

Corporation for National and Community Service

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

Purpose: This policy is designed to maintain the integrity of the CNCS grant application review and selection process and ensure consistency in all staff communication with grantees, applicants, and potential applicants during GARP.

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

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

Originating Office: Office of Grants Policy and Operations

Approved By:



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What is the purpose of this policy?

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

What is the scope of this policy?

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

This policy applies to all CNCS grant competitions that include new or re-competing applications for which the review process includes External Review, Staff Review, or both, and that result in new or re-competing grant awards, including cooperative agreements. In addition, this policy applies to any communication related to the grant review and selection process for a given competition.

This policy does not apply to processes that result in continuation awards; non-competitive grants and awards, including AmeriCorps VISTA cost share awards; memoranda of understanding or agreement; and AmeriCorps NCCC sponsor agreements or contracts.

To whom does this policy apply?

This policy applies to all CNCS staff, and in particular, those who participate in GARP for grant competitions. This policy is also applicable to all program directors and managers.

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

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

What is the rationale for this policy?

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

How is staff communication with existing grantees handled?

CNCS staff will continue to support, manage, and monitor current grants in accordance with all applicable laws and regulations. Staff who conduct check-ins with current grantees (via in-person or phone conversations) and conduct monitoring visits may continue to do so during

GARP. In both cases, communications should not discuss new applications or the grant process; it should only cover standard, existing grantee content and provide the standard level of support.

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

How is communication handled with all applicants and potential applicants?

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

- The *Notice* and Application Instructions: published on the CNCS website and made available in accessible format upon request to accommodate persons with special needs
- Training and Technical Assistance (TTA): publically announced and provided to potential applicants via conference calls prior to the application deadline
- Frequently Asked Questions (FAQs): published for most competitions
- Supplemental resources for applicants: materials published on the CNCS website that provide applicants with supplemental information regarding the program and its application
- Point of contact: dedicated email address for each competition publicly announced in the *Notice*; a dedicated voicemail number may also be provided
- eGrants NOFA: announced when it is open to the public for electronic application submission
- National Service Hotline: contact information and business hours are shared with applicants to provide them support for submission of their applications via eGrants
- Press Releases: distributed as part of each *Notice* outreach/communication plan

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

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

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

OGC clearance is not required to explain the *Notice* to applicants; however, the person or office planning to conduct a meeting should consult with OGC prior to the meeting, particularly in the case of high-profile meetings involving program directors, the CEO, and/or other senior managers.

Staff may conduct Training and Technical Assistance calls prior to the application deadline to review application instructions, content and requirements of the *Notice*, and CNCS policies applicable to the specific competition. New questions that arise from such calls, and answers given in response to those questions, should be made available to all parties by revising and reposting the FAQs. As appropriate, responses to questions from emails and mailboxes will be added to the FAQs, and must be cleared by OGC prior to posting. Responses to inquiries must rigorously adhere to a practice of responding to all questions by referencing the *Notice*, the FAQs, CNCS regulations or policy, or applicable law.

During GARP, communications related to a specific application between program and/or grant staff and applicants may take place as part of the Applicant Clarification process, which is the last stage of Staff Review. The purpose of Applicant Clarification is to request clarifications from the list of applicants recommended for clarification on certain aspects of the application in order to assist CNCS staff in making final funding decisions.

During all applicant clarification communications, CNCS staff must adhere to the programmatic and budgetary components identified and approved by the Program Office and/or the Grant Office as needing to be clarified.

Can targeted outreach be conducted?

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

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

What are the requirements for documenting communications?

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

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

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

What communication is not allowed?

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

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

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

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

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

During GARP, it is especially important to vet all invitations to senior staff to participate in meetings, conferences, and other events through OGC, particularly in cases of high-profile meetings involving program directors, the CEO, and other senior managers. If participation is permitted, staff should not answer questions about or discuss the status or content of pending applications, or results from the review process, or any other information about the competition that is not available to the public.

What is the communication plan related to this policy?

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

This policy will be published on www.nationalservice.gov, communicated to prospective applicants during training and technical assistance calls for each grant competition, included in Frequently Asked Questions related to each grant competition, and referenced in instances where an applicant or grantee may request certain information relating to a grant competition.

What is the training plan related to this policy?

As needed, OGPO will update the policy orientation session available to all CNCS staff through the Learning Management System, in order to ensure alignment with policy revisions. This training is particularly designed for staff who participates in GARP for grant competitions, including program directors and senior managers.

OGPO will develop and deliver a presentation to leadership and special advisors, in particular those new to the agency, when the first NOFO for a fiscal year is released.

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