# PROGRAM ADMINISTRATION MANUAL (PAM)

National Resource Center (NRC) and Foreign Language and Area Studies (FLAS)



# **Table of Contents**

Introduction	4
Purpose of the Program Administrative Manual (PAM)	4
Contacts	4
Glossary of Selected Grant Terms	5
IFLE Roles and Responsibilities	9
IFLE Program Officer Responsibilities	9
Grantee Roles and Responsibilities	9
Grantee Responsibilities	9
Project Director (PD) Responsibilities	9
Consortium Project Responsibilities	10
Subawards	
International Education General Provisions: Definitions	11
Fly America Act and Open Skies Partnerships	12
Code Sharing and The Fly America Act	13
Open Skies Agreements	13
Verifying Compliance in IRIS	14
FAQ	
Grant Schedule and Continuation Awards	15
Project Period and Budget Periods	15
Continuation Awards and Risk Management	16
Continuation Awards	16
Risk Management	17
NRC and FLAS Reporting in the IRIS System	17
Interim, Annual, and Final Performance Reports	
National Resource Center Reports	18
Foreign Language and Area Studies Fellowships Reports	18
FLAS Fellows: Pre- and Post-Language Evaluations	18
Government Performance and Results Act (GPRA) of 1993 and the Government	
Performance and Results Modernization Act of 2010	
GPRA Measures	
National Resource Center GPRA Measures	
Foreign Language and Area Studies Fellowships GPRA Measures	
Performance Measure Forms (PMFs)	
National Resource Center (NRC) Grant Administration	
Grant Priorities	
Implementation of Priorities	
Absolute Priority	
Competitive Preference Priorities	
Diverse Perspectives and Areas of Need	
Allowable Activities	25

NRC Budgets	25
Drawdowns	26
Carrying Over of Unobligated Balances	28
Time Extension	28
Travel Costs	28
General	28
Allowable Expenses for Travel	28
Domestic Travel	29
International Travel	29
Car Travel	29
Travel after the End of the Grant Period	29
Travel Approval Requests (TARs)	29
Foreign Language and Area Studies (FLAS) Fellowships Administration	30
Purpose	30
Eligibility Requirements for Institutions and Students	30
Institution Eligibility	30
Student Eligibility	31
Competitive Preference Priorities	32
FLAS Competitive Preference Priority 1	32
FLAS Competitive Preference Priority 2	32
Diverse Perspectives and Areas of Need	32
Types	32
Duration	32
FLAS Fellowship Amounts	33
FLAS Student Application and Selection Process	33
Student Applications	33
Selection Process	33
Coursework to Fulfill FLAS Requirements	34
Academic Year (AY) Fellowship Requirements	34
Intensive language instruction	35
Ancient and classical languages	35
Proficiency Level Requirements	35
Grades and Credits for FLAS Courses	35
Approval of an Independent Study to Fulfill FLAS Requirements	35
Distance Education Courses and FLAS Fellowships	36
Internships During a Fellowship Period	36
Employment During a Fellowship Period	
Fellowship Definition	
Institutional Payment Limitations (Reference: 657.31 (a) (3))	
Appendix A – Sample Budget	
Appendix B – Student Abroad Handout	49

# Introduction

# Purpose of the Program Administrative Manual (PAM)

he International and Foreign Language Education (IFLE) Office of the U.S. Department of Education administers 10 discretionary grant programs authorized under the Fulbright-Hays Act of 1961 and Title VI and Title VII of the Higher Education Act (HEA) of 1965, as amended.

This Program Administration Manual (PAM) for the National Resource Centers (NRC) and the Foreign Language and Area Studies (FLAS) Fellowships programs was developed to help ensure successful project administration and fiscal accountability throughout the duration of the grant(s). Program officers and grantees share the responsibility of maintaining compliance, and we hope this manual proves useful in the process.

The Fiscal Year (FY) 2018–2021 PAM provides information on reporting requirements and schedules, Title VI program statutes, NRC and FLAS regulations, FLAS language eligibility, and many other topics. While we could not address every possible issue in this manual, we made a concerted effort to include responses to the most frequently-asked questions that will be helpful to experienced and new grantees alike.

Program officers in IFLE's Advanced Training and Research Division (ATRD) have been assigned specific world areas/regions for NRC and FLAS grants. Please feel free to contact any of the program officers listed below with questions, comments, and concerns regarding the manual or to seek additional information about the administration of your NRC and FLAS grants.

### **Contacts**

Staff	Position	World Area Assignments	Email	Phone
Cheryl Gibbs	Senior Director and Senior Program Officer	South Asia	cheryl.gibbs@ed.gov	202-453-5690
Sarah Beaton	Director		Sarah.Beaton@ed.gov	202-453-7221
Tim Duvall	Senior Program Officer	Middle East, Russia and Eastern Europe	timothy.duvall@ed.gov	202-453-7521
Carolyn Collins	Program Officer	East Asia, Latin America, Pacific Islands, Southeast Asia	carolyn.collins@ed.gov	202-453-7854
Charles Bryan Jenkins	Program Officer	Africa, Canada, International, Western Europe	charles.jenkins@ed.gov	202-453-5994
Mone't Peterson- Cox	Program Administration Assistant	Notifications about Excessive Drawdowns and FY 2022 Grant Close-out Procedures	monet.peterson- cox@ed.gov	202-453-6018

# **Glossary of Selected Grant Terms**



list of commonly used terms and acronyms in the administration of discretionary grants, including grants under the National Resource Centers Program and Foreign Language and Area Studies Fellowships Program, is below.

- <u>Administrative action</u>: A post-award administrative request by a grantee to modify the terms and conditions of the original grant. An administrative action can be monetary or non-monetary and may require prior approval from the U.S. Department of Education ("the Department").
- Administrative regulations: Regulations that implement 1) guidance in 2 Code of Federal Regulations (CFR) Part 200 of the OMB "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards," which apply to the administration of all federal grants and cooperative agreements; 2) presidential executive orders (if regulation is necessary); 3) legislation affecting all applicants for or recipients of federal grants and cooperative agreements; and 4) the Department's specific requirements for the award and management of grants.
- <u>Allowable costs</u>: Expenditures under a grant project that are specifically permitted (or not specifically prohibited) by law, regulation, or guidance. Allowable cost requirements for Department of Education grants can be found in 2 CFR, federal accounting standards, and other authoritative sources.
- Appropriations legislation: A law passed by Congress to provide a certain level of funding.
- <u>Assurances</u>: Requirements in federal laws, regulations, and executive orders that applicants/recipients agree to observe as a condition of receiving federal assistance.
- Audit finding: A conclusion about a monetary or non-monetary matter related to an auditor's
  examination of a grantee's organization, program, activity, or function. Audit findings identify
  problems with an organization's grant expenditures and/or compliance with other grant
  requirements and provide recommendations for corrective action in order to prevent their
  recurrence.
- <u>Authorizing legislation</u>: A law passed by Congress that establishes or continues, in the case of reauthorization, an activity such as a grant program.
- <u>Budget period</u>: An interval of time into which a project period is divided forbudgetary purposes, usually 12 months.
- <u>Budget revision</u>: A modification to a grantee's budget. A grantee is allowed to revise its budget by moving funds from one budget category to another without obtaining prior approval, provided that the reallocated amount does not exceed 10% of the total direct costs of the grant.
- <u>Carry over</u>: Unexpended funds from one budget period used in a subsequent budget period. Funds in a grantee's G5 account are disbursed on a "first-in/first-out" basis; therefore, carry-over funds from year one of the project period are unlikely to be available for use in yearthree.
- <u>CFDA number</u>: The identifying number for a federal financial assistance program. Each CFDA number has a two-digit prefix to identify the federal agency that administers the program (84 is the prefix for the Department), followed by a three-digit code unique to the authorized program (e.g., 84.015A National Resource Centers Program; 84.015B Foreign Language and Area Studies Fellowships Program).

- <u>Closeout</u>: Closeout means the process by which the federal awarding agency determines that the grantee has completed all grant activities supported by the federal award and has satisfied all applicable terms and conditions. The grantee is required to submit all financial, performance, and other reports as required by the terms and conditions of the grant no later than 90 calendar days after the end date of the performance period.
- Continuation award (non-competing): A grant made to a recipient following the first budget period of a multi-year project, which extends the funding for another budget period within the approved project period, contingent upon the grantee's submission of required reports, substantial progress, and a determination that continuation funding is in the best interest of the Federal government.
- <u>Direct costs</u>: Costs in a grant project that are identified specifically as part of a particular activity
  or cost objective. Examples of direct costs include compensation of employees for time devoted
  to the performance of grant activities; cost of materials acquired, consumed, or expended
  specifically for the purpose of the grant; and travel expenses incurred specifically to carry out the
  activities of the project.
- <u>ED</u>: The acronym for the U.S. Department of Education (not DOE).
- Education Department General Administrative Regulations (EDGAR): Administrative regulations governing the Department's grant and cooperative agreement programs found in Title 34 of the CFR.
- Excessive drawdown: An excessive drawdown occurs when a grantee makes a drawdown in excess of its immediate cash needs. The Department's Office of the Chief Financial Officer and IFLE program officers monitor grantee accounts in G5 to determine instances of excessive drawdowns using the following thresholds:
  - o First quarter: more than 50 percent of the funds for the budget period have been drawn down by the end of this quarter;
  - O Second quarter: more than 80 percent of the funds for the budget period have been drawn down by the end of this quarter;
  - o Third quarter: 100 percent of the funds for the budget period have been drawn down by the end of this quarter. The program officer will contact the grantee immediately after the excessive drawdown is identified to inquire about the excessive drawdown and will allow the grantee fourteen days to resolve the issue. The program officer will notate the resolution of the excessive drawdown in G5 and will include all documentation in the grant official file.
  - o If a grantee's account is flagged for an excessive drawdown, your program officer will contact you to request a written explanation as to why the excessive drawdown occurred and how the issues that caused it have been resolved.
- <u>Federal Financial Report (SF-425)</u>: A standard form that grantees use to report on their grant's financial progress. Usually required at the end of the project period along with a final performance report.
- <u>Funding priorities</u>: Priorities are used to focus a grant competition on areas of current concern or emphases. Priorities may be specific activities that applicants are asked to include in an application or certain conditions that must exist for applicants to be eligible. There are Absolute Priorities, which applicants must address in order to be considered for funding; Competitive Preference Priorities, which applicants have the option of choosing whether or not to address and for which they might receive additional points or preference; and Invitational Priorities,

