

Corporation for National and Community Service

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Effective Date: July 18, 2018

Subject: Communicating with Applicants, Potential Applicants, and Current Grantees during Grant Application Review Process (GARP)

Purpose: Maintain the integrity of the CNCS grant application review and selection process and ensure consistency in staff communication with grantees, applicants, and potential applicants during GARP.

Who is Covered: All CNCS staff, in particular, staff who participate in GARP for grant competitions, including program directors and senior managers.

Policies Replaced: This policy supersedes Policy OGPO-2012-01 and the guidance issued jointly by Robert Velasco II, as the Acting Chief of Program Operations, and Wilsie Y. Minor, Acting General Counsel, on February 18, 2011, entitled “Communicating with Grantees and Applicants during the Grant Application Review Process (GARP).”

Originating Office: Office of Grants Policy and Operations

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What is the purpose of this policy?

The purpose of this policy is to maintain the integrity of the CNCS grant application review and selection process by ensuring and establishing guidelines for all staff communications with applicants, potential applicants, and current grantees during the Grant Application Review Process (GARP) for competitive grant-making processes.

What is the scope of this policy?

For the purpose of this policy, the scope of GARP refers to the comprehensive process that commences with publishing a Notice of Funding Opportunity (Notice), followed by outreach, application submission, application review, and making and announcing funding decisions.

This policy covers all CNCS grant competitions that result in new or re-competing grant awards, including cooperative agreements.

This policy does not apply to non-competitive grant awards such as formula, continuations, amendments, AmeriCorps VISTA program and support grants, Senior Corps non-competitive new and renewal, augmentation, memoranda of understanding or agreements, and AmeriCorps NCCC sponsor agreements or contracts.

To whom does this policy apply?

This policy applies to all CNCS staff, including program directors, managers, and the Office of the CEO, and in particular, those staff who participate in GARP for competitive grant-making processes.

All CNCS staff communicating with applicants, potential applicants, and current grantees must comply with this policy. Violation of this policy may result in appropriate disciplinary actions.

The Office of General Counsel (OGC) and the Office of Grants Policy and Operations (OGPO) provide guidance about this policy. Other offices may be consulted as needed.

What is the rationale for this policy?

External stakeholders could receive or be perceived as receiving an unfair advantage if staff discuss application status and content prior to award. If staff answer questions or otherwise communicate directly with an applicant about their application, follow-up questioning and even legal challenges could occur. These questions and challenges could impede or halt the timely execution of GARP.

How is staff communication with existing grantees handled?

During GARP for a given competition, CNCS staff will continue to support, manage, and monitor current grants in accordance with all applicable laws and regulations. Staff who conduct check-ins with current grantees (via in-person or phone conversations) or conduct monitoring visits may continue to do so during GARP. Communications should focus on existing grantee content and provide the standard level of support. Communications with existing grantees must

follow the provisions established in this policy with regard to an open grant competition, in particular the section “What communication is not allowed?”

For all programs covered by this policy, if grantees request in-person meetings during GARP, CNCS staff may meet with them so long as there is no discussion of the status or content of pending new or re-competing applications.

What communications are allowed with all applicants and potential applicants?

CNCS staff may provide the following information to applicants in order to make the application process accessible and to support applicants through the submission process:

- The Notice and Application Guidance: published on Grants.gov and the [CNCS Funding Opportunities](#) webpage in a 508 compliant format
- Training and technical assistance: publicly announced and provided to potential applicants via conference calls and recordings prior to the application deadline
- Frequently Asked Questions (FAQs): published for most competitions and updated throughout the period the Notice is open to the public
- Supplemental resources for applicants: materials published on the CNCS website that provide applicants with supplemental information regarding the program and its application
- Point of contact: dedicated email address for each competition publicly announced in the Notice; a dedicated voicemail number may also be provided
- eGrants NOFA: announced when it is open to the public for electronic application submission
- National Service Hotline: contact information and business hours are shared with applicants to provide them support for submission of their applications via eGrants
- Press Releases: distributed as part of each Notice outreach/communication plan
- Grant competition posting material: published by CNCS on the [CNCS Results of Grant Competitions](#) webpage after all awards have been made for a grant competition

These communications are permitted in order to ensure that all applicants have access to the same information. Staff are allowed to discuss information that is publicly available but must refer applicants to relevant official written materials whenever possible.

During GARP, CNCS staff, specifically program staff, play a key role in Notice outreach and training, and technical assistance activities. Outreach is conducted equally to all types of eligible organizations.

Staff may explain to a prospective applicant the content and requirements of the published Notice. Staff may conduct outreach, provide guidance or assistance to potential, new, re-competing, and continuation applicants via a variety of methods such as: calls, webinars, presentations, in-person consultations, and written materials. In these interactions with prospective applicants, CNCS staff must ensure that participants are not given information that would provide them an unfair advantage in the competition. Any questions that are asked and answered which may be relevant to other prospective applicants should be shared with the public via FAQs posted online or through other means of distribution.

OGC clearance is not required to explain the Notice to applicants, however, the person or office planning to conduct a meeting should consult with OGC prior to the meeting, particularly in the

case of high-profile meetings involving program directors, the CEO, and/or other senior managers.

