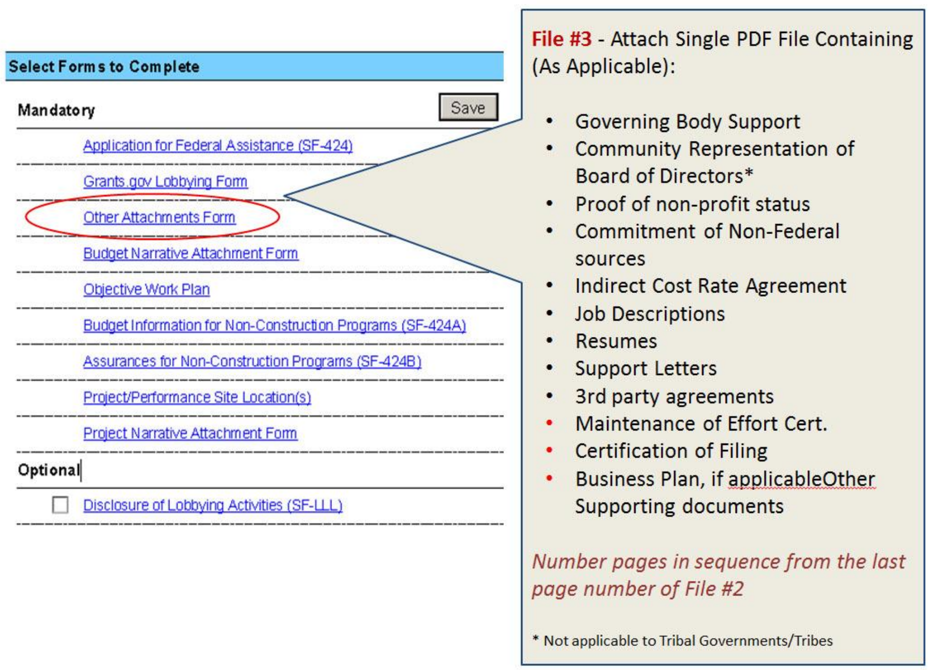
To attach your combined files select the **Add Mandatory Budget Narrative** button. This will allow you to search your computer for the new single file you created of the multiple documents. Select the file and click the **Open** button. You will see the name of your file in the highlighted field. When you have completed the actions for this form, scroll back to the home page for the next form. *Do **NOT** use the **Add Optional Budget Narrative File** button.*

When saving as a PDF it is important to set the print area in a way that all of the columns will appear on the same page with rows continuing on sequentially. This will allow the reviewer to have a complete view of each budget category.

A	B	C	D	E
	Viewing all Columns across Same Page			
	Line Item Budget for Year ____ (create budget for each year)			
	Category	Federal Share	20% Non-Federal Share	Total

Other Attachments Form

The **Other Attachments Form** includes the governing body documentation (Tribal Resolution) and optional documents not included elsewhere in the application package, such as resumes, job descriptions, community meeting minutes, and survey results. To help keep documents in a logical order, it is suggested that you combine your multiple documents in the order you believe the material is best understood. When you have finished combing the documents, you can save this as a new single file and then attach this newly created single file to the application package.



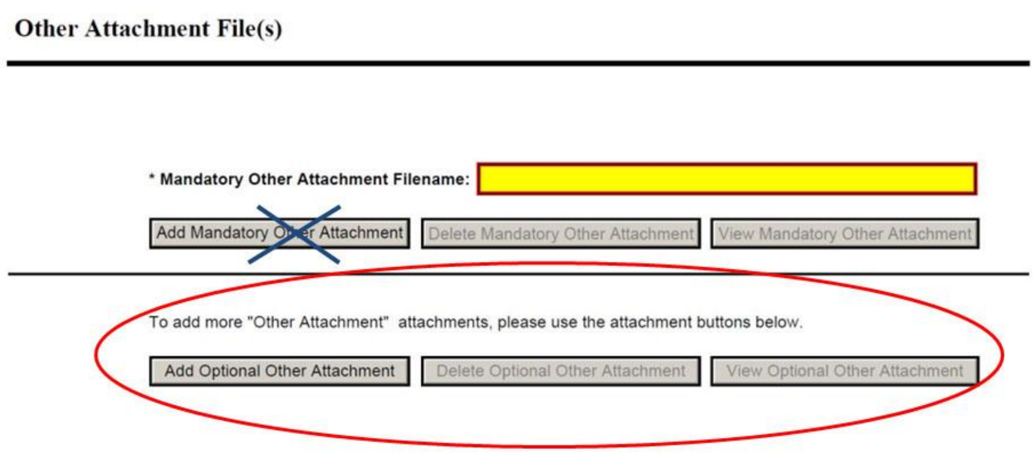
To attach your combined files, select the **Add Other Mandatory Attachment** button. This will allow you to search your computer for the new single file you created of the multiple documents. Select the file and click the **Open** button. You will see the name of your file in the highlighted field. When you have completed the actions for this form, scroll back to the home page for the next form. *Do **NOT** use the **Add Optional Other Attachment** button except as noted below when using the MS Word version of the OWP.*

Objective Work Plan Form

Lastly, we will cover the **Objective Work Plan Form**. The OWP form (electronic or MS Word version) is not counted in the 150 page limit as it is an ANA mandatory OMB approved form.

The electronic Objective Work Plan is found under the **Optional Forms** in the packet. Although it is under Optional Forms, it is still a *<u>mandatory document</u>* required by the FOA for your application submission.

