Developing Hispanic-Serving Institutions (DHSI) Program Technical Assistance for Grantees

Njeri Clark, DHSI Program Lead and Competition Manager
Today’s Agenda

• Overview of the HSI Division
• Overview of the DHSI Program
• Allowable Activities
• Role of the Project Director
• Project Director Resources
• Project Director Challenges
• Considerations for the Project Director
• FAQs
• Helpful Tips for Project Directors
• Questions from the Audience
Overview of the Hispanic-Serving Institutions (HSI) Division
The Hispanic-Serving Institutions Division is a division within one of the many principal offices within the U.S. Department of Education. We are located at Washington, DC headquarters-LBJ Building. Our division is comprised of 6 team members and the Division Director, Stacey Slijepcevic.

Our 6 team members serve as Program Officers who manage a comprehensive grant portfolio based on locale. Our grantees have grants under one or more of the following programs: Developing Hispanic-Serving Institutions (DHSI), Promoting Post-baccalaureate Opportunities for Hispanic Americans (PPOHA), Hispanic-Serving Institutions STEM and Articulation (HSI STEM), and various FIPSE programs.

Our mission is to support Institutions of Higher Education that are educating the majority of Hispanic college students in America.
Hispanic-Serving Institutions Division

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Common Acronyms used at ED

DoEd or ED (U.S. Department of Education)

DHSI or Title V, Part A (Developing Hispanic-Serving Institutions Program)

PPOHA or Title V, Part B (Promoting Post-baccalaureate Opportunities for Hispanic Americans Program)

HSI STEM and Articulation or Title III, Part F (Hispanic-Serving Institutions Science, Technology, Engineering and Math and Articulation Program)

FIPSE (Fund for the Improvement of Postsecondary Education)-various programs like Basic Needs, Modeling and Simulation, Gang-related Youth, etc.

GAN (Grant Award Notification)

APR (Annual Performance Report)

IPR (Interim Performance Report)

OMB (Office of Management and Budget)

NCC (Non-Competing Continuation)

EDGAR (Education General Administrative Regulations)

PD (Project Director)

PO/PS (Program Officer or Program Specialist)
Overview of the DHSI Program
Purpose of the DHSI program

- To assist HSIs in expanding educational opportunities for, and improving the academic attainment of, Hispanic and low-income students.

DHSI Program grants also expand and enhance the academic offering, program quality, and institutional stability of colleges and universities that are educating the majority of Hispanic college students and helping large numbers of Hispanic students and low-income individuals complete postsecondary degrees.
Allowable Activities
What’s allowed?

- Student Support Services
- Curriculum Development
- Construction/Renovation
- Equipment purchases
- Online course development
- Peer Mentoring/tutoring
- Faculty development
- Project evaluation
- Endowment funds
- Outreach activities

- Stipends to students and staff
- Student and staff travel associated with project
- Costs related to meetings or conferences that are associated with the project (i.e., food, speaker fees, etc.)
- Furnishing student centers, labs, etc.
- Membership and subscription fees
- Other activities, if approved
What’s not allowed...

- Alcohol purchases
- Cost of extra-curricular activities unless tied directly to the grant
- Payment of salaries for officials with college-wide administrative authority
- Activities not approved in the proposal unless prior approval is received by the ED PS.

- If you have questionable costs, seek approval from your ED Program Officer. The expense may be approved if it is allowable under the funded program and directly relates to an objective of the grant.
The Role of the Project Director
The Role of the Project Director

Note: Certifying Official and PD cannot be the same person.