- which applicants are encouraged but not required to address. Invitational priorities do not have any point values. Applications that include activities that respond to invitational priorities, therefore, do not receive a competitive or absolute preference.
- Government Performance and Results Act (GPRA) of 1993: GPRA is a public law that was passed by Congress in 1993, revised by the Government Performance and Results Modernization Act of 2010 (GPRA) was enacted to improve stewardship in the Federal Government and to link resources and management decisions with program performance. GPRA requires that all federal departments (not grantees) do the following:
  - o develop a strategic plan specifying what they will accomplish over a 3- to 5-year period;
  - o set performance targets related to their strategic plan on an annual basis;
  - o report annually the degree to which the targets set in the previous year were met;
  - o conduct regular evaluations of their programs and use the results to explain their successes and failures based on the performance monitoring.
- <u>Grant Award Notification (GAN)</u>: The official document signed by a license holder stating the amount and conditions of an award for a discretionary grant or cooperative agreement (EDGAR § 75.235).
- Grantee: A non-Federal entity, e.g., institution of higher education, individual, or organization that has been awarded financial assistance under an agency's grant program in the form of a grant or cooperative agreement.
- <u>Indirect costs</u>: Costs an organization incurs for common or joint objectives that cannot be readily and specifically identified as part of a specific grant project or other institutional activity.
- <u>Indirect cost rate</u>: A percentage established by a federal agency for a grantee organization, which the grantee uses to compute the amount of grant funding (in dollars) that it uses to reimburse itself for the indirect costs of a grant project.
- <u>Indirect cost rate agreement</u>: A formalized written and signed agreement between a recipient and the cognizant federal agency that specifies the treatment of indirect costs. The agreement includes the approved rate(s), applicable fiscal year, and specific treatment of certain items. The rates and cost treatment laid out in the agreement are accepted and used by all federal agencies unless prohibited or limited by statute. Indirect cost reimbursement is limited to the grantee's actual indirect costs, as determined in its indirect cost rate agreement, or eight percent of a modified total direct cost base, whichever amount is less (EDGAR 75.562(c)(3)-(4).
- <u>Indirect cost type</u>: The program indirect cost type identifies the type of indirect cost permitted under the program (Restricted, Unrestricted, or Training).
- <u>International Resource Information System (IRIS)</u>: The web-based database and reporting system specifically designed for the International and Foreign Language Education (IFLE) office Fulbright-Hays and Title VI discretionary grant programs. IRIS is a password-protected reporting system that captures and reports annual and final performance reports from IFLE grantees. IRIS also contains publicly accessible current and historical information about the ten programs administered by IFLE.
- Monitoring: Monitoring is the regular and systematic assessment of 1) how well a grant is being implemented and achieving outcomes, 2) the degree to which it is meeting established measures, and 3) whether it is complying with statutory requirements, program regulations, polices and fiscal requirements.

- <u>Monitoring and Technical Assistance Plan</u>: A plan that provides standards and serves as a guide for monitoring and for providing technical assistance for each grant program. The plans are maintained within the IFLE office.
- Office of Management and Budget (OMB): A branch of the Executive Office of the President. OMB oversees and coordinates the administration's procurement, financial management, information collection, and regulatory policies, including grant policies and procedures.
- OMB circulars: Administrative policy documents issued by OMB that provide guidance on grant administration. Many OMB circulars were revised in 2014 and codified in Title 2, Part 200 of the Code of Federal Regulations. ("Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards").
- <u>Performance measure</u>: A quantitative indicator, statistic, or metric used to gauge program or project performance and used as a unit for measuring outcomes.
- <u>Performance report</u>: A report of the specific activities conducted by the grantee during the budget or project period.
- <u>Performance target</u>: A level of performance that a grantee seeks to meet during a project or as a result of a project.
- <u>Program regulations</u>: Regulations that implement legislation authorizing a specific grant program. Program regulations generally include applicant and participant eligibility criteria, allowable activities, and program selection criteria.
- Project period (also referred to as the performance period): The total amount of time for which the Department will fund a grant project and authorize a grantee to conduct the approved work of the project as described in the application. When the Department awards a multi-year grant, it usually obligates funds for the first budget period, and explains that funds for the subsequent budget periods are contingent upon certain conditions such as available funds and the grantee's progress towards meeting the project's objectives.
- <u>PR/Award number</u>: The identifying number for a discretionary grant. It includes the program identifier, the fiscal year for the competition, and the number assigned to the project, e.g., P015A140111, means a National Resource Centers Program grant awarded in fiscal year 18, grant number 111.
- Revised Budget: The selected applicant's budget plan that incorporates any budgetary changes and/or cost items that have been reduced or deleted during the Department's budget review and negotiation before the initial Grant Award Notification is issued.
- <u>Substantial progress</u>: A level of accomplishment that a grantee must make during a budget period in order to be considered for continuation funding. The annual performance reports should reflect evidence that the grantees' activities are consistent with the plans and objectives to which the Department and the grantee have agreed.
- <u>Supplies</u>: All tangible personal property with a unit acquisition cost less than \$5000, regardless of the length of its useful life.
- <u>Time extensions (no-cost extensions)</u>: Time extensions occur at the end of the 48-month project period. It allows the grantee additional time beyond the approved project end date (i.e., beyond August 14, 2022) to complete the approved project activities. A grantee may use grant funds during the time extension for activities that could not be conducted by the project end date. Time extension funds must not be used to conduct entirely new activities.

• <u>Uniform Administrative Regulations</u>: Regulations and requirements codified at 2 CFR, Part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards". Also referred to as "Uniform Guidance," it includes the regulations formerly covered by the Education Department General Administrative Regulations, parts 74 and 80, and supersedes and streamlines requirements from OMB Circulars A-21, A-87, A-110, A-122, A-89, A-102, and A-133, and the guidance in Circular A-50 on Single Audit follow-up.

# **IFLE Roles and Responsibilities**

# **IFLE Program Officer Responsibilities**

he primary role of IFLE program officers is to monitor project implementation and provide technical assistance to grantees regarding programmatic and fiscal management to help ensure that project goals and objectives are met successfully. IFLE responsibilities include: reviewing and approving performance reports; external evaluation reports; monitoring projects to assess compliance; responding to questions and providing guidance regarding grant management; and responding to requests such as travel approvals and administrative actions like project director changes. External outreach and project monitoring are achieved primarily through the day-to-day communication with grantees throughout the project period, and as resources allow, through virtual and on-campus site visits that provide the opportunity to interact with faculty, administrators, staff, and students, to gain insight into the impact of the funded activities.

# **Grantee Roles and Responsibilities**

# **Grantee Responsibilities**

The institution (grantee) is the legal entity accountable to the Federal Government for the use of the funds awarded. The grantee must comply with the applicable legislation and regulations for the program and must make expenditures in accordance with the program's allowable costs and the approved application. The grantee must directly supervise the administration of the project and use fiscal control and accounting procedures that ensure accountability of federal funds.



# **Project Director (PD) Responsibilities**

The following responsibilities apply when managing and administering the grant(s):

- perform the scope of work described in the approved application scope and the approved negotiated budget;
- exercise proper stewardship of federal funds;
- comply with all legislative and regulatory requirements;
- submit required performance reports that demonstrate and/or measure progress towards achievement of project goals.

The PD is responsible for communicating with the IFLE program officer to submit requests to:

- transfer funds among direct cost categories for grants in which the federal share of the project exceeds \$100,000 and the cumulative amount of transfers exceeds or is expected to exceed 10 percent of the total budget as last approved (transferred funds may not be used for purposes other than those consistent with the original intent of the project);
- change the scope or the objective(s) of the project;
- contract out any of the project activities described in the application;
- change the project director or authorized representative/certifying official as listed in the application, SF 424, or the grant award document (GAN).

# **Note**

The grantee must notify the program officer in writing if the project director/principal investigator is going to be absent for a period of more than three months.

# **Consortium Project Responsibilities**

The activities conducted by all institutions in a consortium are equally important to the overall project and they complement the training, research, and outreach activities of each member institution. The extent to which activities are well-coordinated and communication occurs between/among the institutions determines the overall success and effectiveness of the consortium.

In a consortium project, the Project Director at the lead institution (the institution that receives the Grant Award Notification) is responsible for ensuring that all consortium partners conduct their respective activities in compliance with the approved plan; use grant funds in accordance with the negotiated revised budget; and, submit performance report data and narratives on time and in a complete manner. The grantee, as the direct and primary recipient of IFLE grant funds, is accountable to IFLE for the performance of the project, the appropriate expenditure of grant funds by all parties, applicable reporting requirements, and all other obligations of the grantee. In sum, the lead institution is accountable for all partner institutions with regards to reporting, activities, and outcomes of the grant.

## **FAQ**

**Q:** Should each institution within a consortium submit separate yearly budgets? **A:** IRIS will only allow one file to be uploaded. Each institution should submit their budgets on a separate sheet, within *one* file (e.g. two Excel worksheets within one Excel Workbook)

## **Subawards**

Grantees can establish a subaward, or consortium agreement, with any outside organization that performs any of their grant-supported research activities. For example, allocating a sum of money from an NRC to an LRC to create instructional materials constitutes a subaward. However, providing a faculty professional development stipend to a faculty member at the consortium partner is not a subaward.

Each subaward must have a formal written agreement for meeting the administrative, financial, and reporting requirements of a grant. IFLE holds grantees accountable for their subawardees' research, spending, and reporting actions, which must conform to all terms and conditions of a grant award. Subawardees cannot use funds from the grantee to form their own subaward agreements with other organizations—no third party or third tier subawards are allowed. Project Director's must approve subawardee actions that are consistent with the terms and conditions of the grant only.

# **International Education General Provisions: Definitions**

The following definitions are found in part 656, §656.7 and are applicable to the National Resource Centers Program:

- Area studies means a program of comprehensive study of the aspects of a world area's society or societies, including study of history, culture, economy, politics, international relations, and languages.
- Center means an administrative unit of an institution of higher education that has direct access to
  highly qualified faculty and library resources, and coordinates a concentrated effort of educational
  resources, including language training and various academic disciplines, in the area and subject
  matters described.
- Comprehensive center means a Center that (1) contributes significantly to the national interest in advanced research and scholarship; (2) offers intensive language instruction; (3) maintains important library collections related to the area of its specialization; (4) makes training available to a graduate, professional, and undergraduate clientele; and (5) engages in curriculum development and community outreach.
- Intensive language instruction means instruction of at least five contact hours per week during the academic year or the equivalent of a full academic year of language instruction during the summer.
- Undergraduate center means an administrative unit of an institution of higher education that (1) contributes significantly to the national interest through the education of students who matriculate into advanced language and area studies programs or professional school programs; (2) incorporates substantial international and foreign language content into baccalaureate degree programs; (3) makes training available predominantly to undergraduate students; and (4) engages in research, curriculum development, and community outreach.

The following definitions are found in part 657, §657.5 and are applicable to the Foreign Language and Area Studies Fellowships Program:

 Center means an administrative unit of an institution of higher education that has direct access to highly qualified faculty and faculty resources, and coordinates a concentrated effort of educational activities, including training in modern foreign languages and various academic disciplines, in its subject area.

- Fellow means a person who receives a fellowship under this part.
- Fellowship means the payment a fellow receives under this part.
- Program means a concentration of educational resources and activities in modern foreign language training and related studies.

