Development Office
Department of Cultural Affairs
City of New York

830 Fifth Avenue New York, New York 10021 (212) 360-8295

FEDERAL FUNDING:

THE PROCESS

AND

INFORMATION RESOURCES

Henry Geldzahler Commissioner

Dennis Paul Development Officer This information packet was prepared by the Development Office, Department of Cultural Affairs, City of New York, for use in the workshop "Funding for Accessibility: Federal, State and Foundation Sources." The workshop is presented by Exploring Cultural Opportunities for the Handicapped (ECOH), a statewide program of the Council for the Arts in Westchester.

ECOH services are made possible, in part, with assistance from the New York State Council on the Arts, the, National Endowment for the Arts, and Westchester County government, through the Federal Comprehensive Employment and Training Act (CETA).

Additional support is received from Mobil and the Westchester Community Foundation.

TABLE OF CONTENTS

		Page
I.	Understanding the Legislative Process	1
II.	How the Federal Government Dispenses the Money	7
III.	OMB Circulars: A-95	13
IV.	Funding News: Catalog of Federal Domestic Assistance	e 14
V.	Reading Regulations	21
VI.	Funding Definitions	27
VII.	How to Ask For Federal Funding	32
VIII.	Application Review: How it's Done	37
IX.	Checklist for Proposal Writers	46
Х.	Fund Raising Checklist	47
XI.	Funding Source Fact Sheet	48
XII.	Funding Source Contact Sheet	49
XIII.	Funding Bibliography	50
XIV.	Sample Government Information Request Form Letter	59
¥17	Eleven Points to Effective Lobbying	60

Although a number of these articles have been compiled for a future publication, Public Funding Opportunities in Education for Cultural Organizations, they have been reprinted in this information packet because of the general revelance of their content.

Lorent for the color of the second for the color of the c

This article originally appeared in the 1978 Federal Funding Guide for Elementary and Secondary Education and has been reprinted with permission from the Education Funding Research Council, 752 National Press Building, N.W. Washington, D.C. 20045

Understanding the Legislative Process

An understanding of the legislative and administrative procedure which funnels federal dollars to schools is necessary for anyone in the federal aid field. This chapter takes a brief look at this process.

The Making Of A Law

Congress is the starting point for all federal aid. The first step is the introduction of a bill by individual Senators or Congressmen. Sometimes the members of Congress will jointly sponsor a particular piece of legislation — bills with scores of "co-sponsors" in both branches are a common occurrence. After a bill is introduced it is referred to a committee. In the House most education legislation is sent to the House Labor and Education Committee which in turn will probably assign the bill to one of the two subcommittees on education.

In the Senate education legislation is generally forwarded to the Labor and Public Welfare Committee and then to the subcommittee on Education. The committee work includes the holding of public hearings, and the long and tedious task of reshaping the bill to make it acceptable to a committee majority. Most legislation reported out of the committee to the full House and Senate for a vote has generally undergone considerable revision. The final legislation may actually embody the major or essential elements of many different bills that have been introduced on the same subject.

Rarely do the House and Senate pass identical bills on the first go-around. An example of this during 1976 was the Education Amendments of 1976. In May the House passed two bills - H.R. 12835 and H.R. 12851 which covered most of the education areas also covered under one bill in the Senate - S. 2657 which passed in late August. The two House bills and the Senate measure covered the same general categories but were different in many important respects. When this happens - which is most of the time - the legislation is given to a small number of Senators and Congressmen to resolve the differences. This group is called a conference committee. It is usually comprised of the senior Democrats and Republicans in those committees that handled the original legislation.

Compromise is the key element in the deliberations of the conference committee. A majority of the members must agree on all matters before it can make its report. Once agreement is reached — and sometimes this never happens — the compromise bill is sent to both branches for a vote. If both branches approve the bill — without change — it is sent to the President for signature. If any change is made in the bill the conference committee procedure begins again.

In the case of the Education Amendments of 1976 the House and Senate conferees began meeting on September 1st under pressure to conclude their deliberation quickly. Congress was due to adjourn on October 2 because of the November election. The extensiveness of the areas covered and the complexity of the bills forced conferees to spend many hours trying to resolve the differences. The conferees accepted the Senate title — The

Education Amendments of 1976 - but the final compromise version agreed to at a session that lasted until 4 o'clock in the morning on September 27th was quite different from either of the original three bills. The compromise bill quickly passed both the Senate and House before the October 2nd deadline. It was signed into law by the President on October 13th and became Public Law 94-482.