- Oversees the project and staff to ensure successful implementation of activities
- Communicates often with Program Officer
- Seeks guidance from Program Officer regarding allowable activities, questionable costs, budget modifications, key personnel, regulations, procedures, etc.
- Ensures project stays within budget and is compliant at all times.
- Communicates with Budget/Finance office within his or her institution to ensure financial coordination and compliance
- Submits any information requested from the Department of Education in a timely manner
- Creates Internal Controls Manual for the grant
- Ensures grant staff is trained on grant legislation, regulations, procedures, etc.
- Cooperates with Program Officer during site visits
- Ensures evaluation methods are sound and produce results
- Actively works to institutionalize components of the project
Project Director Resources

• 1. Regulations
• 2. OMB Uniform Guidance - 2CFR 200
• 3. Grantee Handbook
• 4. Program Website
• 5. GAN attachments
• 6. HSI Newsletter
• 7. Grantee Training Webinars
Regulations
a. Program Statutes

b. EDGAR- 34 CFR Parts 75, 77, 79, 82, 84, 86, 97, 98, and 99

c. EDGAR- 34 CFR Part 606

d. The OMB Guidelines to Agencies on Government-wide Debarment and Suspension- 2CFR 180, as adopted and amended in 2 CFR part 3474.

e. The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in 2 CFR part 200, as adopted and amended in 2 CFR part 3474. Uniform Guidance
Uniform Guidance

**Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards**

**Technical Assistance for ED Grantees**

**NEW Updates to the Uniform Guidance:**

- OMB Memo 16-18, signed June 20, 2016. The Office of Management and Budget (OMB) increased the thresholds for both the simplified acquisition costs and micro purchases. These thresholds are defined in Federal Acquisition Regulations (FAR) at 48 CFR Subpart 2.1 (Definitions) and are referenced in the Uniform Guidance. The definitions will be updated officially in the FAR in October 2018; however, the OMB Memo allows recipients of federal funds to use these definitions as of the date of the memo.
- Federal Register notice 80 FR 67261. Published on November 2, 2015. The Department of Education adopts the final regulations found in 2 CFR Part 200 (Uniform Guidance), except for 2 CFR 202.12(a) and 202.207(a). The Department also makes two changes to EDGAR Part 75 to (1) correct a citation in §75.150(b) and (2) add §75.250, which addresses the waiver for approval of pre-award costs.
- Federal Register notice 80 FR 64407. Published on September 10, 2015. The Council on Financial Assistance Reform (COFAR) made technical corrections to the Uniform Guidance, including a grace period of two fiscal years for non-Federal entities to implement changes to their procurement policies and procedures to align with the Uniform Guidance procurement standards.
- Federal Register notice 80 FR 45101. Published on July 22, 2015. Guidance for Reporting and Use of Information Concerning Recipient Integrity and Performance, which will be implemented on January 1, 2016. Additional information from ED is forthcoming.

The Uniform Guidance (2 CFR § 200) streamlines and consolidates government requirements for receiving and using federal awards so as to reduce administrative burden and improve outcomes. It was published in the Federal Register (79 Fed. Reg. 75871) on December 19, 2014, and became effective for new and continuation awards issued on or after December 26, 2014. Please note the new regulations do not affect grant awards prior to December 26, 2014, unless funds made available under those grants are carried forward into a new Federal fiscal year or a continuation grant.

This page is dedicated to assisting grantees with the implementation of the Uniform Guidance, including through ED-specific training.

**How Do I Find...**

- Student loans, forgiveness
- College accreditation
- Every Student Succeeds Act (ESSA)
- FERPA
- FAFSA

**Information About...**

- Transforming Teaching
- Family and Community Engagement
- Early Learning

**Related Topics**

- Key Policy Letters
so as to reduce administrative burden and improve outcomes. It was published in the Federal Register (79 Fed. Reg. 73871) on December 19, 2014, and became effective for new and continuation awards issued on or after December 26, 2014. Please note the new regulations do not affect grant funds awarded prior to December 26, 2014, unless funds made available under those grants are carried forward into a new Federal fiscal year or a continuation grant.

This page is dedicated to assisting grantees with the implementation of the Uniform Guidance, including through ED-specific training and resources as well as training material produced by OMB.

If you have questions about ED's implementation and training efforts related to the Uniform Guidance, please email them to UniformGrantGuidanceImplementation@ed.gov.