# Fly America Act and Open Skies Partnerships

The Fly America Act (49 U.S.C. 40118) generally provides that foreign air travel funded by Federal government money may only be conducted on U.S. flag air carriers. A "U.S. flag air carrier" is an air carrier that holds a certificate under 49 U.S.C. 41102 but does not include a foreign air carrier operating under a permit. There are limited circumstances under which use of a foreign-flag air carrier is permissible. These circumstances are outlined below:

## **Note**

Due to security concerns, we do not allow students to travel to certain parts of the world using Title VI money. Because security situations are often fluid, it is not possible for us to generate a stable list of countries to which we do not allow student travel. Program officers closely monitor the security situations throughout their world areas and will decide together, and with reference to the State Department's travel warnings pages, where student travel will be allowed and where it will not. Please check with your program officer if you have any doubts or questions about the possibility of travel to certain countries and keep in mind that travel approvals may be revoked if security situations change.

Airline "Open Skies" Agreement. A foreign flag air carrier may be used if the transportation is provided under an air transportation agreement between the United States and a foreign government, which the Department of Transportation has determined meets the requirements of the Fly America Act. For example, in 2008, the U.S. entered into an "Open Skies" Agreement with the European Union (EU). This Agreement gives European Community airlines (airlines of Member States) the right to transport passengers and cargo on flights funded by the U.S. government, when the transportation is between a point in the United States and any point in a Member State or between any two points outside the United States.

The U.S.-EU Open Skies Agreement was <u>amended</u> effective June 24, 2010. GSA issued <u>Guidance</u> October 6, 2010. Pursuant to the amendment, federal contractors and recipients (not U.S. Government employees) need not be concerned about city-pair contract fares. However, contractors and recipients must check with the airline to ensure that the airline is covered by the U.S.-EU Open Skies agreement which may change periodically.

Additionally, pursuant to the amendment, EU airlines are no longer limited to flying passengers between points in the United States and points in the EU. Instead, EU airlines are authorized to transport passengers between points in the United States and points outside the EU if the EU airline is authorized to serve the route under the U.S.-EU Open Skies Agreement. This includes flights that originate, arrive, or stop in the European Union. For additional information, please see the text of the <u>Amendment</u> and <u>GSA Bulletin FTR 11-02</u>. For information on other "open skies"

- agreements in which the United States has entered, refer to GSA's Web site: http://www.gsa.gov/portal/content/103191.
- 2 <u>Involuntary Rerouting.</u> Travel on a foreign-flag carrier is permitted if a U.S.-flag air carrier involuntarily reroutes the traveler via a foreign-flag air carrier, notwithstanding the availability of alternative U.S.-flag air carrier service.
- Travel To and From the U.S. Use of a foreign-flag air carrier is permissible if the airport abroad is: (a) the traveler's origin or destination airport, and use of U.S.-flag air carrier service would extend the time in a travel status by at least 24 hours more than travel by a foreign-flag air carrier; or (b) an interchange point, and use of U.S.-flag air carrier service would increase the number of aircraft changes the traveler must make outside of the U.S. by two or more, would require the traveler to wait four hours or more to make connections at that point, or would extend the time in a travel status by at least six hours more than travel by a foreign-flag air carrier.
- 4 <u>Travel Between Points Outside the U.S.</u> Use of a foreign-flag air carrier is permissible if: (a) travel by a foreign-flag air carrier would eliminate two or more aircraft changes en route; (b) travel by a U.S.-flag air carrier would require a connecting time of four hours or more at an overseas interchange point; or (c) the travel is not part of the trip to or from the U.S., and use of a U.S.-flag air carrier would extend the time in a travel status by at least six hours more than travel by a foreign-flag air carrier.
- 5 <u>Short Distance Travel.</u> For all short distance travel, regardless of origin and destination, use of a foreign-flag air carrier is permissible if the elapsed travel time on a scheduled flight from origin to destination airport by a foreign-flag air carrier is three hours or less and service by a U.S.-flag air carrier would double the travel time.

### Note

Travelers funded by federal grants should review GSA publication <u>Federal Travel</u> <u>Regulations</u> Section 301-10.106 for any City-Pair requirements and Section 301-10.135 for any Open Skies requirements. If grantees choose to use non-federal funds for international travel, they do not need to comply with the Fly America Act.

# **Code Sharing and The Fly America Act**

**O:** What is "code sharing"?

**A:** "Code sharing" is when a ticket is issued by one airline but operated by another. When a U.S. flag carrier leases seats on a foreign carrier and the ticketing code is from the U.S. airline, it meets the Fly America Act requirements. For example, on a flight from San Francisco, CA to Hong Kong:

- American Airlines flight 6117 (ticketed as AA6117), operated by Cathay Pacific Airways, is considered a U.S. carrier.
- Cathay Pacific Airways flight 873 (ticketed as CX873) is not considered a U.S. carrier even though it is the same flight as listed above.

# **Open Skies Agreements**

**Q:** What are Open Skies Agreements?

**A:** Open Skies agreements are bilateral air service agreements the U.S. Government negotiates with other countries to provide rights for airlines to offer international passenger and cargo services. They

are pro-consumer, pro-competition, and pro-growth. They include reciprocal obligations to eliminate government interference in commercial airline decisions about routes, capacity, and pricing, so airlines can provide more affordable, convenient, and efficient air service to consumers, promoting increased travel and trade, and facilitating broad economic growth. Open Skies agreements improve flexibility for airline operations, expand cooperative marketing opportunities between airlines, enable global express delivery cargo networks, liberalize charter regulations, and commit both governments to high standards of safety and security.

**Q:** Which Open Skies Agreements are authorized the Department of Transportation?

A: A foreign flag air carrier may be used if the transportation is provided under an air transportation agreement between the U.S. and a foreign government, which the Department of Transportation has determined meets the requirements of the Fly America Act. Since 1992, the United States has reached 121 Open Skies agreements with partners across six continents. Open Skies removes limits on the number of airlines permitted to provide service or frequencies. Recent Open Skies agreements include Ukraine, Serbia, Cote d' Ivoire, Seychelles, Togo, Azerbaijan, Curacao (Kingdom of the Netherlands), Saint Vincent and the Grenadines, the Republic of Congo (Brazzaville), and a modernized air transport agreement with Mexico.

**Q:** Is there a list of authorized Open Skies Agreements?

**A:** Yes! The U.S. General Services Administration (GSA) maintains an updated list here: <u>Current Open Skies Agreements</u>

Q: Does the Fly America Act supersede Open Skies Partnerships?

**A:** When Federal funds are used to fund travel, Section 5 of the International Air Transportation Fair Competitive Practices Act of 1974 (49 U.S.C. 40118) (Fly America Act) requires contractors, recipients, and others use U.S.-flag air carriers for U.S. Government-financed international air transportation of personnel (and their personal effects) or property, to the extent that service by those carriers is available. It requires the Comptroller General of the United States, in the absence of satisfactory proof of the necessity for foreign-flag air transportation, to disallow expenditures from funds, appropriated or otherwise established for the account of the United States, for international air transportation secured aboard a foreign-flag air carrier if a U.S.-flag air carrier is available to provide such services.

**Q:** May we reimburse travelers for an advanced payment of a conference or training registration fee? **A:** Yes, you may reimburse travelers for an advanced discounted payment for a conference or training registration fee as soon as you have approved their travel to that event, and they submit a proper TAR for the expenses incurred.

**Q:** May we include conference administrative costs in an employee's per diem allowance payment for attendance at a conference?

**A:** No. Per diem is intended only to reimburse the attendee's subsistence expenses. You must pay conference registration fees separately, either directly or by reimbursing employees who pay such expenses and submit TARs.

# **Verifying Compliance in IRIS**

When submitting a Travel Approval Request (TAR), grantees must certify that their proposed international itinerary is in compliance with the Fly America Act and/or Open Skies agreement. If the travel is eligible for an exception or allowable under an Open Skies partnership, the grantee should explain it in the

"comments" section. For more information on Travel Approval Requests, please see the section in this document under "Travel."

# **FAQ**

**Q**. Can I charge an airline ticket to my federal grant using a foreign air carrier if the cost is less expensive than a US based carrier?

**A.** No. According to the regulation, a foreign air carrier service cannot be charged to a Federal award for reasons of ticket cost, preference of the traveler, or convenience. In order to appropriately charge a foreign air carrier flight to a federal award, it must meet one of the allowable exceptions provided under the Fly America Act Regulation.

**Q**. Is it permissible to charge the grant for personal expenses/activities while traveling on Grant business?

**A.** No. Expenses charged to or requested for reimbursement from a sponsored grant award must directly benefit the sponsored award. Personal expenses, entertainment, and social activities while traveling on Grant status is not an allowable expense on a sponsored grant award and must typically be paid by traveler.

**Q**. Is it permissible to charge the grant for vaccinations while traveling on Grant business? **A**. Yes. Immunizations which might be required by a country as a condition for entry or are recommended because there is a risk of acquiring a particular disease during travel may be included on a TAR.

# **Grant Schedule and Continuation Awards**

# **Project Period and Budget Periods**

The **project period**, also known as the **performance period**, is the Department-approved time for a grantee to complete project activities described in the application. The FY 2018 NRC and/or FLAS project period is 48 months.

The NRC and FLAS multi-year grants are funded in annual increments (if funds are appropriated) called **budget periods**. A single budget period is a 12-month period. NRC and FLAS grants consist of four budget periods, as indicated in the chart in below.

NRC and FLAS Budget Periods

FISCAL YEAR	BUDGET PERIOD	ANNUAL YEAR	SUMMER	
2018	8/15/18 - 8/14/19	AY 2018-2019	Summer 2019	
2019	8/15/19 - 8/14/20	AY 2019-2020	Summer 2020	
2020	8/15/20 – 8/14/21	AY 2020-2021	Summer 2021	
2021	8/15/21 – 8/14/22	AY 2021-2022	Summer 2022	

# **Continuation Awards and Risk Management**

# **Continuation Awards**

Continuation awards are non-competing funding for remaining budget periods of an approved award. Continuation awards are provided *after* the grantee submits an annual performance report (required during each year of the grant cycle) that demonstrates substantial progress.

**Q:** When are grantees notified regarding the funding levels for subsequent years? **A:** Before a continuation grant award is issued, the IFLE program officer will review the annual performance report to determine whether substantial progress has been made on award. Substantial progress includes, but is not limited to:

- current data;
- budget and narrative information supporting the approved objectives of the NRC grant; exemplary program/project achievements.

**Q:** When will grantees be informed of the amount of funding for subsequent years? Will funding remain "level"?

**A:** Continuation award amounts are not guaranteed to be the same amount throughout the grant cycle and can be affected by several factors, including changes in congressional appropriations, a determination that substantial progress has not been made, or other programmatic or budgetary factors.

The program officer will inform the grantee in Year 1 about the prospective funding amounts for Years 2, 3 and 4. The grantee is required to submit a revised budget for each year there are changes to the continuation award amount.

Q: What criteria do IFLE staff review prior to making a decision regarding continuation awards?

**A:** The following is a list of questions that may be taken into consideration when assessing grantee risks, before recommending continuation awards. This is not an all-inclusive list, and program staff may identify additional areas for consideration as they conduct a risk assessment:

- Has the grant or entity been designated as high risk?
- Has the grantee demonstrated compliance with risk mitigation strategies imposed upon the grant award to correct the cited risk conditions?
- Were there any excessive drawdowns during the previous budget period?
- Is there a large available balance which will result in a carryover request?
- Has there been frequent turnover of the project director?
- Has substantial progress been made; if not, why?
- Have all required reports been submitted?
- Has progress been made on corrective actions, if applicable?