If the President disagrees with any piece of legislation which is passed he may veto it and return it to Congress. A two-thirds vote in both the House and Senate is needed to override the veto. The veto is most likely to be exercised when the President is of a different political party from the Congress. This was the case two years ago when President Ford, a Republican, was dealing with a Democrat controlled Congress. The result was more than 50 pieces of legislation vetoed by President Ford. One of the bills vetoed by President Ford was the Labor-HEW appropriation bill containing funds for education. Largely through the lobbying efforts of the education community the veto of this bill was overridden. However, there were only a handful of instances when the Democratic Congress overrode President Ford's vetoes.

Authorization vis-a-vis Appropriation

The budgetary process of the federal government is confusing at best. It is totally muddled unless you understand the difference between authorization and appropriation and the meaning of some other budget terms. Legislation that creates new programs and projects or continues existing ones is known as <u>authorization legislation</u>. Authorization legislation creates and establishes the program. It also establishes a funding ceiling — the maximum dollar amount — that may be spent on the program.

But the money to run the program must come from passage of another measure called an appropriation bill. All money and appropriation bills are handled by the two powerful Appropriation Committees and their sub-committees in both the House and Senate.

The different bills - authorization and appropriation - must be passed by Congress before one cent flows to a program. Congress seldom - if ever - spends as much money on a program as is authorized. If all the education legislation now on the books were <u>fully funded</u> - that is money made available to the authorization limit - federal spending for education would at least triple.

All appropriation legislation originates in the House. The usual procedure is for the President to send his proposed budget to the Congress sometime in January for the new fiscal year that starts on October 1.

Budgetary Process

The federal government a year ago started a new budgetary process that shifted the fiscal year and strengthens the role of Congress in appropriating funds.

For the past three years the federal government slowly phased into this new budgetary process which shifted the federal government onto an October 1st to September 30th fiscal year.

A year ago all phases of the new reform legislation - Congressional Budget and Impoundment Control Act of 1974 (P.L. 93-344) - were in place. The main thrust of the reform act is to force Congress to examine and formulate the federal budget as a whole instead of making decisions on such matters as appropriations, taxes, and the federal deficit, on an unrelated, piecemeal basis.

Here are some of the highlights of the reform measures:

Shifts the federal government onto an October 1 -- September 30 fiscal year.

Establishes a Congressional Budget Office (CBO) to serve as the Hill counterpart to the executive's Office of Management and Budget (OMB).

Strengthens congressional discipline to assure speedy action on all appropriations bills.

Sets up new procedures for dealing with presidential impoundment of funds which makes it much more difficult for the President to withhold appropriated monies.

This new law should eliminate some of the guess work on federal aid to education which has plagued budget planners in the past.

There is a provision in the legislation which significantly affects the appropriation process and is of prime importance to schools; it sets May 15th as the deadline for all congressional committees to report those bills that provide new spending authority for the new fiscal year. The idea here is to give Congress plenty of time - until the 7th day after Labor Day - to complete action on those appropriations needed to implement legislation.

Here is how the Congressional timetable works:

- January 18-- or 15 days after Congress convenes the President submits his proposed budget
- March 15 -- Committees and joint committees submit reports to Budget Committees
- April 1 -- Congressional Budget Office submits report to Budget Committees
- April 15 -- Budget Committees report first concurrent resolution on the budget to their houses
- May 15 -- Committees report bills and resolutions authorizing new budget authority
- May 15 -- Congress completes action on first concurrent resolution on the budget

7th day after Labor Day -- Congress completes action on all appropriations bills

- September 15 -- Congress completes action on second required concurrent resolution on the budget
- September 25 -- Congress completes action on reconciliation bill or resolution, or both, implementing second required concurrent resolution
- October 1 -- Fiscal year begins.

The budgetary process really starts with the submission by the President of the administration's proposed budget. This year - 1978 - President Carter submitted his proposed fiscal 1979 budget to Congress on January 23, 1978.

The President's transmittal of his budget proposals to the Congress each year is the result of many months of planning and analysis throughout the executive branch. Formulation of President Ford's proposed, 1978 budget actually began in the spring of 1976.