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### Regulations and Laws
- Uniform Guidance (2 CFR § 200)
- ED's Adoption of and Exceptions to the Uniform Guidance (PDF, 138KB)
- Education Department General Administrative Regulations (EDGAR)
- Program Laws and Guidance

### ED-Developed Training and Resources
- ED FAQs about the Uniform Guidance (PDF, 726KB)
  UPDATED DECEMBER 2016
- Overview Resources
- Topical Resources
  - Audit Requirements (MS PowerPoint, 564KB)
  - Cost Principles
  - Indirect Costs
  - Internal Controls
  - Procurement
  - Risk and Subaward Management
- Additional Administrative and Financial Guidance for Grantees

### OMB-Developed Training Resources
- OMB FAQs UPDATED SEPTEMBER 2015
- Council on Financial Assistance Reform—Crosswalks & Other Resources

### Contacts for More Information
- Your Education Program Contact (see Block 3 of your Grant Award Notification)
- Program Office Contacts
- Other ED Contacts

### ED-Specific Crosswalks
**EDGAR**
- Crosswalk between 34 CFR Part 74 and 2 CFR Part 200 (PDF, 922KB)
- Crosswalk between 34 CFR Part 80 and 2 CFR Part 200 (PDF, 1MB)

### OMB-CIRCULARS
- Educational Institutions: Crosswalk between 2 CFR Part 220 (OMB Circular A-21) and 2 CFR Part 200 (MS Word, 836KB)
- States, Local, and Indian Tribal Governments: Crosswalk between 2 CFR Part 225 (OMB Circular A-11) and 2 CFR Part 200 (PDF, 830KB)
$200.326 Contract provisions.

PERFORMANCE AND FINANCIAL MONITORING AND REPORTING
$200.327 Financial reporting.
$200.328 Monitoring and reporting program performance.
$200.329 Reporting on real property.

SUBRECIPIENT MONITORING AND MANAGEMENT
$200.330 Subrecipient and contractor determinations.
$200.331 Requirements for pass-through entities.
$200.332 Fixed amount subawards.

RECORD RETENTION AND ACCESS
$200.333 Retention requirements for records.
$200.334 Requests for transfer of records.
$200.335 Methods for collection, transmission and storage of information.
$200.336 Access to records.
$200.337 Restrictions on public access to records.

REMEDIES FOR NONCOMPLIANCE
$200.338 Remedies for noncompliance.
$200.339 Termination.
$200.340 Notification of termination requirement.
$200.341 Opportunities to object, hearings and appeals.
$200.342 Effects of suspension and termination.

CLOSEOUT
$200.343 Closeout.

POST-CLOSEOUT ADJUSTMENTS AND CONTINUING RESPONSIBILITIES
$200.344 Post-closeout adjustments and continuing...
| §200.416 | Cost allocation plans and indirect cost proposals. |
| §200.417 | Interagency service. |

**SPECIAL CONSIDERATIONS FOR INSTITUTIONS OF HIGHER EDUCATION**

| §200.418 | Costs incurred by states and local governments. |
| §200.419 | Cost accounting standards and disclosure statement. |