- Are there any 2 CFR Part 200, Subpart F Audit Requirements audit findings; or, is the grantee making progress in resolving prior 2 CFR Part 200 Subpart F Audit Requirements audit findings?
- Is the grant on schedule to achieve its objectives?

# **Risk Management**

**Q:** What information do IFLE program staff review when conducting a risk assessment? **A:** In addition to the list of questions above when conducting a risk assessment, program staff must consider prior and/or current financial and performance information reported in G5 and IRIS, compliance with federal audit requirements, audit findings, the institution's responses to corrective actions to resolve audit findings, and other administrative issues. Additionally, program staff must consider any issues or concerns, identified through day-to-day oversight, routine monitoring, and technical assistance efforts, that might adversely affect a grantee's performance under a continuation award.

When conducting a risk assessment for continuation awards, program staff may also consider the grant award history in G5 and any relevant information observed from working with the grantee, such as inefficient internal controls, poor oversight of the project, etc.

### **Note**

IFLE program officers will consult with the Office of the General Counsel (OGC) and ED Risk Management Services to employ additional risk mitigation strategies, if needed.

# **NRC** and FLAS Reporting in the IRIS System

Grantees must submit interim and annual performance reports using the IRIS electronic reporting system. The performance reports assist IFLE staff in determining whether or not the grantee is making substantial progress toward meeting the approved project objectives and whether or not awarding a continuation award is in the best interest of the Federal Government.

IFLE advises grantees to put as much care into preparing their IRIS performance reports to describe their progress towards their project objectives as they did when preparing their grant applications for the competition. Performance report narratives, Performance Measure Forms (PMFs), and data should convey compelling information about grant activities and provide evidence of the impact of the grant activities.

# Interim, Annual, and Final Performance Reports

During the life of the grant cycle, grantees are required to submit the following reports:

# **National Resource Center Reports**

- Interim data reports submitted by October 15 (NRC program)
- Annual performance report on or before April 1
- Final performance report **and** a final Financial Status Report (SF 425) at the end of the four-year project period (November 11, 2018)

# Foreign Language and Area Studies Fellowships Reports

- Interim academic year (AY) reports: due on or before October 15
- Final AY reports (institution and student): due on or before July 1
- Interim Summer (S) reports: due on or before July 1
- Final S reports (institution and student): due on or before October 15

## **Note**

Please refer to the <u>reporting schedule in IRIS</u> to view the report due dates and the content for each report type. IFLE may revise the report due dates under certain conditions.

# FLAS Fellows: Pre- and Post-Language Evaluations

As soon as eligible academic year FLAS fellows and summer FLAS fellows are selected, the FLAS Coordinator must assign all fellows to a qualified language evaluator who will administer the pre-and post-language evaluations. FLAS Coordinators assign the fellows in the International Resource Information System (IRIS). In assigning evaluators, it is our expectation that the evaluator who administers the fellow's pre-language evaluation will be the same evaluator who will administer the fellow's post-language evaluation. Please advise your language evaluators that they are required to conduct both evaluations for all fellows who are assigned to them.

The <u>IRIS reporting instrument</u> includes instructions and screens for grantees to input data and information about their grant activities. In addition to describing the grantee's achievements for a reporting period, the IRIS information demonstrates how a particular program's projects respond to the Government Performance and Results Act (GPRA) measures established for that program to assess overall program performance.

The Project Director is responsible for reviewing and submitting the performance reports into the web-based International Resource Information System (IRIS). If a grantee fails to submit a performance report, the Department will not issue a continuation grant award.

# Government Performance and Results Act (GPRA) of 1993 and the Government Performance and Results Modernization Act of 2010

## **GPRA Measures**

The Department is required by the Government Performance and Results Act (GPRA) to submit data on grantee performance to the Office of Management and Budget. The information provided by grantees in their performance reports submitted via the IRIS reporting system will be the source of data for reporting on the GPRA measures. The Department has developed (and the Office of Management and Budget has approved) the following GPRA measures to evaluate the overall success of this IFLE grant program:

## **National Resource Center GPRA Measures**

- 1. Percentage of priority languages (as defined by the Secretary of Education) taught at NRCs.
- 2. Percentage of NRC grants teaching intermediate or advanced courses in priority languages (as defined by the Secretary).
- 3. Percentage of NRCs that increased the number of intermediate or advanced level language courses in the priority and/or LCTLs during the course of the grant (long-term measure).
- 4. Percentage of NRCs that increased the number of certificate, minor, or major degree programs in the priority and/or LCTLs, area studies, or international studies during the course of the four-year grant period.
- 5. Percentage of less and least commonly taught languages (as defined by the Secretary) taught at Title VI NRCs.
- 6. Cost per NRC that increased the number of intermediate or advanced level language courses in the priority and/or LCTLs during the course of the grant period.

## Note

The IFLE office will be able to calculate the Efficiency Measure based on the FLAS reports that are submitted into IRIS.

# Foreign Language and Area Studies Fellowships GPRA Measures

- 1. Percentage of FLAS-graduated fellows who secured employment that utilizes their foreign language and area studies skills within eight yearsafter graduation based on a FLAS tracking survey.
- 2. Percentage of FLAS master's and doctoral graduates who studied priority languages (as defined by the Secretary of Education).
- 3. Percentage of FLAS fellows who increased their foreign language reading, writing, and/or listening/speaking scores by at least one proficiency level.

4. Cost per FLAS fellowship program fellow who increased his/her reading, writing, and/or listening/speaking language score by at least one proficiency level.

# **Performance Measure Forms (PMFs)**

**Q:** What are Performance Measure Forms (PMFs)?

**A:** PMFs were developed for the purpose of having grantees enter project objectives, measures, and targets for grant funding, to allow for greater flexibility related to managing grants in addition to data extraction capabilities for monitoring and analysis purposes.

Effective with the FY 2014 grant competitions, IFLE required applicant institution to include PMFs in their grant applications. IFLE implemented the PMF to collect quantifiable data elements, rather than narrative information, that we can use to demonstrate the impact and success of the National Resource Centers program more efficiently and effectively.

#### Note

PMFs are not required for the FLAS program.

A Performance Measure Form collects the following:

- Project Goal Statement (up to five): A Project Goal is a broad, overall statement of what the project is aiming to achieve/accomplish. The Project Goals you enter into IRIS must be selected from the Project Goals that you submitted in the grant application approved for funding. The Project Goals selected for the PMF do not have to cover every project goal in the approved application, but the three to five selected goals must align with the overall scope of the approved project. The Project Goals that you select should be reasonable and realistic representations of what you anticipate achieving by the end of the grant cycle; they should allow you and others to make a determination of your grant project's substantial progress.
  - 1) Enhance the capacity of collaborating MSIs and CCs to offer international studies courses.
  - 2) Obtain approval for articulation agreements between the NRC institution and the MSI and/or CC.
- Performance Measure. (at least one, but no more than three): The Performance Measure(s) is the metric against which you will measure whether the project is meeting its overall Project Goal. It should be specific and time-bound, with well-defined units of measure (number of students, number of courses, percentage increase, etc.). It should reflect the Project Goal, so that meeting the Performance Measure(s) would result in the achievement of the Project Goal, as in the sample PMFs. Performance Measures may address direct products and services delivered by a program (outputs), and/or the results of those products and services (outcomes). Performance Measures include not only "what" will be achieved, but "by how much".
  - 1) Increase by one annually, the number of faculty research grants awarded to faculty at the MSI or CC.

- 2) Expand the number of international studies courses by 100% by year two of the grant.
- Project Activities (at least one, but no more than three): Activities are actions that the grantee will carry out in order to meet the Performance Measure and achieve the Project Goal. Each Performance Measure will have at least one, and up to three, Activities. You may wish to include more than one Activity, if more than one Activity is necessary to meet a Performance Measure. In addition, if meeting the Performance Measure will take longer than one reporting period, you may include up to two additional "interim" Activities to measure yearly progress toward meeting the Performance Measure. This will provide concrete evidence of progress to include in every Annual Report.
  - 1) Survey the faculty at collaborating MSIs and CCs to determine interest in faculty research grants, and recruit faculty to participate in course development workshops
  - 2) Obtain approval to offer course(s)
  - **3)** Teach the course(s)
- Data Indicators (at least one, but no more than three): Data Indicators are specific, observable and measurable characteristics that can be used to determine whether carrying out the activity results in progress being made toward meeting the Performance Measure. Data Indicators are therefore linked to and should reflect both the Activity and the Performance Measure. One Data Indicator must correspond directly to the Performance Measure so that this relationship is explicit and so that evidence of meeting the Performance Measure is easy to document and express (see highlighted sequences in sample PMFs). When deciding on a Data Indicator, consider which types and sources of data will best demonstrate that the project is achieving, or will achieve, its objectives and intended outcomes.
  - 1) Faculty requests for professional development opportunities increase.
  - 2) Favorable minutes from the curriculum review board meetings
- Frequency for measuring the impact of the indicators
- Baselines, Targets, and Actuals: The <u>Baseline</u> is the initial value collected for the Data Indicator at or prior to the start of the program, which serves as a point of reference. The Targets are the planned values for the Data Indicators over the course of the project period. When completing the Annual Performance Report, you will provide the "Actual" value for the Data Indicator at the time of reporting. Baselines, Targets and Actuals are numerical and therefore quantitative.

Baselines, Targets and Actuals may be numbers or percentages. <u>Targets</u> may be discrete for each reporting period, or cumulative over the course of the performance period. Please indicate in the "Comments" box whether your Targets represent discrete or cumulative numbers. In either case, substantial progress is determined by whether the "<u>Actual</u>" entered at reporting time is equal to or greater than the Target.

- o baselines are established at the time the grant begins
- o targets are the planned incremental increases
- o actuals are the existing, real, factual unit of measure

Grantees will report on the status of their targets as part of the annual performance report. To the extent possible, grantees should incorporate some elements in their PMFs that will allow us to assess the overall progress towards the NRC program GPRA measures.

# **FAQ**

**Q:** Can we adjust the targets or just the wording of the PMFs?

**A:** There is flexibility and opportunity to adjust the targets during a specified time frame, e.g., during the first three months of the grant.

### **Note**

Please remember to submit the PMF with the NRC annual spring performance report, because we take the PMF information into consideration when deciding about substantial progress. If information in the report is incomplete or inadequate, you will not be eligible to receive a continuation grant award because continuation funding is contingent upon the grantee showing substantial progress.

# **National Resource Center (NRC) Grant Administration**

The NRC Program awards grants to institutions of higher education and consortia of institutions to establish, strengthen, and operate comprehensive and undergraduate Centers that will be national resources for:

- teaching of any modern foreign language;
- instruction in fields needed to provide full understanding of areas, regions, or countries in which the modern foreign language is used;
- research and training in international studies and the international and foreign language aspects of professional and other fields of study; and
- instruction and research on issues in world affairs that concern one or more countries.