Congress begins its review with the submission in January of the proposed budget for the fiscal year that starts on October 1st. The Congress, of course, has the power to eliminate or add programs not requested by the President.

Congressional consideration of requests for appropriations and for changes in revenue laws follows an established pattern. They are considered first in the House of Representatives, where the Ways and Means Committee reviews proposed revenue measures and the Appropriations Committee, through its subcommittees, studies the proposals for appropriations. These committees then recommend the action to be taken by the House of Representatives. As part of the budgets are approved by the House, the appropriations and tax bills are forwarded to the Senate, where a similar process is followed.

When action on appropriations is not completed by the beginning of the fiscal year, the Congress may enact a continuing resolution to provide authority for the affected agencies to continue operations until their regular appropriations are approved.

The new Congressional Budget Act has established a firm schedule for the congressional authorization and appropriation process. When fully in effect the new Act will require that by April 1 the House and Senate Budget Committees receive reports on budget estimates from each Appropriations Committee of Congress, as well as a fiscal policy report from the Congressional Budget Office. By May 15, the Budget Committees will adopt a concurrent budget resolution containing budget targets. By September 15, the Congress will complete action on setting budget ceilings; and by September 25, Congress will complete action on any required reconciliation bill or resolution.

Requests for money that come to Congress after the passage of the regular appropriation bills are called supplemental appropriations. This is merely a request for additional funds not covered in the regular appropriation bill. Supplemental appropriations are generally initiated towards the end of the fiscal year to cover unexpected expenditures by federal agencies.

Impoundment

The reform legislation prescribes two procedures for Congress to deal with presidential impoundments, one for "deferrals" or impoundments which simply delay the spending of funds, and a tougher measure for "rescissions," i.e. those which seek to cut or terminate a program. If the President were to determine that all or part of a program's budget should be cut, he would submit to Congress a special message requesting a rescission of that program's budget authority. Unless both the House and Senate passed the rescission bill within 45 days, the executive would be forced to spend the money.

For simple deferrals the process is reversed. The President is still required to submit a special message to Congress but, unless either House passes an "impoundment resolution" disapproving the spending delay, the funds could be withheld indefinitely.

The legislation also establishes procedures to bring most forms of new backdoor spending programs under the appropriations process. The types of programs affected fall into three categories: those which provide contract authority (to enter into contract in advance of appropriations); and those which provide borrowing authority (to incur indebtedness in advance of appropriations); and those which provide entitlement authority (to obligate the U.S. government to make payments to eligible programs recipients in advance of appropriations).

Exempt from the new backdoor spending procedures are General Revenue Sharing, all Social Security trust funds, trust funds that received 90 percent or more of their financing from designated taxes rather than from general revenues, and insured and guaranteed loans.

start is to obtain all the appropriate background documents; the legislation

How the Federal Government Dispenses the Money

The federal government uses a variety of methods to dispense money. This chapter examines those methods which are mostly likely to be used in distributing funds either directly or indirectly to local school districts. A description of the different methods is given along with an explanation of the procedures used by the federal agency in the selection process.

Covered in this chapter are the following:

Discretionary money Request for Proposal (RFP)

Project grants Basic Ordering Agreement (BOA)

Formula money Request for Qualifications (RFQ)

Block grants Sole Source Contracts

Contracts Unsolicited proposals

Discretionary money is used to fund project grants which are also commonly referred to as categorical grants. Discretionary money is appropriated to a government agency to be dispensed usually through some competitive selection process. The federal agency exercises its discretion in dispensing such money as project grants. These are competitive by their very nature. The funding agency judges the relative worthiness and importance of each project grant application submitted before it allocates the money in accordance with the constraints of the program's authorizing legislation.

In a project grant competition, every school district, every unit of general local government, every nonprofit agency, institution or organization is in direct competition with every other similar entity which chooses to submit an application. (A profit-making organization may compete in a grants competition, but the award will be made in the form of a contract since a fee (profit) is involved.) A local school district, therefore, would not compete against a state education agency for the same grant.

The competition for project grants, whether in the field of education or community development or public works or mass transit, gets keener as the amount of federal money available gets tighter.