**GENERAL PROVISIONS FOR SELECTED ITEMS OF COST**

| §200.420 | Considerations for selected items of cost. |
| §200.421 | Advertising and public relations. |
| §200.422 | Advisory councils. |
| §200.423 | Alcoholic beverages. |
| §200.424 | Alumni/ae activities. |
| §200.425 | Audit services. |
| §200.426 | Bad debts. |
| §200.427 | Bonding costs. |
| §200.428 | Collections of improper payments. |
| §200.429 | Commencement and convocation costs. |
| §200.430 | Compensation—personal services. |
| §200.431 | Compensation—fringe benefits. |
| §200.432 | Conferences. |
| §200.433 | Contingency provisions. |
| §200.434 | Contributions and donations. |
| §200.435 | Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements. |
| §200.436 | Depreciation. |
§ 200.450 Lobbying.
§ 200.451 Losses on other awards or contracts.
§ 200.452 Maintenance and repair costs.
§ 200.453 Materials and supplies costs, including costs of computing devices.
§ 200.454 Memberships, subscriptions, and professional activity costs.
§ 200.455 Organization costs.
§ 200.456 Participant support costs.
§ 200.457 Plant and security costs.
§ 200.458 Pre-award costs.
§ 200.459 Professional service costs.
§ 200.460 Proposal costs.
§ 200.461 Publication and printing costs.
§ 200.462 Rearrangement and reconversion costs.
§ 200.463 Recruiting costs.
§ 200.464 Relocation costs of employees.
§ 200.465 Rental costs of real property and equipment.
§ 200.466 Scholarships and student aid costs.
§ 200.467 Selling and marketing costs.
§ 200.468 Specialized service facilities.
§ 200.469 Student activity costs.
§ 200.470 Taxes (including Value Added Tax).
§ 200.471 Termination costs.
§ 200.472 Training and education costs.
§ 200.473 Transportation costs.
§200.432 Conferences.
A conference is defined as a meeting, retreat, seminar, symposium, workshop or event whose primary purpose is the dissemination of technical information beyond the non-Federal entity and is necessary and reasonable for successful performance under the Federal award. **Allowable conference costs paid by the non-Federal entity as a sponsor or host of the conference may include rental of facilities, speakers' fees, costs of meals and refreshments, local transportation, and other items incidental to such conferences unless further restricted by the terms and conditions of the Federal award.**
§200.442 Fund raising and investment management costs.
(a) Costs of organized fund raising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions are unallowable. Fund raising costs for the purposes of meeting the Federal program objectives are allowable with prior written approval from the Federal awarding agency.
Grantee Handbook
Hispanic-Serving Institutions (HSI) Division
Grantee Handbook
October 2023
Table of Contents

WELCOME LETTER ............................................................... 3
CONTACT INFORMATION ..................................................... 4
GENERAL INFORMATION .................................................... 5
USEFUL WEBSITES ............................................................ 6
GRANTS MANAGEMENT ....................................................... 7
HIERARCHY OF AUTHORITY (EDGAR, UNIFORM GUIDANCE, GAN) ............. 7
PERFORMANCE REPORTS ................................................... 11
FINANCIAL REPORTING AND DRAWDOWNS ................................ 12
INTERNAL CONTROL MANUAL ............................................ 12
TIME & EFFORT ............................................................... 13
PRIOR APPROVALS ........................................................... 13
CHANGES IN KEY PERSONNEL .......................................... 14
RECORD KEEPING ............................................................ 15
TRAVEL ..................................................................... 16
CONTRACTING .................................................................. 16
CONSTRUCTION AND RENOVATION ...................................... 17
EQUIPMENT AND SUPPLIES .............................................. 17
MEALS AND REFRESHMENTS ............................................. 18
ENDOWMENTS ................................................................. 18
REVISION OF BUDGET AND PROGRAM PLANS ............................... 19
PRE-AWARD COSTS ........................................................... 19
CARRYOVER FUNDS .......................................................... 19
BUDGET TRANSFERS AND CHANGES .................................... 19
NO-COST TIME EXTENSIONS .............................................. 20
AUDITS AND INTERNAL CONTROLS ...................................... 20
Program Website

Developing Hispanic-Serving Institutions Program - Title V (ed.gov)
Developing Hispanic-Serving Institutions Program - Title V

Purpose

Program Office: Institutional Service
CFDA Number: 84.031S
Program Type: Discretionary/Competitive Grants
Also Known As: DHSI Program; Title Five; Title V, Part A
Program Contact: Njeri Clark

How Do I Find...
- Student loans, forgiveness
- Higher Education Rulemaking
- College accreditation
- Every Student Succeeds Act (ESSA)
- FERPA
- FAFSA
- 1098, tax forms

Information About...
- Elevating Teaching
- Early Learning
- Engage Every Student
- Unlocking Career Success
- Cybersecurity

What's New

New
The DHSI program awarded 110 new awards in FY 23! 46 applicants were funded down the FY 22 slate
Performance

Annual Performance Report

Grantees are required to submit two types of performance reports:

1. Interim Performance Report, which is due after the first six months of the grant.
2. Annual Performance Report (APR). The APR is available to grantees October 1 of each calendar year, and closes 90 days thereafter. To review the reporting requirement for Title III and Title V Programs, request access to an interactive training site under the training tab located on IS’ Information Management Performance System Portal. Once there you may select the requirements for each Title III and Title V program based on the institutional type (two-year or four-year). This site is also available to grantees for training purposes and includes an APR user’s manual.