# **Grant Priorities**

# **Implementation of Priorities**

- All grantees must meet the **absolute priority** for teacher training.
- If a grantee proposed to implement the **competitive preference priorities** in its application, it must carry out those proposed activities. When revising budgets, the activities for which the grantee received competitive preference priority points must not be eliminated.
  - Grantees will report on their progress implementing the competitive preference priorities in their IRIS reports.
- **Invitational priorities** are optional, do not receive points in a competition, and grantees are not required to implement the invitational priorities.

# **Absolute Priority**

ABSOLUTE PRIORITY 1.

"Applications that provide (1) an explanation of how the activities funded by the grant will reflect diverse perspectives and a wide range of views and generate debate on world regions and international affairs; and (2) a description of how the applicant will encourage government service in areas of national need, as identified by the Secretary, as well as in areas of need in the education, business, and non-profit sectors."

ABSOLUTE PRIORITY 2.

"Applications that provide for teacher training activities on the language, languages, area studies, or thematic focus of the Center."

### **Competitive Preference Priorities**

COMPETITIVEPREFERENCEPRIORITY1.

"Applications that propose significant and sustained collaborative activities with one or more Minority-Serving Institutions (MSIs) (as defined in this notice) and/or with one or more community colleges (as defined in this notice). These activities must be designed to

incorporate international, intercultural, or global dimensions into the curriculum of the MSI(s) or community college(s), and to improve foreign language, area, and intercultural studies or international business instruction at the MSI(s) or community college(s). If an applicant institution is an MSI or a community college, that institution may propose intracampus collaborative activities instead of, or in addition to, collaborative activities with other MSIs or community colleges.

# For the purpose of this priority:

Community college means an institution that meets the definition in section 312(f) of the HEA (20 U.S.C. 1058(f)); or an institution of higher education as defined in section 101 of the HEA (20 U.S.C. 1001)) that awards degrees and certificates, more than 50 percent of which are not bachelor's degrees (or an equivalent) or master's, professional, or other advanced degrees.

<u>Minority-Serving Institution</u> (MSI) means an institution that is eligible to receive assistance under sections 316 through 320 of part A of title III, under part B of title III, or under title V of the HEA.

The institutions designated eligible under title III and title V may be viewed at the following link: www2.ed.gov/about/offices/list/ope/idues/eligibility.html

#### COMPETITIVEPREFERENCEPRIORITY2.

"Applications that propose collaborative activities with units such as schools or colleges of education, schools of liberal arts and sciences, post-baccalaureate teacher education programs, teacher education programs, and teacher preparation programs on or off the NRC campus. These collaborative activities are designed to support the integration of an international, intercultural, or global dimension and world languages into teacher education, and/or to promote the preparation and credentialing of more foreign language teachers in less commonly taught languages (LCTLs) for which there is a demand for additional teachers to meet existing and expected future kindergarten through grade 12 language program needs."

# **Diverse Perspectives and Areas of Need**

The Title VI International Education Programs legislation ((20 U.S.C §1122(e)) requires that each institution of higher education or consortium of such institutions desiring a grant under the NRC and/or FLAS programs shall include the following descriptions in their grant applications:

- An explanation of how the activities funded by the grant will reflect diverse perspectives and a wide range of views and generate debate on world regions and international affairs; and
- A description of how the applicant will encourage government service in areas of national need, as identified by the Secretary, as well as areas of need in education, business, and non-profit sectors.

#### **Note**

If an application is submitted on behalf of a consortium, the application must include diverse perspectives and areas of national need descriptions for all institutions in the consortium.

### **Allowable Activities**

The list of allowable activities for comprehensive and undergraduate NRCs is in §656.3 of the program regulations. These activities include:

- teaching and research;
- conducting outreach activities to K-16 institutions, business, media, general public;
- developing interdisciplinary courses;
- offering performance-based language instruction and assessment;
- establishing overseas linkages;
- hosting summer institutes for area studies, foreign languages, and other international fields; and
- increasing library acquisitions.

All NRC budgets relate to these activities, in addition to the activities that address the teacher training absolute priority and the competitive preference and invitational priorities.

# **NRC Budgets**

To conduct the activities described above, NRC budgets typically include the following ED 524 form categories:

- Personnel
- Fringe Benefits
- Travel
- Supplies
- Contractual
- Other
- Indirect Costs
- Total Direct Costs

The Revised Budget (see Glossary), that grantees submitted and that ED program officers approved for the FY 2014-2017 cycle, represents the spending plan proposed for implementing NRC project activities.

Grantees are allowed to make adjustments to their budget plans without prior approval, as long as the revisions do not materially alter the overall budget and scope of project activities that the budget supports. NRCs receive FY 2018-2022 grant awards through a competitive peer review process for a specific set of activities that they proposed to conduct. Budget revisions, therefore, must not significantly alter the scope of those activities and expectations.

Grantees are allowed to transfer funds between line items provided that the cumulative transferred amount does not exceed 10% of the total budget. For example, if the total budget is \$220,000, the cumulative amount transferred must not exceed \$22,000. For transfers exceeding the 10% threshold, grantees must obtain prior written approval from the IFLE program officer.

If the amount of the budget transfer exceeds the 10% threshold, the Project Director is required to submit a brief written justification to the IFLE program officer explaining why the budget transfer is needed to conduct the project activities and why these funds were not included in the original budget. The justification must describe how the transfer is allowable, allocable, and reasonable in meeting the objectives of the approved plan, and that it does not materially alter the overall scope.

#### Note

EDGAR allows the program officer 30 days to act (e.g., approve, disapprove, or request more information). Although a 30-day timeframe is allowed, program officers usually review requests within the week the request is received or soon thereafter.

**Q:** What are examples of Indirect Costs?

**A:** Examples include: The costs of operating and maintaining facilities, equipment, and grounds (part of "facilities costs"); Depreciation allowances (part of "facilities costs"); and Salaries of administrators and services, such as payroll and personnel that benefit Federal programs (part of "administrative costs").

## **Drawdowns**

**Q:** How does the Department conduct fiscal monitoring?

**A:** The standards for financial management systems that grantees are required to follow are established in 2 CFR § 200.302. Every evening G5 will compare drawdown activity against preset drawdown thresholds established in G5 and will identify grants that appear to have atypical drawdown patterns (i.e., excessive or insufficient drawdowns). Additionally, G5 will identify route payment, reimbursement, and stop payment flags, and program staff must review and address these with grantees as deemed appropriate.

Grantees must follow the federal requirements, found in 2 CFR Part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements," regarding cash drawdowns.

### For cash drawn from the Department of Education grant account, the NRC must:

- Draw down only as much cash as is necessary to meet the immediate needs of the grant project;
- Keep to a minimum the time between drawing down the funds and paying them out for grant activities; and
- Return/reimburse the Government for all interest earned on grant funds deposited in interest-bearing bank accounts.

# Grantees are advised to do the following:

- Take into account the need to coordinate the timing of drawdowns with prior internal clearances (e.g., by boards, directors, or other officials) when projecting immediate cash needs so that funds drawn down from the department do not stay in a bank account for extended periods of time while waiting for approval;
- Continuously monitor the fiscal activity (drawdowns and payments) of the grant on a continuous basis;
- Plan carefully for cash flow during the budget period and review project cash requirements before each drawdown; and
- Pay for project activities as soon as practical after receiving cash from the Department.

#### **Note**

The Department monitors cash drawdown activity for all grants on a weekly basis. Department staff will contact grantees who appear to have drawn down excessive funds under one or more grants during the fiscal quarter.

The Department will contact a grantee who has drawn down:

- 50% or more of the grant in the first quarter;
- 80% or more in the second quarter; and/or
- 100% of the cash in the third quarter of the budget period.

However, amounts under these thresholds could still represent excessive drawdowns for particular grant activities in any quarter. Grantees that are identified to have drawn down excessive cash will be required to return excess funds to the Department, along with any associated earned interest, until the money is needed to pay for activities.

If you need assistance with returning funds and interest, please contact the Department's G5 Hotline by calling 1-888-336-8930.

Grantees that do not follow Federal cash management requirements and/or consistently appear on the Department's reports of excessive drawdowns could be:

- subject to specific award conditions or designated as "high-risk" grantees [2 CFR Part 200.207 and 2 CFR 3474.10], which could mean being placed on a "cash-reimbursement" payment method (i.e., a grantee would have to pay for grant activities with its own money and then wait for reimbursement from the Department afterwards);
- subject to further corrective action;
- denied selection for funding on future Department of Education grant applications [EDGAR 75.217(d)(3)(ii)]; and/or

 debarred or suspended from receiving future federal awards from any executive agency of the Federal Government.

All project directors, staff, and authorized representatives are urged to read 2 CFR Part 200.305 to learn more about federal requirements related to grant payments and to determine how to apply these requirements to any sub-grantees. Grantees are urged to make copies of this memorandum and share it with all affected individuals within the organization.

# **Carrying Over of Unobligated Balances**

Title 2 CFR 200 of the OMB "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" waives the prior approval procedures for carryover. Grantees are permitted to carry forward unobligated balances to subsequent funding periods, without obtaining prior approval from ED. This provision notwithstanding, it is a good idea to discuss your carryover amount with your IFLE program officer. Grantees are required to report on carryover in the IRIS annual report.

#### **Time Extension**

2 CFR of the OMB "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" allows grantees to initiate a one-time extension of up to 12 months for award's expiration date. For one-time extensions, the grantee must submit a written request – including supporting reasons and revised expiration date – to the program officer at least 10 days before the original expiration date specified on the award. This one-time extension may not be applied merely for the purpose of using unobligated balances.

# The time extension request letter must include the following information:

- PR/Award number of the grant being extended
- description of activities to be conducted during the time extension
- explanations(s) why the activity/ies could not be conducted during the performance period
- funds to be used during the time extension
- proposed end date for the grant

The 10-day prior notification is required to review the grantee's request and supporting explanations in order to change the end date in the G5 system and issue a revised Grant Award Notification with the updated project end date.

### **Travel Costs**

## General

The Uniform Guidance defines "travel costs" as the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business.

#### **Allowable Expenses for Travel**

Federal funds can be used to pay for airfare, hotels, meals, and incidentals for travel related to approved NRC activities and faculty professional development. The purposes of travel may include library acquisitions, establishing study abroad programs and other institutional linkages, course development research, and presentations at conferences that are directly related to the

faculty member's research and/or area of expertise. NRC funds cannot be used to support student travel. For information on student travel, please see the FLAS section on travel awards.

#### **Domestic Travel**

Domestic travel within the scope of approved NRC activities does not require approval by the IFLE program officer. However, travel expenses for hotels, meals, and incidentals cannot exceed the <u>per diem rate</u> set by the institution or the General Services Administration (GSA). The pre-tax hotel rate must be equal to or less than the GSA rate, and the allowance for meals and incidentals cannot exceed the GSA rate. Any expenses in excess of the GSA rates must be paid for by other sources.