If you are using the MS Word version of the OWP, be sure you check that it has a current OMB date stamp. Save your completed form as a PDF and upload it as a separate ***4th File*** using the **Add Optional Other Attachment** button from the Other Attachments Form link under the Mandatory forms.



Hint: If you choose to upload the MS Word version of the OWP you still must fill out the mandatory yellow fields in the OWP form that is a part of the package. If you don't fill out those fields your application package will contain errors and will be rejected.

Select the **Add Optional Other Attachment** button. A separate blue box will pop up, select the **Add Attachment** button which will allow you to search your computer for the PDF file of the OWP you created. Select the file and click the **Open** button. You will see the name of your file in the highlighted blue box. Select the **Done** button. When you have completed these actions for this form, scroll back to the home page for the next form.

For a complete **Application Checklist** of the required documents and forms be sure to consult section VIII the current FOA. If you have submitted to a funding agency before, then be sure to download the most recent funding announcement as many agencies make changes from year to year. Because changes to the funding announcements can occur even after the funding announcement has been released it is always a good practice prior to submitting your application to check Grants.gov for any modifications that have been made. Additionally, setting your email up to receive change notifications when downloading the application will assist you in becoming aware of any modifications the funding agency may apply. Further instructions can be found on the Grants.gov website: http://www.grants.gov/help/html/help/index.htm#t=Applicants%2FDownload_an_Application_Package_Single-_or_Multi-Project.htm%3Frhhlterm%3Dnotifications%26rhsyns%3D%2520

7. Printing Your Application

To print your application, select the **Print** button on the cover page at the top of your screen. It is recommended that you review a printed copy of your entire application before submission to make sure you have uploaded the correct version of mandatory and optional forms. The print function will not print the attachments within an application package, such as the narrative, budget and other attachments.

8. Finalizing Your Application

Once you have completed all required documents and attached any required or optional documentation, select **Save** to save your package. If errors are found, select the **Check Package for Errors** button which will identify each error. Then correct each error.

If there are no errors, when you save the package the **Save & Submit** button will be activated.

Select the **Check Package for Errors** button at any time to ensure that you have completed all required data fields. The following link contains details about checking for errors:
https://www.youtube.com/watch?v=O1Vm8iGIm6w&index=6&list=PLNSNGxQE7NWlPcYxVJsglJbRc6cPcfC8X

The **Save & Submit** button will become active after all errors have been resolved and the package has been saved. Select the **Save & Submit** button and save the application again. You are required to save the application at this point to begin the application submission process.

Make sure you are connected to the Internet when ready to submit. Once you have saved the application using the **Save & Submit** button, a dialog box will appear and you will need to enter your Grants.gov username and password. Follow all on-screen instructions for submission.

TO SUBMIT YOU MUST BE REGISTERED

After clicking the **Save & Submit** button you will be prompted to log in to Grants.gov with your Grants.gov username and password. It is also recommended you submit your application package *as early as possible* in the event you experience any issues.

******Please Note: If you are not designated as an Authorized Organization Representative (AOR) and attempt to submit, you will receive the following system prompt:

> "Your application cannot be submitted because you are not designated by your organization as an Authorized Organization Representative (AOR). Please contact your eBiz Point of Contact to get the AOR role assigned to you and then resubmit the application."

SIGN AND SUBMIT

The final step is to click on Sign and Submit. By doing so you are authenticating your application submission. The following link contains a video with further details:
https://youtu.be/J79kmpkLHtw?list=PLNSNGxQE7NWlPcYxVJsglJbRc6cPcfC8X

9. Confirmation for Completing and Submitting an Application

After submitting your package you will receive a confirmation screen. This screen will contain a Grants.gov tracking number which can be used to track the status of your application on Grants.gov. Write the confirmation number down. The Tracking Number is the identifier for your specific application and should be utilized if you need to contact the Grants.gov Contact Center or the receiving agency. The confirmation page has a URL you can click to check the status of your application in the Grants.gov system. The following link contains a video detailing the confirmation emails: https://youtu.be/lNLpT8eWZJ0?list=PLNSNGxQE7NWlPcYxVJsglJbRc6cPcfC8X

- The receipt confirmation screen contains a date and time stamp of the application submission as well as the submitter's name and DUNS #
- Keep this information for your records

To see the complete status of all submitted packages, you must login. This does not provide any status on the award. Grants.gov does not maintain award data nor are they involved in the award process. ANA will notify you regarding your application.

Please Note: You can utilize the new Track My Application functionality to view the status of up to five applications

After Application Submission you will be contacted via email *at least three times* for each step in the submission process, which is generally 24 to 48 hours after submission (this timeframe may differ so check often).

- **Receipt Email** – this email confirms receipt of the application package by the Grants.gov system, and gives a URL and tracking number that can be used to find out the status of a submission without login.
- **Validation Email** – this email confirms validation of the technical components of the application package components by the Grants.gov system.
  a. The validation does a virus scan and checks to ensure the DUNS # you entered in the application package is the exact same DUNS you utilized for your registration
  b. If your package has errors you will receive an email: "rejection due to errors"
  c. If you receive this you should contact the Grants.gov Contact Center for assistance and to create a customer service record of your issue
  d. If you miss the deadline Grants.gov cannot assist you
  e. Contact the Agency Point of Contact listed on the opportunity to tell them why you missed the deadline
  f. It is at the Agency's discretion on whether to accept the application after the deadline
- **Agency Retrieval Email -** Once the Agency (ANA) retrieves your application package you will receive an e-mail stating so.