Then how does one get the edge in this type of competition? One way to start is to obtain all the appropriate background documents: the legislation itself, followed by the regulations, guidelines and funding criteria, which are provided in the Federal Register. Each agency is required by the Federal Administrative Procedures Act to publish all the information it can to assist potential applicants. The Federal Register is the vehicle by which the agencies make this information available, albeit in somewhat legalistic jargon. Regulations appearing there are amendments to the Code of Federal Regulations (CFR).

This article originally appeared in the 1979 Federal Funding Guide for Elementary and Secondary Education and has been reprinted with permission from the Education Funding Research Council, 752 National Press Building, N.W. Washington, D.C. 20045

In addition to proposed regulations, issued for comments, the <u>Federal</u> Register also contains final regulations, application guidelines, funding criteria and deadline dates. Combined, these several documents provide the framework for the development of competitive success.

An important factor, sometimes overlooked, is the established application deadline date (these range from 30 to 120 days following publication in the Federal Register). Many worthy projects have never been given the benefit of review and evaluation simply because the closing date — and time — for receipt of those applications had already passed before the applications reached the funding agency. For instance, the U.S. Office of Education requires that applications coming to the national office be received no later than 4:00 p.m. on the established date — or be postmarked no later than five days prior to the deadline. Any applications not meeting these requirements are automatically eliminated.

Applicants should also know whether the application/proposal is to be submitted to the agency's national headquarters or to a regional office of that agency and whether coordination with a state, interstate or regional body is required.

Make sure <u>all</u> the paper work required is completed and submitted, including preapplications, prospectuses, summaries, environmental impact statement, assurances, proof of A-95 clearinghouse review where appropriate, and technical or supporting data from one of the bodies mentioned above. Letters of support from parents' groups and other civic or community organizations should also be included with the application package -- not sent afterwards.

Applications sent to the U.S. Office of Education's national headquarters usually arrive at a central control center where they are sorted by the Catalog of Federal Domestic Assistance number and routed to the appropriate program office. The proposals are then reviewed not only by agency staff but also by a panel of outside experts in the particular field. It is virtually impossible to find out the identity of the review panel members for your application. This information is usually closely guarded — anonymity insuring against any bias pro or con. In fact, potential readers have been known to disqualify themselves in advance either because they knew an applicant or because of some other reason which would mitigate against an impartial, objective decision based on the merits of the application itself.

The review panel considers each application on the basis of whether it responds to the designated program objectives. Does it stay within the bounds of the established restrictions? Does it show initiative and creativity of thought and planning? Does the project have the potential for being replicated in other areas? This last criterion is becoming more and more significant. A point grading system is devised and usually appears as part of the funding criteria document. In very general terms, those applications with the best overall scores are the ones that will receive awards.

In contrast to project grants, formula grants are allocated to all eligible jurisdictions or bodies for selected functions on the basis of some formula. In the case of education, the money usually goes to the state

education agency. The formula criteria, prescribed by the pertinent legislation, may include the fiscal capacity of the recipient, population, income levels, need or some combination of these factors. Even though the disbursement of funds is automatic, requiring no application, formulas regulating the grants are often complex and many, such as the Title I formula, have been criticized as inequitable.

While the federal government gives monies to the states and state agencies via formula grants (block grants), competition within the states on the local level for pass-through funds can often be as intense as that described earlier for project grants. Failure to learn the state's own regulations and guidelines for those formula grant programs which it administers could make a different in whether a local school district receives any such funds.

State education agencies publish this information in their own state education codes that define their roles and those of the local school districts in the administration of education programs for which they are responsible.

The major characteristic distinguishing contracts from project and formula grants is specificity. A federal agency employs the contract process to procure (purchase) an identifiable product under specified terms to the best economic advantage of the government. This process allows the agency to maintain close direction and control over the timing and development of the work.

Daily which lists all federal government procurement announcements: it is the U.S. Government's official shopping list for everything it needs to keep functioning that will exceed \$5,000. Supplies, furniture, equipment, land, chaplain services, feasibility studies, longitudinal surveys, applied research and consultant services are just a few examples of the types of services and products that are requested in the Daily.

Procurement announcements in the <u>Daily</u> are capsulized notices of <u>Requests</u> for <u>Proposals</u> (RFPs). The administering agency outlines the work, service or supplies it needs and the level of expertise it deems desirable, if not necessary. It also provides a skeletal time frame within which the work must be completed or the supplies delivered and indicates a date by which the proposal must be submitted. This announcement, however, is not to be confused with the RFP itself.