### **International Travel**

All international travel expenses (either departing from or coming to the U.S.) covered with federal funds must be pre-approved by your IFLE program officer. Travel expenses include airfare, hotels, meals, and incidentals.

IFLE does <u>not</u> approve retroactive travel. Flights covered by federal funds must comply with the Fly America Act or one of the Open Skies Agreements (see explanation earlier in this document). Even if federal funds are only paying for the international hotel, the request must be pre-approved. Rates for hotels, meals, and incidentals cannot exceed the <u>foreign per diem rate</u> set by the Department of State. Expenses in excess of the Department of State rates must be paid for by other sources.

### **Car Travel**

If travel occurs by car, the reimbursement should not exceed the <u>privately-owned vehicle rate</u> established by GSA.

## **Travel after the End of the Grant Period**

According to EDGAR §75.707, funds required for travel are obligated at the time when travel is taken, *not* at the time that the airfare is purchased. As a result, the return date for travel cannot be after the close of the 4-year duration of the grant. A return date after the close of the grant is allowable only if a no-cost extension has been granted.

# **Travel Approval Requests (TARs)**

Requests to spend federal funds on international travel must be submitted in IRIS at least 30 days before the date of travel. This gives the program office enough time to approve the travel, consult with U.S. embassies (if necessary), address travel warnings and/or security concerns, and make any necessary revisions if the TAR was disapproved. IFLE does <u>not</u> make retroactive approvals, so grantees should <u>not</u> purchase tickets before receiving approval. In the meantime, travelers may make tentative, non-binding reservations in order to secure a price quote. A complete Travel Approval Request includes:

- An explanation of the purpose of the travel. This paragraph should explain how the travel relates to the approved NRC activities.
- A certification from the grantee that the travel is compliant with the Fly America Act or an Open Skies Agreement. Grantees are responsible for verifying that travel is

- compliant, and the submitter must check the Fly America Act/Open Skies certification box on the Travel Approval Request screen in IRIS.
- Under "explanation of expenditures," the grantee should itemize the federal funds going towards airfare, hotels, meals, and incidentals. For example: "2 nights hotel in São Paulo, Brazil, at \$282 each night = \$564. 2 days of meals and incidentals in São Paulo, Brazil, at \$126 each day = \$252."
- If the flight qualifies under an Open Skies Agreement, or if it meets another exception to the Fly America Act, the submitter should include an explanation in the comments section of how the flight meets the exception.

### **Note**

TARs are not required for domestic travel.

# Foreign Language and Area Studies (FLAS) Fellowships Administration

## **Purpose**

The Foreign Language and Area Studies (FLAS) Fellowships Program awards fellowships, through institutions of higher education, to students who are:

- a) Enrolled for undergraduate or graduate training in a Center or program approved by the Secretary; and
- b) Undergoing performance-based modern foreign language training or training in a program for which performance-based language instruction is being developed, in combination with area studies, international studies, or the international aspects of professional studies.

Reference: §657.1 FLAS regulations.

# Eligibility Requirements for Institutions and Students Institution Eligibility

- 1) The Department of Education awards an allocation of fellowships to an institution of higher education or a consortium of institutions of higher education that
  - a) Operates a Center or Program approved by ED;
  - b) Teaches modern foreign languages under a program described in paragraph (b) of this section;
  - c) In combination with the teaching described in (a)(2) of this section
    - i) Provides instruction in the disciplines needed for a full understanding of the areas, regions, or countries in which the foreign languages are commonly used; or

- ii) Conducts training and research in international studies, the international aspects of professional and other fields of study, or issues in world affairs that concern one or more countries.
- 2) In teaching those modern foreign languages for which an allocation of fellowships is made available, the institution must be either using a program of performance-based training or developing a performance-based training program.
- 3) The Department uses the criteria in §657.21 both to approve Centers and programs for the purpose of receiving an allocation of fellowships and to evaluate applications for an allocation of fellowships.
- 4) An institution does not need to receive a grant under the National Resource Centers Program (34 CFR part 656) to receive an allocation of fellowships under this part (34 CFR part 657).

## **Student Eligibility**

According to the FLAS regulations (§657.3), a student is eligible to receive a fellowship if the student –

- a) Is a citizen or national of the United States or is a permanent resident of the United States;
- b) Is accepted for enrollment or is enrolled in an institution receiving an allocation of fellowships and in a program that combines modern foreign language training with
  - i) Area or international studies; or
  - ii) Research and training in the international aspects of professional and other fields of study;
- c) Shows potential for high academic achievement based on such indices as grade point average, class ranking, or similar measures that the institution may determine;
- d) Is enrolled in a program of modern foreign language training for a language for which the institution has developed or is developing performance-based instruction;
- e) In case of an undergraduate student, is in the intermediate or advanced study of a less commonly taught language; or
- f) In the case of a graduate student, is engaged in
  - i) Predissertation level study;
  - ii) Preparation for dissertation research;
  - iii) Dissertation research abroad; or
  - iv) Dissertation writing at the homeinstitution

## Note

To be eligible to receive a FLAS fellowship, the students must be matriculating at a U.S. institution of higher education.

# Competitive Preference Priorities FLAS Competitive Preference Priority 1

FLAS Fellowships for Students who Demonstrate Financial Need

Applications that propose to give preference when awarding fellowships to undergraduate students, graduate students, or both, who demonstrate financial need as indicated by the students' expected family contribution, as determined under part F of title IV of the HEA. This need determination will be based on the students' financial circumstances and not on other aid.

The applicant must describe how it will ensure that all fellows who receive such preference show potential for high academic achievement based on such indices as grade point average, class ranking, or similar measures that the institution may determine.

## **FLAS Competitive Preference Priority 2**

Academic Year FLAS Fellowships Awarded in the Less Commonly Taught Languages

Applications that propose to award at least 25 percent of academic year FLAS fellowships in modern foreign languages other than French, German, and Spanish.

# **Diverse Perspectives and Areas of Need**

The Title VI International Education Programs legislation ((20 U.S.C §1122(e)) requires that each institution of higher education or consortium of such institutions desiring a grant under the NRC and/or FLAS programs shall include the following descriptions in their grant applications:

- An explanation of how the activities funded by the grant will reflect diverse perspectives and a wide range of views and generate debate on world regions and international affairs; and
- A description of how the applicant will encourage government service in areas of national need, as identified by the Secretary, as well as areas of need in education, business, and non-profit sectors.

## **Note**

If an application is submitted on behalf of a consortium, the application must include diverse perspectives and areas of national need descriptions for all institutions in the consortium.

#### Types

An allocation of fellowships may include academic year (AY) graduate fellowships, AY undergraduate fellowships, and Summer (S) fellowships.

#### **Duration**

An institution may award a fellowship to a student for one academic year to complete coursework in language and area studies; or for the summer, if the summer session provides the fellow with the equivalent of one academic year of intensive modern foreign language study.

#### **FLAS Fellowship Amounts**

The fellowship amount depends on the fellowship type. The table below indicates the institutional payment and the subsistence allowance for each fellowship type.

FY 2014-2017 FLAS FELLOWSHIP Amounts

Payment Type	Academic Year Fellowship GRADUATE	Academic Year Fellowship UNDERGRADUATE	Summer Fellowship
Institutional Payment (Tuition)	\$18,000	\$10,000	\$5,000
Subsistence Allowance (Stipend)	\$15,000	\$5,000	\$2,500
Total Fellowship Amount	\$33,000	\$15,000	\$7,500

# FLAS Student Application and Selection Process Student Applications

A student shall apply for a fellowship directly to an institution of higher education that has received an allocation of fellowships. The student provides information to enable the institution to determine whether he or she is eligible to receive a fellowship and whether he or she should be selected to receive a fellowship. (Reference: §657.11)

To be considered for a fellowship, an undergraduate student must be at the intermediate or advanced study of a less commonly taughtlanguage.

### **Selection Process**

Section 657.21 (a) of the FLAS program regulations outlines standards for a high-quality plan for selecting FLAS fellows. At the minimum, the plan must:

- explain how fellowship opportunities will be advertised
- provide clear guidance to fellowship applicants about the application process
- be transparent about the criteria that the FLAS committee will use to make its selections
- indicate who will serve on the selection committee
- provide a timeline for all activities in the FLAS selection process

explain how the FLAS selection process fulfills the requirements for any pertinent FLAS competitive priorities

#### Note

When selecting students for FLAS fellowships, institutions must take the Competitive Preference Priorities 1 and 2 into consideration (see above).

# Coursework to Fulfill FLAS Requirements Academic Year (AY) Fellowship Requirements

- An AY fellowship may be used to enroll in a domestic or and overseas program of study.
- AY courses, whether taken at the home institution or at an overseas institution, or both, must be in compliance with the student's home institution area studies and language training requirements, in addition to meeting the FLAS program requirements.
- AY courses work supported by a FLAS fellowship must include at least one language course and one area studies course during each academic quarter, semester, or trimester.
- AY fellowship for dissertation research. Dissertation FLAS fellowships must be used to conduct research abroad. Only students at the advanced level of the language are eligible to receive an AY fellowship to conduct dissertation research.
- Using the language in conducting the dissertation research project must provide the FLAS fellow the intensive training that a full academic year of formal classroom instruction would provide.

# Summer (S) Fellowship Requirements

- A summer fellowship is awarded *only* for intensive language study.
- A summer fellowship may be used at a domestic program, an overseas program, or both.
- A summer session (domestic or overseas) qualifies as an intensive language program if
  - o it is at least six weeks in duration and offers at least 120 contact hours of instruction for students at the advanced level.
  - o it is at least six weeks in duration and offers at least 140 contact hours for students at the beginning or intermediate level of the language.

#### Note

Field trips and excursions cannot be used to fulfill contact hour requirements.

A student may meet the required number of weeks and contact hours by attending one program, attending more than one program, or supplementing hours with private tutoring, as long as the required total number of weeks and contact hours is obtained. If a student's plan of study includes private tutoring, the FLAS coordinator must submit a syllabus for the tutoring and the instructor's CV.

## **Intensive language instruction**

Intensive language instruction means instruction of at least five contact hours per week during the academic year or the equivalent of a full academic year of language instruction during the summer.

# **Ancient and classical languages**

Institutions shall not award fellowships for the study of ancient and classical languages because these languages are inconsistent with the purpose of the FLAS program. The eligibility requirements in §657.3 explicitly state that students enrolled in modern foreign language training are eligible to receive fellowships.

# **Proficiency Level Requirements**

Fellowships may not be awarded for the study of the first 12 semester hours or the equivalent (i.e., the beginning level) of a commonly taught language (Spanish, French, and German).

HEA section 602(b)(1)(B)(i) is unequivocal that undergraduate students must be in the intermediate or advanced study of a less commonly taught language to receive a fellowship.

Graduate students may also not receive fellowships for the beginning level of a language study. See section 602(b)(1)(B)(ii) (U.S. Department of Education, Office of the General Counsel). An exception might be made for the beginning level of a less commonly taught language if a graduate student has achieved advanced proficiency in another language of the world area of specialization, and if learning a second language of that world area is required for the student's overall training and expertise.