You can track your application by visiting the **Track My Application** page and entering the tracking number of up to five specific submissions or login to Grants.gov to view the status of all your submissions. The Grants.gov tracking number assigned to your submission can be found in several locations:

- Submission Confirmation Screen
- Validation
- Submission Receipt
- Agency Retrieval Email (received within 24 to 48 hours after submission)

It is important to track your submittals so that you know where your application is in the process and to be watching for emails about your application. You can enter your confirmation number here to track your application: http://www.grants.gov/web/grants/applicants/track-my-application.html

Hint: All official submittal/error emails are sent to the Authorized Organization Representative. Please assure that the Authorized Organization Representative sends you all Grants.gov emails they may receive the day of submission of your application.

Emails from Grants.gov may have questions regarding errors or other items. If you do not respond timely to questions regarding your application it may be rejected.

Grants.gov Contact Center

- Support available 24/7 (closed on federal holidays)
- Website http://www.grants.gov/web/grants/support.html
- Email: support@grants.gov
- Toll-Free Phone Number: **1-800-518-4726**

Additional Resources

- Tools and Tips
  http://www.grants.gov/web/grants/applicants/applicant-tools-and-tips.html
- Animated Tutorials
  https://www.youtube.com/playlist?list=PLNSNGxQE7NWlPcYxVJsglJbRc6cPcfC8X
- FAQs
  http://www.grants.gov/web/grants/applicants/applicant-faqs.html

Application Review Process

Now that you've submitted your application through Grants.gov before the deadline, it will be reviewed by ANA for eligibility as per Section III.3 of the FOA. Applications passing these requirements will then be moved onto the Competitive Review Process.

Competitive Review Process

Each year ANA convenes panel review sessions in an effort to objectively review, score, and rank eligible applications. Applications competing for financial assistance from ANA are reviewed and evaluated by objective review panels using the criteria described in the ANA FOA Section V.1. Evaluation Criteria.

ANA describes an Objective Review as follows:

- A process involving the thorough and consistent examination of applications based on an unbiased evaluation on the merit of the application;
- An advisory review of applications conducted by a minimum of three unbiased reviewers;
- Essential to ensure the selection of applications that best meet the needs of the program consistent with established criteria; and
- Assurance to the public of an impartial and fair evaluation and selection process.

Panel of Reviewers

ANA recruits professionals (peer panel reviewers and subject matter experts) who possess experience and qualifications relevant to ANA program areas to serve as panel reviewers and facilitators. Panel reviewers analyze, score and comment on ANA grant applications.

Panel facilitators work with a team of panel reviewers to facilitate discussion and consolidate comments. The facilitator does not score applications. Generally, review panels are composed of three panel reviewers and one facilitator. The panels are made up of experts with knowledge and experience in the area under review.

Analysis Score and Comments

Panel reviewers and facilitators are assigned five to ten applications per review session. For two weeks prior to the panel review session, panel members read the applications, take notes, score and comment on them. During panel review week they participate in analytical discussions, critical thinking, and writing while working with the other panel reviewers and the facilitator to develop a comprehensive panel summary report that summarizes the scores and comments of the panel.

ANA Internal Review

In addition to the scores and ranking that the panel review process generates, your application will be further scrutinized by the ACF and ANA based on eligibility requirements, funding considerations, availability of funds, and, sometimes, even if you pass all of that, your project might be approved but not funded. The scores provided by the panel reviewers determine where your application scores in the funding range but the application score alone does not determine if you will be funded.

There are several disqualification factors that will result in your application being deemed non-responsive and ineligible for competitive review or funding. Please make sure to review these disqualification factors, as well as a listing of activities which are ineligible for funding under Section III.3 Other of the current Funding Opportunity Announcement.

ANA also has Administrative Policies that inform applicants what it will consider, in addition to the evaluation criteria, when making funding decisions. These are listed in the FOA under *Administrative Policies* in Section I. Please refer to Section I of the current FOA prior to submitting your application.

Availability of Funds

Grant awards are made based on the availability of appropriated funds, and may be awarded in amounts in excess of or less than the amount requested or under such circumstances as may be deemed to be in the best interest of the Federal Government. Applicants may be required to reduce or modify the scope of projects based on the amount of the approved award.

Review Comments and Scores

A summary report of application strengths and weaknesses is provided to unsuccessful applicants so that they can understand the basis of the score provided and how to strengthen the application for possible re-submittal during the next competition.

Unfunded Application Technical Assistance

ANA Training and Technical Assistance Providers reach out to unsuccessful applicants and are able to provide a comprehensive review of the application and reviewer comments and guidance in strengthening the application.

Submitting the Application the Following Year

Applicants are encouraged to re-apply for ANA funding during the next funding cycle after making appropriate revisions to the application. Many applicants who have taken advantage of technical assistance and made revisions to the applications have succeeded in obtaining higher scores, some in the funding range, in the following year's competition.

Requests for Information

ANA staff cannot respond to requests for information regarding funding decisions prior to the official applicant notification. Once official notification is provided, ANA will post information on the funded grantees on the ANA website.

Conclusion

ANA's mission is to help create healthy and economically self-sufficient communities that preserve their culture and native languages and protect natural resources and the environment.