To gain access to the APR project directors need the institution’s Unit ID, PR Award ID, and a unique password provided by the Institutional Service. Passwords are e-mailed to the grantee project director designated on the grant award notification document 30 days before the collection period begins. Project directors of Title III and Title V grants are responsible for completing and managing the content of their respective annual report.

Note: If you are a project director and have responsibility for completing the annual report for your institution, please be sure you are designated on the official grant award notification and your e-mail and telephone number are listed correctly in the G5 database. Contact your program officer if you have questions.

FINAL PERFORMANCE REPORT

The online system will generate a final report from grantees’ individual annual reports for each grant ending September 30 of the
Developing Hispanic-Serving Institutions Program - Title V

Developing Hispanic-Serving Institutions Program

- Purpose
- Eligibility
- Applicant Info
- Awards
- Performance

Funding Status
- Laws, Regs, & Guidance
- Resources
- FAQs
- Contacts

Office of Postsecondary Education Home

Legislation, Regulations, and Guidance

Developing Hispanic-Serving Institutions Program

- Title V, Part A of the Higher Education Act, as amended (20 U.S.C. 1101-1101d; 1103-1103g)

Regulations

- 34 CFR Part 606
- The Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 74, 75, 77, 79, 82, 84, 85, 86, 97, 98, and 99 apply to both programs.

Institutional Service Home
Grant Award Notification (GAN) Attachments

- The G5 Payment Module
- Financial and Performance Reports
- Overview of Single Audit Requirements
- Approval of Program Income
- Trafficking in Persons
- Reporting Prime Awardee Executive Compensation Data
- Specific Conditions for Disclosing Federal Funding in Public Announcements
- Prohibition of Text Messaging and Emailing While Driving During Official Federal Grant Business
- Registration of DUNS Number in SAM
- System for Award Management (SAM) Requirements
- Memorandum Regarding the Use of Grant Funds for Meetings and Conferences
- Responsibilities Associated with Managing Federal Funds
- Financial Management System Requirements
- Cash Drawdowns from the G5 Grants System
Sign up for the HSI Division Newsletter.
Online Grantee Training

- Webinars can be found on the DHSI Website
- There’s a grantee training portal on the Department’s website. (Uniform Guidance Page)
Training Resources

- Online Computer-based Grants Training Courses

Other Resources

Office of Federal Financial Management: OFFM in the Executive Branch develops and implements the coordinated policy with Federal Chief Financial Officers to assure that Federal financial management practices support effective delivery of service across the United States Federal government. This website houses the 2020 Compliance Supplement, which is a thorough Federal government guide created by OMB and used in auditing Federal assistance and federal grant programs, as well as their respective recipients.

Discretionary Grantmaking at ED: This publication provides a nontechnical summary of ED’s discretionary grants process and the statutes and regulations that govern it. This document describes how grant programs that are created by Congress are administered.
### Pre-Award Training

<table>
<thead>
<tr>
<th>English</th>
<th>Español</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensuring Equitable Opportunities Under the GEPA 427</td>
<td></td>
</tr>
<tr>
<td>Human Subjects Research</td>
<td></td>
</tr>
<tr>
<td>Writing Competitive Grant Applications</td>
<td></td>
</tr>
<tr>
<td>Introduction to Being an Effective Peer Reviewer</td>
<td></td>
</tr>
<tr>
<td>Introduction to Evidence for Peer Reviewers</td>
<td></td>
</tr>
</tbody>
</table>