The actual RFP must be obtained directly from the funding agency. Certain standard procedures have to be followed: requests most often must be in writing, must be submitted within X number of days from the date of the published announcement in the Commerce Business Daily and must be accompanied either by a stamped, self-addressed envelope or mailing label. Additional requirements and constraints appear each Monday in the "Numbered Notes" section that should be kept handy for reference throughout the week. Adherence to a pertinent note may make the difference between an appropriate and inappropriate response.

A Request for Proposal can be a lengthy document for it describes in as much detail as possible the scope of work, the time frames, the professional and paraprofessional experience and expertise levels required and any other specific information the agency considers important to obtain the task it seeks.

With the actual RFP in hand, the potential contractor develops a proposal that should not only address the requirements of the RFP but should also advance the basic request by adding interesting tasks or proposing greater depth and detail to those outlined by the agency.

As in the case of project grants, review panels are set up to read and evaluate the various proposals submitted. The bidder submits a two-part proposal: technical and business. This initiates a three-step selection process. First, a technical review panel evaluates all proposals on the basis of their response to the scope of work and selects those considered worthy of further consideration, without reference to the business (budget) section. Second, the selected bidders from the first round enter into negotiation sessions with the technical panel, leading to a possible invitation to submit a "best and final" offer. In the third round, the best and final offers are further reviewed by the technical panel which then makes its recommendation to the agency's contract officer. This individual examines the surviving bids and selects the proposal offering the most reasonable budget. In simple terms, the best technical proposal with the best value to the government receives the contract award.

The RFPs of most interest to local school districts appear in the first two sections of the <u>Commerce Business Daily</u>: Section A -- Experimental, Developmental, Test and Research Work; and Section H -- Expert and Consultant Services. Many of the RFPs contained therein are open solicitations, meaning that any organization, institution or agency may bid provided it feels it has the necessary capacity to do the job.

There are two other types of RFP announcements with which a grantsman should be familiar. The first is a notice of sources sought. Some federal agencies call these notices Basic Ordering Agreements (BOAs) while others refer to them as Requests for Qualifications (RFQs). By whatever name, this device allows the agency to develop a list of qualified potential contractors in a particular field. Contractors responding to an RFQ submit a statement of capability; the agency selects those it considers most qualified and sends them any future RFPs in that area. Such RFPs are easily recognized in the Daily — they contain the phrase: "Negotiations are being conducted with the following firms ..." This type of announcement does not preclude others from bidding, but the chances of someone other than the previously determined qualified firms receiving the contract are very slim.

The government also awards <u>Sole Source</u> contracts. As the name implies, competitive procurement is precluded. A sole source announcement indicates that the agency is negotiating with one -- and only one -- organization already deemed uniquely qualified to perform the particular task. An RFP is published in the <u>Daily</u> but for informational purposes only.

Although Sole Source awards sound very appealing, this funding channel is one of the most difficult to obtain. There are extremely strict guidelines to be followed by an agency before it can approve such a contract.

An examination of the criteria follows:

- The Unique Capability of the Contractor The contractor must be the ONLY one having the specific equipment and/or talent to carry out a given program.
- Proprietary Information Are there patents, copyrights, secret processes or other proprietary information to be considered? Would it be harmful to this particular contractor if that type of information were divulged through public description to other potential contractors who might be competitors?
- Time and Money -- The delivery schedule for the service or product might represent an urgent need on the part of the requesting agency, and a single institution or organization is far ahead of its competition because of specialized equipment or background too expensive or time-consuming for another bidder to develop for this procurement.

The list continues into other areas, each of which tends to further restrict the competition:

- Is the present effort a continuation of a previous one performed by the bidder, and to what degree does that previous endeavor constitute a factor in the cost and/or quality of the current procurement?
- Are the personnel considered predominant experts in the particular field?
- What is the basis for predominance (professional publications, advanced degrees, professional society recognition)?
- Does the prospective bidder have a substantial investment of some kind which would have to be duplicated at government expense were another source to enter the field?
- Are any government-owned facilities involved?

In short, it becomes apparent that Sole Source contracts are not awarded lightly.