While ANA funding is competitive, ANA offers a variety of training and technical assistance to help your community achieve its goals. Once you have identified a project that will help you address the problems, ANA Training and Technical Assistance Providers can help you develop an application for ANA funding consideration. In addition to the training provided in this workshop, ANA Training and Technical Assistance Providers are available to review the application and provide guidance and recommendations prior to submitting the application. After you have developed at least 75% of your application, you can contact your technical assistance provider for a review of the proposal. Information for the regional training and technical assistance centers can be found on the ANA website at: http://acf.hhs.gov/ana.

Thank you for your interest in ANA. ANA wants to support successful community projects. Please take the time to think about your community goals and how community development projects can help reach those goals.

Appendix A: Sample Narrative for Mock Panel Review Activity

NEED FOR ASSISTANCE

Problem Statement:
The problem that this project addresses is our community's high unemployment rate. It is clear that our community members are suffering economically as a result of unemployment and we believe that many of the other problems that our community members experience (poverty, broken and single parent families, overcrowded and substandard housing, drug and alcohol abuse, domestic violence) are caused by unemployment.

Information that Supports the Problem Statement:

The Plains Indian Center conducted a comprehensive survey to determine problems impacting community members in 2014. We received 573 returns on the survey. (See Community Survey and Planning-Attachment A) According to the results of that survey, the current unemployment rate in our community is 53%. The survey also documented a household poverty rate of 41% in our community. The problem of unemployment is a long-standing condition in the Plains Native community.

The 1268 community members who participated in a 2013 survey (See Community Survey and Planning-Attachment A) that resulted in our Plains Indian Community Comprehensive Plan identified the following problems as priorities in our community:

1. Poverty;
2. Unemployment;
3. Broken and single parent families;
4. Overcrowded and substandard housing.

Chronic problems in the Plains Indian community documented by Plains Indian Center program offices include high unemployment, poverty, minimal employment opportunities because businesses have not located on the community, drug and alcohol abuse, domestic violence and high crime rates. Nearly 40% of our youth drop out of school, often in the transition to or during high school. One out of 20 Plains Indian Community teenagers will attempt suicide. Our teen pregnancy rate is 23%.

Of the 259 households with children in the community, 185 are single parent families. Nearly all of these families have incomes at or below the poverty level.

Challenges: The Plains Indian Center has limited ability to deal with these chronic community problems. Our organizational capacity is not large or comprehensive enough to finance and operate programs that would reduce or eliminate these problems. Plains Indian Center's ability to create any initiatives that secure employment for community members, increase household incomes and help stabilize our communities also is limited. Consequently we are focusing this application on building our capacity to effectively address the problem of unemployment that impacts our community and creates a high degree of instability in our community.

Community to be Served: The project beneficiaries are unemployed members of the Plains Indian community. The Plains Indian Center is located in Plains, Kansas. The Center is located on the north side of town and is the location where the project will be implemented. Two thirds of the Native community lives on the north side of town while the rest are scattered throughout the city. The facility is owned wholly by the Center and is close to the city bus lines and the native population for easy access. Plains Kansas has a population of approximately 30,000 people with over 3,500 or 13% of those consisting of American Indians from various tribes within the state. There is however, a significant number (15%) of transient Indian people who move back and forth between their reservation and Plains.

Appendix B: Successful Project Strategies and Common Challenges

It is helpful to learn from the experiences of former ANA Grantees. ANA gathers this data for provides this brief list of Best Practice suggestions and the most common Challenges.

The seven most frequent best practice suggestions from grantees are:

1. Form Partnerships and Collaborations;
2. Ensure Community Support Throughout;
3. Market / Share Project Successes with Community;
4. Project Activities Should Be Culturally Appropriate;
5. Project / Staff Flexibility is Key;
6. Hire Motivated and Competent Staff; and
7. Have Organized / Standardized Record-keeping.

All projects encounter challenges. During the impact visits, grantees are asked to list and discuss the challenges encountered during implementation. The eleven most common challenges reported by the grantees are:

1. Staff turnover;
2. Late start;
3. Overambitious project scope;
4. Geographic isolation and travel related issues;
5. Lack of expertise;
6. Challenges with ANA processes;
7. Underestimated project cost;
8. Underestimated personnel needs;
9. Partnership fell through;
10. Lack of community support during implementation; and
11. Hiring delays.

Appendix C: Cost Principles: Selected Items of Cost

The next two pages provides a graphic of the allowability of selected elements of cost detailed in the regulations. It is important to read the specific requirements located in sections 75.421 through 75.475 of CFR 45 if you have questions about specific costs.

	Allowable	Prior Approval Required	Not Allowable
Advertising and Public Relations - Read Regulations			
Advisory Councils - *read the regulations*			
Alcohol Beverages			X
Alumni/ae Activities			X
Audit Services	X (with restrictions)		
Bad Debts			X
Bonding Costs	X		
Collections of Improper Payments	X		
Commencement and Convocation Costs			X (with exception)
Compensation - Personal Services - *read the regulations*	X		
Compensation - Fringe Benefits	X		
Conferences	X		
Contributions and Donations - *read allowability of contributions to the Tribe or organization*			X
Defense and Prosecution of Criminal and Civil Proceedings, Claims, Appeals and Patent Infringements - *some exceptions*			X
Depreciation	X		
Employee Health and Welfare Costs	X		
Entertainment Costs			X
Equipment and Other Capital Expenditures		X	
Exchange Rates		X	
Fines, Penalties, Damages and Other Settlements - *some exceptions*			X