### Post-Award Training

<table>
<thead>
<tr>
<th>English</th>
<th>Español</th>
</tr>
</thead>
<tbody>
<tr>
<td>Welcome to ED Grants</td>
<td>Administración de Subvenciones Discrecionales</td>
</tr>
<tr>
<td>Discretionary Grants Administration</td>
<td></td>
</tr>
<tr>
<td>Formula Grants Training</td>
<td>Capacitación sobre Subvenciones de Fórmula</td>
</tr>
<tr>
<td>Allowable Costs and Activities</td>
<td>Costos y Actividades Admisibles</td>
</tr>
<tr>
<td>Formula Grants Training</td>
<td>Capacitación sobre Subvenciones de Fórmula</td>
</tr>
<tr>
<td>-----------------------------------------</td>
<td>--------------------------------------------</td>
</tr>
<tr>
<td>Allowable Costs and Activities</td>
<td>Costos y Actividades Admisibles</td>
</tr>
<tr>
<td>Internal Controls</td>
<td>Controles Internos</td>
</tr>
<tr>
<td>Indirect Cost</td>
<td></td>
</tr>
<tr>
<td>Cash Management</td>
<td>Administración de Efectivo</td>
</tr>
<tr>
<td>Subrecipient Monitoring</td>
<td>Monitorización de Beneficiarios Secundarios</td>
</tr>
<tr>
<td>Federal Funding Accountability and Transparency Act (FFATA)</td>
<td>Federal Funding Accountability and Transparency Act (FFATA) - Español</td>
</tr>
<tr>
<td>Build America, Buy America Act (BABAA)</td>
<td>Build America, Buy America (BABAA) - Español</td>
</tr>
<tr>
<td>Managing the Procurement Process</td>
<td>Administración del Proceso de Adquisición</td>
</tr>
</tbody>
</table>

**Training Courses:**

**Ensuring Equitable Opportunities Under the GEPA Section 427**

Use this link to launch the Ensuring Equitable Opportunities Under the GEPA Section 427 training course. **Course Description:** This 30 minute course will provide for how an applicant can ensure equitable access to, and participation in, its Federally-assisted programs for all beneficiaries.
Increased probability of flaws in the project design if application was not written in-house

Lack of understanding of grant policies/Dept. of ED policies and regs

Poor management of the grant project

Changes to budget, implementation plan, etc.

Delays in implementation

The new virtual environment

Communication and Clarifying expectations within the team and/or other departments

Lack of buy-in from the administration

Sustainability/institutionalization
What are some of the challenges you have experienced?
Other considerations for the Project Director...
Does the grant have its own Internal Controls Manual or SOP document?
Table of Contents

- PROJECT ABSTRACT .................................................. 1
- ORGANIZATION AND PERSONNEL .................................. 2
- DIRECTORY OF PERSONNEL ........................................... 4
- DHSI PROGRAM REGULATIONS AND UNIFORM GUIDANCE .......... 5
- DEPT. OF EDUCATION PERFORMANCE REPORTS .................. 6
- JOB DESCRIPTIONS
  - Associate Program Manager ........................................... 7
  - Activity Director .......................................................... 9
  - Administrative Assistant ............................................... 14
  - Project Director ............................................................ 19
  - Technology/Web Assistant ............................................... 24
  - Studio Classroom Specialist ............................................ 29
  - Systems Research Analyst .............................................. 34
  - Monthly Progress Report ............................................... 42
- Staff Time & Effort Report .............................................. 44
- Title V Undergraduate Time & Effort Report ......................... 45
- Peer Mentor Time & Effort Report ..................................... 46
- HIRING PROCESS .......................................................... 47
  - Faculty ........................................................................ 47
  - Students ....................................................................... 48
  - Personnel Status Form .................................................. 50
  - Student Employment Form ............................................. 51
- W-4 Form ..................................................................... 52
- I-9 Form ..................................................................... 53
- PROCEDURES FOR EXPENDITURES ................................ 55
  - Purchase Requisitions .................................................. 58
  - Check Requests ............................................................ 59
  - Check Request Form ..................................................... 60
  - Purchase Order Form .................................................... 61
- EQUIPMENT MANAGEMENT ............................................. 62
  - Equipment Inventory Form ............................................. 63
  - Equipment Inventory Record ........................................... 64
- TRAVEL REGULATION AND POLICY .............................. 65
  - Travel Request/Reimbursement Form ............................... 66
- STIPENDS .................................................................... 67
  - Stipend Request Form .................................................... 68
  - W-9 Form .................................................................... 69
How do you manage your equipment?