Staff may conduct training and technical assistance calls prior to the application deadline to review application guidance, content and requirements of the Notice, and CNCS policies applicable to the specific competition. New questions that arise from such calls, and answers given in response to those questions, should be made available to the public by revising and reposting the FAQs. As appropriate, responses to questions from emails and mailboxes will be added to the FAQs, and must be cleared by OGC and OGPO within two business days of receipt prior to posting the response to the public. Responses to inquiries must rigorously adhere to a practice of responding to all questions by referencing the Notice, the FAQs, CNCS regulations or policy, or applicable law.

What communications are allowed during Applicant Clarification?

During the Applicant Clarification process, program and/or grant staff are permitted to communicate with organizations that submitted applications approved for clarification. The purpose of Applicant Clarification is to request clarifying information from applicants on certain aspects of the application in order to assist CNCS staff in making final funding decisions. Requests during Applicant Clarification must take place in writing and followed up via phone, when applicable.

During all Applicant Clarification communications, CNCS staff must adhere to the programmatic and budgetary components identified and approved by the Program Office and/or the Office of Grants Management as needing to be clarified.

What communication is not allowed?

CNCS staff must adhere to the following policies to ensure fairness and avoid actual, potential, or perceived unfair advantages to any particular applicant during GARP:

- Do not provide applicants with substantial assistance about an open grant competition on an individual basis that will provide them with unfair advantage. For example, while extensive time spent providing programmatic technical assistance to a particular applicant may be considered substantial assistance that provides an unfair advantage, substantial technical assistance with eGrants or CNCS systems may not.
- Do not provide technical assistance to an applicant other than what is published in the Notice, has been made available to the public, or will be made available to the public via updated FAQs or other means.
- Do not review or provide comments to applicants on applications prior to the deadline.
- Do not discuss the content of an application, speak one-on-one with applicants about what should or should not be written or included in an application, provide any information concerning the assessment of an application, or provide information concerning funding for any application submitted to CNCS for a grant competition.
- Do not disclose, directly or indirectly, GARP information regarding internal decision-making, grant selection, and tentative timeline, or speak about any internal process, except what has been made available to the public, to any person other than an officer or employee of CNCS that is authorized by CNCS to receive such information. Note that in the case of

competitions resulting from an interagency agreement, officers or employees of the partner agency/organization(s) that are authorized by CNCS may receive such information.

- Promptly report to the Designated Agency Ethics Official any offer of a gratuity from an applicant.

Additionally, CNCS staff, including program directors, managers, and the Office of the CEO, should not discuss with external parties any upcoming future competitions that have not yet been disclosed to the public. Staff should not discuss anything that may be included in the Notice, such as potential deadlines, requirements, selection criteria, funding priorities, etc.

Can CNCS conduct targeted outreach?

CNCS may conduct targeted outreach. Targeted outreach allows CNCS to reach out to prospective applicants in order to increase the number and quality of applications for a competition based upon underrepresented focus areas, priority populations, geographical regions, and other criteria as determined by CNCS (for example, outreach to applicants serving rural areas or to potential tribal applicants).

The program director, in consultation with OGPO and OGC, will determine whether targeted outreach is appropriate. The information provided during the targeted outreach shall be made publicly available, and will conform generally to this policy.

What are the requirements for documenting communications?

Each program is responsible for establishing a communication process to ensure that GARP related communication with applicants and potential applicants is documented. At a minimum:

- Inquiries related to a competition received via dedicated email boxes must be saved and responses to applicants provided in writing from the dedicated email boxes.
- Inquires received via social media will be forwarded to the designated email address and responded to from there.

If a program chooses to provide a dedicated voicemail number for a competition, clear and understandable inquiries should be documented. Responses in writing to voicemail inquiries should be sent using the dedicated email boxes.

What extenuating circumstances might justify an exception to the communication parameters established in this policy?

There are no predetermined exceptions to this policy. Exceptions, when and where appropriate, will be based on the facts surrounding a request for an exception and will be determined on a case-by-case basis. Before an exception is granted, concurrence by OGPO and OGC is required. The program will document the rationale for the exception and file it with OGPO as part of the grant competition official records.

How does CNCS handle invitations to its staff from applicants or potential applicants to participate in meetings, conferences, and other events during GARP?

During GARP, it is especially important to vet all invitations to senior staff to participate in meetings, conferences, and other events through OGC, particularly in cases of high-profile

meetings involving program directors, the CEO, and other senior managers. If participation is permitted, staff should not answer questions about, or discuss the status or content of pending applications, or results from the review process, or any other information about the competition that is not available to the public.

What is the communication plan for this policy?

The Policy Coordinator will inform all CNCS staff when this policy is approved and posted on the Intranet. OGPO will also disseminate this policy via its Intranet page.

This policy will be published on www.nationalservice.gov by the Associate Director of Policy. As appropriate, relevant elements of the policy must be communicated to prospective applicants during training and technical assistance calls for each grant competition, included in respective Frequently Asked Questions, and referenced in instances when an applicant or grantee may request certain information relating to a grant competition.

What is the training plan related to this policy?

As needed, OGPO will update the policy orientation session available to all CNCS staff through [LITMOS](#), in order to ensure alignment with policy revisions. This training is particularly designed for staff at all levels, including program directors and senior managers, who participate in GARP directly and/or engage in GARP-related conversations.

OGPO will reiterate key elements of this policy and make this training available to leadership and special advisors, in particular those new to the agency, when the first Notice of a fiscal year is released.

program directors for units that conduct grant competitions are responsible for ensuring that all staff who participate in GARP are appropriately trained on and familiar with this policy. Each program/unit is encouraged to coordinate with OGPO for additional training to their staff.