	Allowable	Prior Approval Required	Not Allowable
Fund Raising and Investment Management Costs		X - If to meet Federal program objectives	
Gains and Losses on Disposition of Depreciable Assets - *read the regulations*			
General Costs of Government			X
Goods or Services for Personal Use			X
Idle Facilities and Idle Capacity			X - two exceptions
Insurance and Indemnification	X		
Intellectual Property	X		
Interest - *read the regulations*			
Lobbying			X
Losses on Other Awards or Contracts			X
Maintenance and Repair Costs	X		
Materials and Supplies Costs, including Costs of Computing Devices	X		
Organization Costs		X	
Proposal Costs	X		
Publication and Printing Costs	X		
Rearrangement and Reconversion Costs - *read the regulations*		X	
Recruiting Costs	X		
Relocation Costs of Employees	X - based on specific criteria		
Rental Costs of Real Property and Equipment - *read the regulations*	X		
Selling and Marketing - direct costs only		X	
Specialized Service Facilities	X -specific conditions		
Student Activity Costs			X
Taxes	X		
Termination Costs	X		

	Allowable	Prior Approval Required	Not Allowable
Training and Education Costs	X		
Transportation Costs	X		
Travel Costs - *read the regulations*	X		
Trustees Travel and Subsistence Costs	X		

Appendix D: Summary of CFR 45 Part 75

The Department of Health and Human Services adoption of the Office of Management and Budget Guidance in 2 CFR Part 200 has been codified into 45 CFR Part 75. The objective of the 2 CFR Part 200 reform is to reduce both administrative burden and risk of waste, fraud and abuse.

The purpose of the Federal financial management regulations is to ensure that government funds are used by governments and organizations efficiently and effectively to provide the services and/or goods authorized by the Federal agency that awarded the funds. They also ensure that the governments and organizations financial management systems provide accurate, reliable, and timely financial information to the Federal government.

On December 26, 2013 the Office of Management and Budget (OMB) issued 2 CFR Part 200 which consolidates eight OMB Circulars. On December 19, 2014 the Department of Health and Human Services has codified the regulations into 45 CFR Part 75.

The management of an Administration for Native Americans grant requires a working knowledge of the financial assistance rules and regulations and basic cost contained in 45 CFR Part 75.

Below is a summary of 45 CFR Part 75. It is important that the full regulations be referenced for information about each of the areas covered by the regulations.

The circular is organized as follows:

Part 75 – Subpart A:	Acronyms and Definitions
Part 75 – Subpart B:	General Provisions
Part 75 – Subpart C:	Pre-Federal Award Requirements and Contents of Federal Awards
Part 75 – Subpart D:	Post Federal Award Requirements
Part 75 – Subpart E:	Cost Principles
Part 75 – Subpart F:	Audit Requirements

45 CFR Part 75 – Subpart A – Acronyms and Definitions

Combines the definitions from the administrative requirements and cost principles circulars into a single list. In addition to the definitions detailed in 2 CFR Part 200, HHS has added definitions for awardee, commercial organization, departmental appeals board, excess property, expenditure report, grantee, HHS awarding agency, and principal investigator/program director. Several of the key terms include:

- Fixed Amount Awards. Is a type of grant agreement under which the Federal awarding agency or pass-through entity provides a specific level of support without regard to actuals costs incurred under the Federal award.
- Micro-purchase.   A purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold.
- Performance Goal. A target level of performance expressed as a tangible, measurable objective, against which actual achievement can be compared, including a goal expressed as a quantitative standard, value, or rate.
- Protected Personally Identifiable Information. An individual's first name or first initial and last name in combination with any one or more of types of information, including, but not limited to, social security number, passport number, credit card numbers, clearances, bank numbers, biometrics, date and place of birth, mother's maiden name, criminal, medical and financial records, educational transcripts.

45 CFR Part 75 – Subpart B – General Provisions

Establishes the uniform administrative requirements, cost principles and audit requirements for Federal awards to non-Federal entities.

It explains that in circumstances where the provisions of Federal statues or regulations differ the Federal statutes or regulations govern and specifically references the Indian Self-Determination and Education and Assistance Act.

States the specific programs that the cost principles do not apply to.

It does allow for exceptions in 75.102 if recommended by the Federal agency and approved by OMB.

The effective date for full implementation will be awards issued after December 26, 2014 and audits of fiscal years beginning on or after December 26, 2014.

Non-Federal agencies must disclose in writing any potential conflicts of interest. Also all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award.

45 CFR Part 75 – Subpart C - Pre-Federal Award Requirements and Contents of Federal Awards

75.201 Use of Grant Agreements, Cooperative Agreements, and Contracts

Information on the award instrument which includes grant agreements, cooperative agreement, or contracts. It also allows for fixed amount awards. The Federal agency will determine the appropriate instrument.

75.202 Requirement to Provide Public Notice of Federal Financial Assistance Programs

Requires the Federal awarding agency to notify the public of Federal programs in the Catalog of Federal Domestic Assistance. Specific information must be provided to GSA about the Federal program.

75.203 Notices of Funding Opportunities

Requires a public notice of funding opportunities for competitive grants and cooperative agreements.

75.204 Federal Awarding Agency Review of Merit Proposals

Requires the Federal awarding agency to design and execute a merit review process for applications for competitive grants or cooperative agreements.