Equipment is defined as an item that has a cost $\geq$ $5000.00 and has a useful life of more than one year. Please include computers, laptops, tablets, printers, etc. as equipment although the per unit cost may be less than $5000.00

2 CFR Part 200.313
Publications and Press Releases

**PUBLICATIONS**

- Grantees, in carrying out their grants, may plan to publish a variety of materials. If producing materials as part of grant activities, grantee must include in any such materials the disclaimer in **EDGAR §75.620** that states:

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

**PRESS RELEASES**

- When issuing statements, press releases, requests for proposals, bid solicitations and other documents describing projects or programs funded in whole or in part with Federal money, U. S. Department of shall clearly state:

- The percentage of the total costs of the program or project which will be financed with Federal money;

- The dollar amount of Federal funds for the project or program; and

- The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.
At the end of your Performance Period

Closing out your grant

• Project Director will receive a close out notification letter on October 1.
• 90-day Liquidation period-usually Oct. 1- Dec. 31
  • Grantee may continue to draw down for liquidating obligations during the 90-day period immediately following the project end date. Grantee may not incur any new obligations during the 90-day liquidation period.
• Final Performance Report due at next cycle
• Title to equipment and supplies acquired by a recipient with Federal funds shall vest with the recipient.
• Financial records, supporting documents, statistical records, and all other records pertinent to award shall be retained for a period of three (3) years from the date of submission of the Final Performance report.
• If you have endowment activities under this grant award, you must continue to submit annual financial reports to the Department for a time period after the grant has ended.
Frequently Asked Questions

1. Do we need approval to modify our budget? If budget changes are 10% or more of your annual budget, you DO need approval from your ED PS to make the modification. Also, when you move money from training, you need prior approval.

2. Do we have to implement the activities as proposed in the application? We want you to adhere to the fidelity of the proposal, but if changes need to be made, contact your ED Program Officer.

3. What if we can’t find staff to fill all the positions included in the application? Contact your ED PO for recommendations. He or she will work with you to modify your activities, budget, etc.

4. Can I serve as the Certifying Official and Project Director? No. There must be checks and balances.

5. How long do I have to hire a Project Director? There must be an interim PD put in place immediately. If you do not hire a PD in 90 days, you may be deemed a high-risk grantee which has implications.

6. Can the Dean of Academic Affairs serve as Project Director and be paid from the grant? The Dean cannot be paid from the grant since he has college-wide administrative authority, but he or she can serve with “0.00” salary on the budget chart.

7. Are indirect costs allowed? No

8. Can we pay for student stipends? Yes, as long as the expense connects to the grant objective.

9. Can we pay for student travel? Yes, as long as the expense connects to the grant objective.

10. Can we pay for international travel for faculty to attend a conference? Yes, as long as the expense connects to the grant objective.

11. Can we give students gift cards? Yes, as long as the expense connects to the grant objective.

12. What happens if we lose our HSI status during the performance period? Our practice has been that the grantee retains eligibility for the entire performance period.
Helpful Tips

• Use your resources!
• Include the PR Award number on all emails and correspondence.
• When in doubt, ask your PS.
• Do not work in a silo. Be sure your team as well as other departments and leadership know about your project and the great work you are doing.
• Work closely with your evaluator.
• Attend meetings, conferences, and other grant related events.
• Share your accomplishments with the Department.
Important Dates and Information

Thank you