A local school district may think that RFPs are weighted so heavily towards profit-making firms or towards university research institutes that there is no sense in responding. While those types of organizations do represent stiff competition, a school district should respond to any announcement that looks at all relevant. You can make the final decision about actually bidding when you have the RFP itself in hand.

If you choose not to bid on a certain task, you can still benefit. The government must publish all contract awards of \$25,000 or more. By checking

the Contract Awards section of the <u>Daily</u>, you can learn the identity of the contractor for the area of interest and perhaps have an opportunity to subcontract with that organization. Furthermore, if the contract involves publication of a study or report at the completion of work, you may wish to contact the contractor to obtain a copy. The contents might have applicability for your district.

Finally there is the matter of <u>Unsolicited Proposals</u>. These may be submitted either for project grants or contracts and sound like promising, attractive sources of federal funds. However, while policy may vary from one agency to another and often within the same agency, it is extremely difficult to obtain funding through this procedure. The ideas behind the proposal must be truly unique and widely beneficial. Factors of creativity, long-range planning, replicability, cost-effectiveness and real need are weighed heavily by the funding agency. Unless a school district is convinced that its proposal meets all these criteria, it is probably wiser to seek federal assistance through one of the other methods described above. This is particularly true in times of ever-tightening agency budgets. As money becomes scarce, funds normally set aside for unsolicited proposals are the most expendable and the first to be cut.

Any school district interested in securing federal monies for its programs has a difficult task. It must determine its needs, set priorities among the needs, identify the federal programs which can assist, learn how the program's funds are dispensed, obtain all the regulatory documentation affecting the funding procedure, choose the method which represents the most certain promise of revenue, and - lastly - apply. This initial investment of time and effort can make the difference in whether or not the district is successful in obtaining any of the several forms of federal funding described here.

Induct project proposal to the funding Federal agency.

OMB Circulars: A-95

As non-profit organizations start to look for federal funds in untraditional areas, they are often faced with some confounding compliance procedures required by the Federal Office of Management and Budget. In this and forthcoming issues of Funding News we will review various OMB Circulars in an attempt to clarify some of these procedures.

For example, those NPOs interested in applying for the HUD Neighborhood Self-Help Development Project Grants will be subject to OMB's Circular A-95. A-95 is a proposal review process that was instituted to assure better coordination of projects that have some impact on the local community. It aims for intergovernmental cooperation in planning and development activities. Programs which come under A-95 review include all urban renewal and model cities-type projects, housing programs, educational and health care facilities, planning grants for health, law enforcement, community action and economic development, and many social service, education, and health programs.

Organizations which are applying for assistance under one of the covered programs must notify both Areawide and State Clearinghouses of their intent to apply as early as possible by completing the Letter of Intent (form SCH/FACS 1A--see sample on following page). This form is available from the State Clearinghouse. The applicant submits the Letter of Intent to both Areawide and State Clearinghouses, along with any pertinent attachments (maps, additional environmental data, and work programs are suggested).

The Clearinghouses then distribute copies of this Letter of Intent to reviewing state and local agencies, and to appropriate elected officials in order to have them evaluate the project. These evaluations concentrate on the potential effectiveness of the proposed project, the consistency of the project with existing plans for the area, and whether or not the project would duplicate or counteract other projects in the area. They identify, and take steps to resolve, potential problems or conflicts at the early stages of the project's development. This part of the process requires a minimum of 30 days, and it may be all that the applicant needs to do in advance of submitting the formal project proposal to the funding Federal agency.

However, as in the case of HUD's Self-Help Grants, Clearinghouses may request the completed formal application after reviewing the Letter of Intent. This involves an additional 30-day review period. The proposal is circulated among the same agencies which reviewed the Letter of Intent. If no issues are involved, the process can take only a few days. On the other hand, if there are problems, the meetings necessary to resolve them can take additional months.

Letters of acknowledgement and Clearinghouse comments are returned to the applicant and the applicant is responsible for submitting these comments along with the proposal to the funding agency.