75.205 Federal Awarding Agency Review of Risk Posed by Applicants

Requires the Federal awarding agency to conduct a review of risk posed by applicants. The Federal agency may use a risk-based approach and may consider any items such as:

- Financial stability;
- Quality of management systems and ability to meet the management standards;
- History of performance;

- Reports and findings from audits; and
- Applicant's ability to effectively implement statutory, regulatory, or other requirements.

75.206 Standard Application Requirements

Including forms for applying for HHS financial assistance, and state plans.

75.207 Specific Award Conditions

Provides authorization to impose specific award conditions as needed for applicants with a history of failure to comply with terms and conditions of a Federal award, fails to meet expected performance goals, or otherwise not responsible.

75.211: Public Access to Federal Award Information

Implements the statutory requirement for Federal spending transparency which requires the Federal awarding agency to announce all Federal awards publicly and publish on the OMB designated website. Currently www.USAspending.gov

75.212 Suspension and Debarment

75.217 Participation by Faith-Based Organizations

The funds must be administered in compliance with the standards in 45 CFR Part 87.

45 CFR Part 75 – Subpart D – Post Award Requirements

75.301: Performance Measurement

The Federal awarding agency must require the recipient to relate financial data to performance accomplishments of the Federal award.

When applicable, recipients must also provide cost information to demonstrate cost effective practices.

The recipient's performance should be measured in a way that will help the Federal awarding agency and other non-Federal entities to improve program outcomes, share lessons learned, and spread the adoption of promising practices.

75.302: Financial Management

The financial management system must provide for:

- Retention, methods of transfer, transmission and storage of information.
- Identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received.
- Accurate, current, and complete disclosure of financial results of each Federal award or program.
- Records that identify adequately the source and application of funds.
- Effective control over, and accountability for, all funds, property, and other assets.
- Comparison of expenditures with budget amounts.
- Written procedures to implement the payment requirements.
- Written procedures for determining the allowability of costs in accordance with the cost principles.

75.303: Internal Controls

The non-Federal entity must establish and maintain effective internal control over the Federal award which is in compliance with guidance in "Standards for Internal Control in the Federal Government".

75.305: Payments

Payments must minimize the time elapsing between the transfer of funds from the Federal government and the disbursement of funds.

Payments must be paid in advance, provided the non-Federal entity maintains written procedures that minimize the time elapsing between the transfer of funds and disbursement and systems that meet the standards for fund control and accountability.

Reimbursement is the preferred method when the requirements cannot be met.

If the non-Federal entity does not meet standards but cannot operate without an advance a working capital advance may be made available.

Rebates, refunds, contract settlements, audit recoveries, and interest must be used first before requesting an advance.

All advances must be placed in an interest bearing account unless the non-Federal entity receives less than $120,000 in Federal awards, interest earned would not exceed $500 per year, depository requires a high average or minimum balance, or a foreign government or banking system prohibits or precludes interest bearing accounts.

The first $500 of interest earned may be retained for administrative expenses.

75.306 Cost Sharing or Matching

Cost sharing or matching must meet the following requirements:

- Verifiable from the non-Federal entity's records,
- Not included as contributions for any other Federal award,
- Necessary and reasonable for accomplishment of project objectives,
- Allowable under the cost principles,
- Not paid by the Federal government under another Federal award, except where the Federal statute authorizes use of funds for cost sharing or matching,
- Provided for in the approved budget

The regulations contain additional information on the valuation of donated services, property, indirect costs, land, and equipment.

75.307 Program Income

Program income is defined as gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance.

Proceeds from the sale of real property or equipment are not program income; such proceeds will be handled in accordance with the post federal award requirements.

There are three methods for treatment of program income:

- Deduction
- Addition
- Cost sharing or matching

The HHS Grants Policy Statement goes into further detail on the use of program income alternatives in Exhibit 7.

Table 1: Use of Program Income Alternatives

Alternative	Use of program income
Additive	**Added to funds committed to the project or program and used to further eligible project or program objectives**
Deductive	**Deducted from total allowable costs of the project or program to determine the net allowable costs on which the Federal share of costs will be based**
Matching	**Used to satisfy all or part of the non-Federal share of a project or program**
Combination	**Uses all program income up to (and including) $25,000 as specified under the additive alternative and any amount of program income exceeding $25,000 under the deductive alternative**

If the Federal award does not specify in its regulations or terms and conditions of the Federal award, the program income will be deduction.

Note: ANA always uses the addition method for program income.

For Institutions of Higher Education or non-profit research institutions if not specified the program income will be addition.

If addition or cost sharing or matching methods are authorized any program income in excess of any amounts specified must also be deducted from expenditures.

There are no Federal requirements governing the disposition of income earned after the end of the period of performance for the Federal award unless the Federal awarding agency regulations or the terms and conditions of the Federal award provide otherwise.