## **Grades and Credits for FLAS Courses**

Students should receive grades and credits for the area studies courses and language courses supported by a FLAS fellowship. This requirement is consistent with the institution being awarded an allocation of fellowships based on its performance-based instructional programs.

However, should the institution's policies not require grades for certain courses, the institution must provide an explanation in the comments section of its FLAS performance reports.

## Approval of an Independent Study to Fulfill FLAS Requirements

An independent study or a directed reading may be used to fulfill the area studies course requirement or the language course requirement of an academic year fellowship. To request approval, the institution must submit the following to the IFLE programofficer:

- Syllabus for the independent study or directed reading that describes-
  - o the content and context of the independent study
  - o course objectives
  - o course requirements
  - o standards for evaluating the student

- o schedule for the assignments and deliverables
- o bibliography
- o The instructor's curriculum vitae
- o An explanation for why an independent study is necessary

# **Distance Education Courses and FLAS Fellowships**

Distance education courses may be approved to fulfill FLAS requirements, as long as the courses are "face-to-face" with the instructors. Grantees are required to follow the approval process described in the "Independent Study" section to obtain approval to use a newly proposed distance education course to fulfill a FLAS course requirement. If the distance education course is an established course with an approved course number and curriculum, prior approval of the course itself is not required. You are required, however, to notify your program officer that the course is being used as a FLAS course.

# **Internships During a Fellowship Period**

The program regulations are explicit in defining the duration and use fellowships. Academic year FLAS fellowships must be used for either for area studies and language courses or for dissertation research abroad during the academic year. Summer fellowships must be used for intensive language training equivalent to a full academic year of language study.

The Title VI legislation, FLAS program regulations, and the IFLE programs' appropriations language all currently prohibit internships to fulfill the training required during a FLAS academic year or summer fellowship period. (U.S. Department of Education, Budget Service Office)

Note: This is different from requests that IFLE receives that use the term "internship" to describe the opportunities that FLAS students might have to enhance their training, by using the language in settings apart from their formal FLAS-approved program. These are typically done as an add-on and the "internship" in no way interferes with students FLAS training responsibilities.

When the Higher Education Act is up for reauthorization, this will be an opportunity for program changes to be taken into consideration such as allowing the use of FLAS fellows for internships. (U.S. Department of Education, Budget Service Office)

# **Employment During a Fellowship Period**

A student is allowed to work and hold a FLAS fellowship at the same time. The most common practice of employment during the FLAS period is awarding FLAS fellowships to Teaching Assistants or Graduate Assistants.

### FLAS Award Disbursement & Other Issues

#### **Fellowship Definition**

A fellowship means the payment a fellow receives. Each fellowship includes an institutional payment and a subsistence allowance amount determined by the U.S. Department of Education. (References: §§ 657.5(c) and 657.31(a) (2))

## Institutional Payment Limitations (Reference: 657.31 (a) (3))

- 1. If the announced institutional payment amount is greater than the tuition and fees charged by the institution, the institutional payment portion of the fellowship is limited to actual tuition and fees. The difference between actual tuition and fees and the announced institutional payment shall be used by the institution to fund additional fellowships (institutional payments) to the extent that funds are available to give the fellow a full subsistence allowance.
- 2. If the institution's actual tuition and fees exceed the announced institutional payment, the institution is not required to cover the excess. Neither the HEA or program regulations address the issue of what happens when a fellowship does not cover tuition. As a result, ED cannot require that the institution cover that cost. The institution could choose to cover the cost, of course, but it may also hold the student responsible for the remainder, which the student could pay in cash, with other grants, with student loans. (U.S. Department of Education, Office of the General Counsel).

#### Note

It is unallowable to use FLAS funds to cover excess tuition and fees.

#### Subsistence Allowances (Reference: §657.32 (a), (b))

- 1. An institution shall pay a fellow his or her subsistence allowance in installments during the term of the fellowship.
- 2. An institution shall only pay a fellow who is in good standing and who is making satisfactory progress.

## Travel Awards (applicable to summer fellowships only)

A summer FLAS student may receive a travel award in the amount of \$1,000 or the actual cost of the travel – whichever is less – to attend a domestic or an overseas language program. Travel awards may not be issued to students whose air travel is not in compliance with the Fly America Act or an Open Skies Agreement. Travel awards may cover the costs of travel via air, car, rail, or bus. FLAS coordinators must submit a travel approval request (TAR) in IRIS for each student receiving a FLAS travel award.

#### FLAS Fellowships and Other Funding for the Same Award Period

When determining fellowship packages for students, FLAS institutions should advise students to accept either the FLAS fellowship or another offer of support to ensure that the limited number of FLAS fellowships is used efficiently and benefits the greatest number of eligible students.

That said, if a FLAS student receives another offer of support, he or she is allowed to accept the additional funding as long as it does not duplicate what is covered by the FLAS fellowship. For example, if the other source of funding covers tuition and fees, the student should not receive a FLAS institutional (tuition) payment.

#### Partial Awards (Academic Year FLAS Fellowships)

Academic year fellowships may be awarded to FLAS fellows for a single semester/trimester/quarter under certain conditions including, but not limited to, the following:

• the FLAS competition is conducted later than usual; therefore, the fellowships cannot be awarded for the entire award period

- a FLAS fellow graduates at the end of the fall semester, leaving an unused partial fellowship available for an eligible alternate
- a FLAS fellow forfeits his or her AY fellowship before the fellowship period ends

In the case of a partial award, the fellowship amount should be pro-rated accordingly.

## Forfeited, Terminated, or Withdrawn Fellowships

## Forfeited Fellowships

If a fellow vacates a fellowship before the end of an award period, the grantee institution may award the balance of the fellowship to another student if:

- 1. The student meets the eligibility requirements in §657.3; and
- 2. The remaining fellowship period comprises at least one full academic quarter, semester, trimester, or summer session. (Reference: \657.30(b)(1)(2).)

#### Vacancy for Reasons of Withdrawal

The institution is required to use funds not used by one recipient for reasons of withdrawal to support an alternate recipient to the extent that funds are available for a full subsistence allowance. (Reference: \$657.32(d))

## Tuition Repayment for Students Who Withdraw in Extenuating Circumstances

Repayment decisions are made on a case-by case basis. FLAS Coordinators are advised to contact their IFLE program officer for guidance when these situations arise.

#### Fellowship Termination

An institution shall terminate a fellowship if:

- The fellow is not making satisfactory progress, is no longer enrolled, or is no longer in good standing at the institution; or
- The fellow fails to follow the course of study including modern foreign language study for which he or she applied, unless a revised course of study is otherwise approvable under the FLAS regulations. (Reference: 657.34 (a)(b))

## **FAQ**

**Q:** What steps may an institution take to terminate a fellowship?

**A:** If there are no reported extenuating circumstances, the student must repay any fellowship funds that have been disbursed to them (to the institution). The remaining funds that have not been disbursed can be used to award another student a summer fellowship, or a fall fellowship, whichever the Center opts to do.

#### Options for Expending Unused FLAS Funds

Below is a list of allowable options for institutions to expend excess FLAS funds. The Department strongly encourages grantees to expend their entire FLAS allocation during the budget period for which the fellowships were allocated, to the extent possible. This mitigates the risk of accruing large unobligated balances at the end of the grant cycle (August 14, 2018).

#### Unused Academic Year Fellowship Funds

- 1. Award fellowship(s) to alternate(s) selected from the approved pool of academic year FLAS candidates.
- 2. Time and resources permitting, convene a FLAS selection committee and conduct another competition to select additional candidates, if there are no available alternates.
- **3.** Notify the other FLAS grantee center(s) on campus that you have academic year fellowships available.
- **4.** Notify all other FLAS grantee centers nationwide that you have academic fellowships available. FLAS funds may be transferred to other FLAS institution, regardless of their world area focus.

Note: When contributing funds to another FLAS grantee, the institution that covers the greater portion of a student's fellowship, is the institution that is responsible for that fellow in terms of IRIS reporting.

- 1. Change the targeted applicant pool. For example, if the unused academic year fellowships were initially requested for graduate students, run another competition to select eligible undergraduate recipients. Notify your IFLE program officer of the revised allocation.
- 2. Use excess funds to make additional summer fellowships and/or summer travel awards.
- **3.** Make arrangements with domestic summer language institutes to offer fellowships to eligible students enrolled at the institutes.
- **4.** Obtain approval to carry the excess academic year fellowships into the next budget period and use the funds to award additional academic year awards.

#### **Unused Summer Fellowship Funds**

- 1. Select alternate(s) from the list of approved summer FLAS candidates.
- 2. Time and resources permitting, convene a FLAS selection committee and conduct another competition to select additional candidates, if there are no available alternates.
- **3.** Notify the other FLAS grantee center(s) on campus that you have summer fellowships available.
- 4. Notify other FLAS grantee centers nationwide that you have summer fellowships available.
- **5.** Notify the domestic summer intensive language institutes that you have summer fellowships available.
- **6.** Make additional summer fellowships and/or summer travelawards.

#### **PROGRAMADMINISTRATIVEMANUAL**

Note: Grantees should make every effort to expend summer fellowships for the period for which they were allocated. Carry-over of summer fellowships is more "problematic" in terms of the FLAS program budget periods; therefore, IFLE program officers are unlikely to approve such requests.

## Overseas Program Requests (OPRs)

## **Purpose**

An OPR is required to request the IFLE program officer's approval of:

- 1. Overseas area studies and language programs during the academic year,
- 2. Overseas language programs during the summer.

## Submitting an OPR into IRIS

The FLAS Coordinator submits a student's OPR into IRIS at least 30 days prior to the student's travel date.

The OPR must include following:

- FLAS grant PR award number:
- Institution: (home institution)
- World area:
- Report: (indicate which FLAS session applies to the student, e.g., Summer 15 or AY 15-16)
- Fellow Name:
- Language:
- Level:
- Total number of weeks:
- Total number of hours:
- Country:
- Additional countries:
- Departure date:
- Return date:
- Program start date:

#### PROGRAMADMINIST RATIVEMANUAL

- Program end date:
- Program web site:
- Justification:
- Submit date:

The IFLE program officer will review the OPR to ensure that the justification clearly describes how the overseas program is relevant to the student's training. The program officer will also ensure that the program is of high quality and meets the FLAS program requirements. Once program completes the review and submits the approved or disapproved OPR, IRIS sends a notification to the FLAS Coordinator.

## Errors to Avoid When Completing an OPR

FLAS Coordinators are urged to avoid making the following most frequent errors that hinder the OPR review/approval process:

- An incorrect fellowship period is entered in the "Report" field. For example, the fellow is a recipient of an AY 14-15 fellowship, but the "Report" field shows AY 13-14.
- A weak explanation in the "Justification" section to explain the relevance of the overseas program to the student's training, academic trajectory, and career goals.
- Not providing details on which area studies courses and language courses the student proposes to take during the academic year overseas, if the OPR is requesting approval of an academic year program of study.
- A broken link to the program information.