The addresses of State and Areawide A-95 Clearinghouses for New York City are:

State Clearinghouse New York State Division of the Budget State Capitol Albany, New York 12224 (518) 474-1605 Tri-State Regional Planning Commission One World Trade Center 82nd Floor New York, New York 10048 (212) 938-4393

Department of Cultural Affairs, City of New York 830 Fifth Avenue New York, N.Y. 10021 360-8295

Henry Geldzahler Commissioner

WINTER 1980

Dennis Paul Development Officer

REPRINT

3. CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA)

While it is not comprehensive or complete, and the information in it must be carefully analyzed, the Catalog is an indispensable resource for anyone seeking Federal funding. It is important to realize that it is only a beginning; it should be used as a catalyst, and all information will need to be checked to ensure it is current and accurate. This government—wide publication contains Federal domestic assistance programs which must be requested or applied for.

As the basic reference source of Federal programs, the Catalog assists users in identifying programs which meet the specific objectives of the potential applicant and helps in obtaining general information on assistance programs and other resources available from the Federal government. The term assistance refers to the transfer of money, property, services, or anything of value, the principal purpose of which is to accomplish a public purpose of support or stimulation authorized by Federal statute.

The catalog is divided into four basic sections:

- I. Introduction
- II. Indices
- III. Program Descriptions
- IV. Appendices

I. INTRODUCTION

This section has been expanded recently, increasing its value considerably. Several significant improvements include: additional material on how to use the catalog, definition of the types of assistance, a chart diagramming the process/procedures in applying for Federal assistance, a section on suggestions for proposal writing and following grant procedures, and descriptions of the various Office of Management and Budget (OMB) circular requirements.

II. INDICES

To locate specific programs of interest, and to determine eligibility, users should consult the various indices. Each one has a specific function and you should be familiar with all of them to use the catalog most effectively. Each

program is catalogued by a five-digit identification number which you must include when requesting program packets and additional information. The first two digits in the CFDA identification number identify the Federal department or agency that administers the program, the third digit identifies the subdivision of the agency, and the last two numbers are assigned in numerical sequence as new programs are initiated.

AGENCY INDEX -- lists all programs in numerical order by the five-digit program identification number, under the agency responsible for administering the program.

APPLICANT INDEX -- indicates eligibility by program. Eligibility category listings include: Individual, Local, Nonprofit, State, U.S. Territories and Native Americans.

FUNCTIONAL INDEX -- lists programs by basic category and sub-category preceded by the program number. This index is preceded by a summary which lists all programs by 20 basic functional categories grouped by primary purpose, and 176 sub-categories which further identify specific areas of interest.

COMMUNITY DEVELOPMENT

HISTORICAL PRESERVATION

10.426	Area Development	Assistance	Planning	Grants ((B)
10.420	Area Development	MSSISIAIICC	I idillilling	Claints	(1)

- 11.300 Economic Development-Grants and Loans for Public Works and Development Facilities (B,E)
- 11.307 Special Economic Development and Adjustment Assistance
 Program—Long-Term Economic Deterioration (B)
- 13.923 Institute of Museum Services (B)
- 14.218 Community Development Block Grants/Entitlement Grants
 (A)
- 14.219 Community Development Block Grants/Small Cities Program (B)
- 15.403 Disposal of Federal Surplus Real Property for Parks, Recreation, and Historic Monuments (K)
- 15.405 National Registry of Natural Landmarks (J)
- 15.410 Historic American Buildings Survey (J,K,L)
- 15.411 Historic Preservation Grants-in-Aid (B)
- 15.412 Archeological Investigations and Salvage (P)
- 15.413 Historic American Engineering Record (J,K,L)
- 15.414 National Historical Landmark (J)
- 15.415 Technical Preservation Services (J,K,L)
- 15.416 National Register of Historic Places (K)
- 15.906 Park and Recreation Technical Assistance (K,L)
- 39.002 Disposal of Federal Surplus Real Property (H)
- 39.004 National Archives Reference Services (I,K,L)
- 39.006 National Historical Publications and Records Grants (B)

The alphabet(s) in parentheses following the program title show the type(s) of assistance available through that program; i.e., A - Formula Grants; B - Project Grants; C - Direct Payments for Specified Uses; etc. A complete listing can be found in the Introduction section.

POPULAR NAME INDEX -- a two-part index, alphabetic and numeric, which lists programs according to the name most commonly used by agencies or applicants when referring to a program.

SUBJECT INDEX -- provides a detailed listing of programs by various topics, general functional terms, categories of services, and selected beneficiaries. It is important to look through this index item by item at least once; you may find some unexpected sources of support for your program.