75.308 Revision of Budget and Program Plans

The budget must be related to performance for program evaluation purposes when appropriate. For non-construction Federal awards, recipients must request prior approvals for the following:

- Change in the scope or the objective of the project
- Change in key personnel

- Disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project by the approved project director or principal investigator
- Costs requiring prior approval as defined in the cost principles
- Transfer of funds budgeted for participant support costs. Participant support costs are defined as direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees in connection with conferences, or training projects.
- Transfer or contracting out of any work under the Federal award unless described in the application and funded in the approved Federal award. This does not apply to acquisition of supplies, material, equipment or general support services
- Changes in the amount of approved cost-sharing or matching
- A fixed amount sub-award as described in 75.353
- The recipient wishes to dispose of, replace, or encumber title to real property, equipment, or intangible property that was acquired or improved with a Federal award
- Federal awarding agencies may waive certain prior approvals
- Incur costs 90 days prior to award
- Initiate a one-time extension of the period of performance by up to 12 months
- Carry forward unobligated balances to subsequent periods of performance
- The HHS awarding agency may, at its option, restrict the transfer of funds among direct cost categories or programs, functions and activities if the amount exceeds $150,000 or 10% of the total budget amount (ACF uses 25% instead of 10% for the ceiling for transfers)
- The need for additional funds

75.309 Period of Performance. Costs may be charged only during the period of performance or 90 days prior to the period of performance if authorized by the Federal awarding agency.

75.310 Insurance. Must be the equivalent of coverage as provided to property owned by the non-Federal entity.

75.316 Real Property. Will be used for the originally authorized purpose. When no longer needed must secure disposition instructions from the Federal awarding agency.

75.319 Federally-owned and exempt property

75.320 Equipment. Title will vest with the non-Federal entity.

- Equipment must be used by the non-Federal entity in the program or project for which it was acquired as long as needed.
- When no longer needed by project or program it can be used in the following ways:
  - Activities under Federal award from the Federal awarding agency which funded the original project,
  - Activities under Federal awards from other Federal awarding agencies
- The non-Federal entity must make the equipment available for use on other projects or programs provided that such use does not interfere with the work on the projects or program for which it was originally acquired.
- Equipment cannot be used to provide services for a fee that is less than private companies charge for equivalent services
- When acquiring replacement equipment, the non-Federal entity may use the equipment to be replaced as a trade-in
- There must be written procedures for managing and maintenance equipment
- Property records must include the following:
  - Description of property
  - Serial number
  - Source of funding
  - Who holds title
  - Acquisition date
  - Acquisition cost
  - Percentage of Federal participation
  - Location
  - Use and condition

- Ultimate disposition

- A control system must be developed to safeguard the equipment
- Disposition of equipment:
  - Equipment with a current fair market value of $5,000 or less may be retained, sold or otherwise disposed of with no further obligations to the Federal awarding agency
  - Equipment with a fair market value of $5,000 or more the non-Federal agency must secure disposition instructions. If instructions are not received in 120 days the regulations detail how to handle the disposition

75.321 Supplies

Title to supplies upon acquisition vest with the non-Federal entity upon acquisition. If the residual inventory of unused supplies exceeds $5,000 upon completion or termination of project and not needed for other Federal awards, the non-Federal entity must compensate the Federal government for its share.

If the Federal government retains an interest in the supplies, they cannot be used to provide services for a fee that is less than private companies charge for equivalent services.

75.322 Intangible Property.

Intangible property is defined as property having no physical existence, such as trademarks, copyrights, patents and patent applications and property, such as loans, notes and other debt instruments, lease agreements, stock and other instruments of property ownership.

Title to intangible property acquired under a Federal award vests upon acquisition in the non-Federal entity.

There are a number of conditions about use, please read the regulations if applicable.

PROCUREMENT STANDARDS

75.327 General Procurement Standards.

- Non-Federal entity must use its own documented procurement procedures

- Must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders
- Must maintain written standards of conduct covering conflicts of interest and governing the performance of its employees engaged in the selection, award and administration of contracts
- Must maintain written standards of conduct covering organizational conflicts of interest
- Procedures must avoid acquisition of unnecessary or duplicative items
- Non-Federal entity is encouraged to enter into state and local intergovernmental agreements or inter-entity agreements where applicable
- Encouraged to use Federal excess and surplus property
- Encouraged to use value engineering clauses in contracts for construction projects
- Must award contracts only to responsible contractors possessing the ability to perform successfully
- Must maintain records sufficient to detail the history of the procurement
- Can only use time and materials contracts if no other contract is suitable

75.326 Competition. All procurement transactions must be conducted in a manner providing full and open competition.

75.329 Methods of Procurement to be followed

- Micro-Purchases. Micro-purchase is the purchase of supplies which do not exceed $3,500 in the aggregate. They may be awarded without soliciting competitive quotations if the price is reasonable.
- Small Purchase Procedures. Small purchase procedures cannot exceed the Federal Simplified Acquisition Threshold. Price or rate quotations must be obtained from an adequate number of qualified sources. The Federal Simplified Acquisition Threshold is $150,000.
- Sealed Bids. The following conditions must exist for sealed bids to be feasible:
  - A complete, adequate, and realistic specification is available

- Two or more responsible bidders are able to compete
- The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price

The following requirements apply:

- The invitation for bids (IFB) will be publicly advertised and solicited from an adequate number of suppliers
- The IFB will include any specifications and pertinent attachments
- All bids will be publicly opened
- A firm fixed price contract will be made in writing to the lowest responsive and responsible bidder
- Any or all bids may be rejected for documented reason

- Competitive Proposals. Competitive proposals are used when conditions are not appropriate for the use of sealed bids. The following conditions apply:
  - Must be publicized and identify all evaluation factors and their relative importance
  - Solicited from an adequate number of qualified sources
  - Must have a written method for conducting technical evaluations and selecting recipients
  - Awarded to the firm whose proposal is most advantageous to the program, with price and other factors considered
- Non-Competitive Proposals. Solicitation through only one source. May be used only when the following circumstances apply:
  - Item is available only from a single source
  - Public exigency or emergency will not permit a delay
  - Authorized by the funder
  - After solicitation of a number of sources, competition is determined inadequate

75.330 Contracting with Small and Minority Businesses, Women’s Business Enterprises, and Labor Surplus Area Firms.

The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women’s business enterprises, and labor surplus area firms are used when possible.