#### Language Approval Requests (LARs)

#### **Purpose**

The web-based LAR is submitted in IRIS to request approval to add a FLAS-eligible language for:

- An academic year only
- A summer only
- The remainder of the grant cycle.

#### **Note**

A FLAS program must meet the required number of hours of intensive language training.

#### **Submit Process**

The FLAS Coordinator must submit the LAR at least two weeks in advance. The information requested in the LAR is similar to the OPR, but the main focus is the language and justification narrative accompanied by supporting documents.

#### Review Process

The IFLE program officer will review the LAR to ensure that the justification clearly describes how the additional language will be sustained and its relevance to the student's training. Once the review is complete, the program officer will approve (or disapprove) the LAR and return it to the grantee with comments. If the LAR is approved, the requested language automatically updates in IRIS and is added to the grantee's existing list of FLAS-eligible languages.

## **Dissertation Approval Requests (DARs)**

#### **Purpose**

The web-based DAR is submitted in IRIS to request approval for a student to conduct dissertation research abroad during the academic year.

#### **Submit Process**

The FLAS Coordinator must submit the DAR at least 30 days prior to the travel date. The DAR asks for the following information:

- Student information
- Organization affiliation(s)
- Institutional affiliation(s)
- Adviser name
- Dissertation research topic
- Methodology
- Research dates
- Visa status, Visa date
- Research permission status, Research permission date

#### **Review Process**

The IFLE program officer will review the DAR to ensure that the justification and methodology clearly describe the research activities that the student will conduct and why the project is important. Once the

review is complete, the program officer will approve (or disapprove) the request and return it to the grantee with comments. The most frequent error on the DAR is a weak description of methodology.

## **Smart Traveler Enrollment Program (STEP)**

The Smart Traveler Enrollment Program (STEP) is a free service from the Department of State that allows U.S. citizens and nationals traveling abroad to enroll their trip with the nearest U.S. Embassy or Consulate. In case of an emergency, the embassy can contact the traveler to provide important safety and security information or support during a crisis. **IFLE strongly recommends that FLAS coordinators enroll all of their FLAS fellows attending overseas programs at the <u>STEP website</u> for the safety of the students.** 

#### **Travel Warnings**

IFLE will not approve FLAS students to travel to countries where the State Department has strongly urged private American citizens to depart immediately for reasons of personal security (i.e., "ordered departure") or suspended its Fulbright program for the same reason. IFLE will not approve travel to countries under an "authorized departure" where the ambassador has specifically requested Fulbright project participants to leave for security reasons. For up-to-date information on travel warnings, consult the <u>Department of State</u> travel warnings and consular information sheets online.

#### Tips for Building and Fostering Community Among FLAS Fellows

Building and fostering a sense of community among FLAS fellows contributes to a successful FLAS program. FLAS Coordinators are encouraged to provide networking opportunities and professional development for FLAS students through the following activities:

- Host monthly meet-and-greets for all FLAS fellows
- Engage fellows in outreach activities and events
- Establish mentorships among the FLAS fellows
- Organize regular sessions to get "highlight" stories about what the fellows are doing.

#### FLAS Tracking Survey

## **Biennial Survey Authorized**

Section 601(d) of Title VI stipulates that grantees shall administer a survey to FLAS students who have completed programs to determine postgraduate employment, education or training. All grantees, where applicable, shall administer such survey once every two years and report survey results to the Secretary.

The survey asks questions to determine FLAS alumni's utilization of their foreign language and area studies training, such as—

1. Have their jobs required them to use their language they studied as a fellow? What about their area studies training?

- 2. Is speaking a foreign language/knowledge of a world area a requirement for their job?
- 3. How often do they use their foreign language/world area expertise in their job?
- 4. How has the FLAS fellowship been useful for their careers?

An additional set of questions is designed to collect data, including—

- 1. Number of FLAS fellowships received
- 2. Academic year vs summer, domestic vs overseas
- 3. Language, academic discipline, degree
- 4. Gender, age, race/ethnicity, location, years of employment.

## Acknowledging the Use of Federal Funds in Publications and Other Materials

As an institution receiving funding from the International and Foreign Language Education (IFLE) office of the U.S. Department of Education, it is beneficial both to you, as a grantee, and to the Federal Government, to publicize your project's activities and results. As an IFLE grantee, you are required to properly cite the NRC/FLAS program in all related publications, websites, newsletters, and press releases. Also, please provide a link to the IFLE website (www.ed.gov/ope/iegps) somewhere on your project website.

## Format for Citing Support

You must cite International and Foreign Language Education (IFLE) as your funding source in all project-related publications, websites, and press releases. The term "project materials" means a copyrightable work developed with funds from a grant issued by the Department. (34 CFR §75.622)

The following is the required citation (EDGAR CFR 75.620) for any digital or print publication that contains IFLE project materials:

"The contents of this (insert type of publication, such as book report, film) were developed under grant # from the U.S. Department of Education. However, those contents do not necessarily represent the policy of the U.S. Department of Education, and you should not assume endorsement by the Federal Government."

#### The Site Visit

During the grant performance period, the U.S. Department of Education program officer might conduct an on-site or virtual site visit of the grantee's project. The program officer will provide the grantee a report within 30 days after the site visit has concluded.

## Potential Purposes for Conducting A Visit

- Assess internal controls
- Ensure compliance with approved plan
- Identify project strengths and areas for improvement
- Observe and document promising practices
- Provide technical assistance
- Respond to complaints/high risk evidence

## **Pre-visit Preparation**

- Program officer notifies grantee of proposed dates for the site visit
- Once the dates are established, the program officer sends a letter to the grantee that includes the following:
  - Confirmed dates
  - Purpose of the visit
  - ED staff conducting the visit
  - Requested meetings, participants/interviewees
  - Requested financial documents/documentation and date to receive
  - Date to receive the first draft of the site visit agenda

#### Requested documents include, but are not limited to the following:

- Relevant organizational charts
- Policies and procedures for program management and fiscal operations
- Chart of accounts

#### PROGRAMADMINISTRATIVE MANUAL

- Key personnel lists and their time and effort forms
- Documentation for federal drawdowns to disbursements for the specified grant project
- Payroll documentation for the last 12 months
- Financial transactions for the last 12 months
- List of contracts supported with grant funds
- Project-related travel documentation
- A-133 audit documents (letter, summary sheet of findings and questioned costs, if applicable)

## Legislation and Regulation Resources

Program Legislation: <u>Title VI, Part A, Section 602(a) and (b) of the Higher Education Act of 1965, as amended</u>

International Education Programs General Provisions: 34 CFR 655

NRC Regulations: 34 CFR 656

FLAS Regulations: 34 CFR 657

20 U.S.C. Section <u>1122</u>

20 U.S.C. Sections <u>1132-1137</u>

Education Department General Administrative Regulations (EDGAR)

Uniform Guidance Regulations: 2 CFR 200

# **Appendix A - Sample Budget**

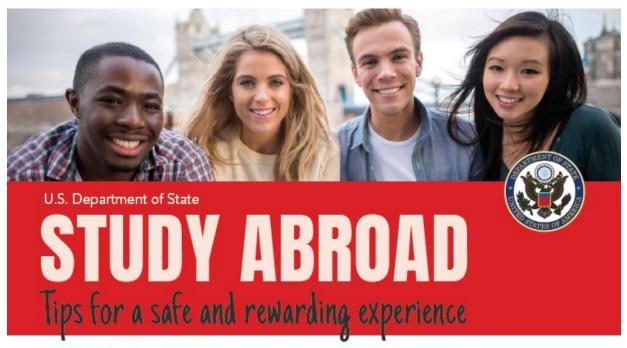
University Name Center Name FLAS Budget AY 20XX-XX P015B10XXXX

FUNDING TYPE	AMOUNT		
FLAS Allocation	\$195,000.00		
Remaining funds from last period*	\$7,350.00		
TOTAL funding available	\$202,350.00		
Funding spent this period	\$121,500.00		
Unspent funds (for carryover)	\$80,850.00		

\*not applicable to AY 1 of grant

	FLAS Institutional Payment (TUITION AND FEES)	FLAS Subsistence Allowance (STIPEND)	FLAS Summer Travel Award (if applicable)	FLAS TOTAL	University Contribution	Combined Total	Comments
Smith, John	\$10,000.00	\$5,000.00		\$15,000.00	\$0.00	\$15,000.00	
Doe, Jane	\$0.00	\$0.00		\$0.00	\$0.00	\$0.00	Declined undergraduate FLAS award
Jones, Bob	\$18,000.00	\$15,000.00		\$33,000.00	\$21,798.38	\$54,798.38	
Drew, Nancy	\$18,000.00	\$15,000.00		\$33,000.00	\$21,798.38	\$54,798.38	
Brown, Alice	\$18,000.00	\$15,000.00		\$33,000.00	\$21,798.38	\$54,798.38	
Miller, Dave	\$5,000.00	\$2,500.00		\$7,500.00	\$0.00	\$7,500.00	Received one- term undergraduate FLAS award
TOTAL	\$69,000.00	\$52,500.00		\$121,500.0 0	\$65,395.14	\$186,895.1 4	

## Appendix B – Student Abroad Handout



#### GET INFORMED M

 Learn about your destination and its unique travel requirements at travel.state.gov/destination.

#### GET REQUIRED DOCUMENTS 2

- Make sure your passport is valid for at least six months after your trip.
- · Apply for a visa if necessary.

#### STAY CONNECTED <

- Enroll in STEP to receive safety and security information, and to help us find you in an emergency. Visit step.state.gov.
- Leave emergency contact information, your school's information, and a copy of your passport with family or trusted friends.
- Inform your bank or credit card company that you will be traveling overseas.

#### GET INSURED! ☑

- Check whether your school or program provides medical insurance abroad.
- Consider purchasing additional health insurance, including medical evacuation, for any independent travel that is not covered by your school policy.
- Consult with your doctor to find out if any health checks or vaccinations are needed.
- Find out about the resources available in your country to treat any pre-existing conditions.
- Check the local laws to ensure that your medications are not considered illegal substances.

#### WHILE ABROAD V

- Follow local laws and customs wherever you go.
   If you are arrested or detained, ask authorities to contact the nearest U.S. embassy or consulate.
- . Don't violate the terms of your visa.
- Be cautious about political activities abroad.
   Different countries have different laws, including what types of activities (if any) are tolerated and any punishments or penalties.
- Guard your passport! Some countries require you to carry it with you at all times; others may allow you to carry a color photocopy. Secure it in a safe place when not in use.
- Be aware of your surroundings. Leave a situation if you don't feel safe.
- Watch out for scams. See travel.state.gov/scams.
- Be safe! Road accidents and drownings are two leading causes of death among U.S. citizens overseas.

#### IN AN EMERGENCY M

- If your passport is lost or stolen, contact the U.S. embassy or consulate for a replacement (for a fee) and see local authorities for a new visa.
- If there's a crisis where you are, check in with family and friends and update your status on social media to let everyone know you're okay.
- Follow @TravelGov on Twitter and Facebook, plus the social media accounts of the U.S. embassy in your country.

travel.state.gov TravelGov 7@TravelGov