75.331 Procurement of Recovered Materials

Procuring only items designated in guidelines of the Environmental Protection Act that contain the highest percentage of recovered materials practicable.

75.332 Contract Cost and Price.

The non-Federal entity must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold.

75.333 Federal Awarding Agency or Pass-Through Entity Review

The non-Federal entity must make available upon request procurement documents when requested or when:

- The procurement procedures or operations fails to comply with procurement standards
- Is to be awarded without competition
- Specifies a “brand name”
- Is awarded to other than the apparent low bidder under a sealed bid procurement
- A proposed modification changes the scope of the contract amount

The non-Federal entity may request that its procurement system be reviewed by the Federal awarding agency or the non-Federal entity may self-certify its procurement system.

75.334 Bonding

75.341 Financial Reporting.

The current OMB financial report is the Federal Financial Report or the SF-425. The report can be required no less frequently than annually and no more frequently than quarterly without OMB approval.

75.342 Monitoring and Reporting Program Performance

The non-Federal entity is responsible for oversight of the operations of the Federal award supported activities to assure compliance with requirements and performance expectations are being achieved. This must cover each activity.

The performance reports must have OMB approval. Performance reports will be required no less frequently than annually and no more frequently than quarterly without OMB approval. Annual reports will be due 90 calendar days after the reporting period and quarterly or semiannual reports will be due 30 calendar days after the reporting period.

75.343 Reporting on Real Property

75.352 Requirements for Pass-Through Entities

75.353 Fixed Amount Sub awards

75.361 Retention Requirements for Records

All records and supporting documents must be retained for three years from the date of submission of the final expenditure report or for awards that are renewed quarterly or annually from the date of the submission of the quarterly or annual financial report.

If any litigation, claim, or audit is started before the expiration of the three year period the records must be retained until resolved. Also if the awarding agency notifies the non-Federal entity in writing to retain records.

Property and equipment records must be retained for three years after final disposition.

75.363 There are a number of requirements for records collection, transmission, and storage. Also access to records in 75.364

75.371 Remedies for Noncompliance

A non-Federal entity that fails to comply with Federal statutes, regulations, or the terms and conditions, the HHS awarding agency or pass-through entity may impose additional conditions.

75.339 Termination

75.343 Closeout

45 CFR Part 75 – Subpart E – Cost Principles

75.401 Application

The principles must be used in determining the allowable costs of work performed by the non-Federal entity under Federal awards.

75.402 Composition of Costs

The total cost of a Federal award is the sum of the allowable direct and indirect costs.

75.403 Factors Affecting Allowability of Costs

- Must be necessary and reasonable
- Conform to any limitations or exclusions in the cost principles or the federal award
- Be consistent with policies and procedures
- Be accorded consistent treatment
- Be determined in accordance with generally accepted accounting principles
- Not included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program
- Be adequately documented

The regulations also address direct and indirect costs and cost allocation plans. 75.416 speaks to special considerations for States, Local Governments and Indian Tribes and discusses cost allocation plans and indirect cost proposals.

45 CFR Part 75 – Subpart F – Audit Requirements

75.501 Audit Requirements

A non-Federal entity that expends $750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program specific audit conducted for that year.

75.504 Frequency of Audits

Audits required by this part must be conducted annually with the following exceptions:

An Indian tribe that is required by constitution or statute, in effect on January 1, 1987, to undergo its audits less frequently than annually, is permitted to undergo its audits pursuant to this Part biennially.

Any nonprofit organization that had biennial audits for all biennial periods ending between July 1, 1992 and January 1, 1995 is permitted to undergo its audits pursuant to this Part biennially.

75.512 Report Submission

The audit must be completed and the required data collection form and reporting package must be submitted within the earlier of 30 calendar days after receipt of the auditor’s report or nine months after the end of the audit period.

Appendix I:	Full Text of Notice of Funding Opportunity
Appendix II:	Required Contract Provisions
Appendix III:	Indirect Cost Institutions of Higher Education
Appendix IV:	Indirect Cost Nonprofit Organizations
Appendix V:	Government Entities Cost Allocation Plans
Appendix VI:	Public Assistance Cost Allocation Plans
Appendix VII:	Indirect Cost for Government Entities
Appendix VIII:	Nonprofit Organizations exempted from Cost Principles
Appendix IX:	Hospital Cost Principles
Appendix X:	Data Collection Form
Appendix XI:	Compliance Supplement

Note: The management of an ANA grant requires a working knowledge of the financial assistance rules and regulations and basic cost principles of HHS. HHS rules and regulations are contained in Title 45 of the Code of Federal Regulations (45 CFR). More detailed information on how HHS implements the CFRs is in the Grants Policy Statement (currently under revision), available at: http://www.acf.hhs.gov/grants-forms in the middle of the page under Certifications.

ANA

ADMINISTRATION FOR
NATIVE AMERICANS

ANA Contact Information

Toll Free Phone: 1-877-922-9262

E-mail: anacomments@acf.hhs.gov

Administration for Native Americans
Mary E. Switzer Memorial Building
330 C Street, SW
Room 4126
Washington, DC 20416

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