CULTURAL AFFAIRS

Arts

administrative, management improvement grants for cultural organizations and institutions, 45.013
architecture and environmental design, 45.001
art education materials, 68.001
Arts and Artifacts Indemnity, 45.201
artworks in public places, 45.009
grants to provide capital improvements for cultural facilities, 45.013
Challenge Grants, 45.013
citizen involvement, planning cultural development in communities, 45.013
craftsmen, assistance to, 45.009

Other listings that you should be aware of:

DELETED PROGRAMS
ADDED PROGRAMS
CHANGES TO PROGRAM NUMBERS AND TITLES

III. PROGRAM DESCRIPTIONS

After you have located specific programs of potential interest, you should consult the Program Descriptions which are listed in numerical order. Each program description provides you with detailed information divided into several categories; an explanation of each category can be found in the Introduction section of the catalog.

PROGRAM NUMBER, TITLE AND POPULAR NAME -- it is imperative that you refer to this sequence when writing for program information in order for the agency to properly respond to your request.

FEDERAL AGENCY — lists the department and general subdivision of the department that is responsible for the program. This information may be of limited value if there are many divisions. To determine who actually runs the program you should look at the "Headquarters Office" section under INFORMATION CONTACTS. To fully understand the organizational structure of Federal Departments, you could consult the "U.S. Government Manual" and the "Congressional Directory."

AUTHORIZATION -- lists the legal authority upon which a program is based. Reading the legislation can help to explain the background and general purpose of a program. Recent amendments could indicate new areas that will be funded. A program in the process of changing is advantageous, as it presents an opportunity for an organization which has not previously been funded. Recent laws that may have changed a program often are not reflected in the catalog.

OBJECTIVES -- indicates what the program is intended to accomplish or the goals toward which the program is directed. Often you will need to get more information regarding the program to actually understand what the objectives are. You must determine if the program's objectives are similar to yours and fit your organization's needs. A clear understanding will assist you in both determining the relevance of a program and the development of an appropriate proposal.

SAMPLE PROGRAM DESCRIPTION -- CATALOG OF FEDERAL DOMESTIC ASSISTANCE

13.571 IMPROVEMENT IN LOCAL EDUCATIONAL PRACTICE

FEDERAL AGENCY: OFFICE OF EDUCATION, DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

AUTHORIZATION: Elementary and Secondary Education Act, Title IV, Part C, as amended by Public Law 95-561; 20 U.S.C. 1831.

OBJECTIVES: To provide assistance to local educational agencies to improve their educational practices.

TYPES OF ASSISTANCE: Formula Grants.

USES AND USE RESTRICTIONS: Use of funds is defined as follows: expended to provide assistance to local educational agencies for activities that will improve their educational practices, including (1) development and demonstration of activities addressing serious educational problems such as the need for effective programs for children with special needs (e.g., educationally deprived, gifted and talented, and handicapped, children); high rates of children who do not complete secondary school; need of children in nonpublic schools for improved educational services (2) encouraging development and demonstration of improved means of carrying out programs for educationally deprived children in areas with large concentrations of low-income families; (3) activities to improve achievement of children in basic skills; (4) activities to encourage parental participation; (5) development of diagnostic methods for assessing achievement of children, including those in nonpublic schools; (6) professional development programs for teachers, administrators and other instructional personnel; (7) early childhood and family education programs; (8) expanding education beyond the school building; (9) encouraging innovation and improvement in compensatory education efforts. In fiscal year 1980, 5 per cent, and in fiscal year 1981, 10 percent of any increase in the funds available over fiscal year 1979 must be used to improve school management and coordinate all resources to improve means of meeting individual needs of every child in the school; 50 per cent of such increase must be used to advance the purposes set out in (1) above. Fifteen percent must be spent on special programs or projects for the education of children with specific learning disabilities and handicapped children; and expenditures for programs and projects for non-public school children will be equal to expenditures for public school children. JOINT FUNDING: This program is considered suitable for joint funding with closely related Federal financial assistance programs in accordance with the provisions of OMB Circular No. A-111. For programs that are not

identified as suitable for joint funding, the applicant may consult the headquarters or field office of the appropriate funding agency for further information on statutory or other restrictions involved.

ELIGIBILITY REQUIREMENTS:

Applicant Eligibility: Any State desiring to receive funds from Part C must establish a State Title IV Advisory Council and submit a State plan designating the State educational agency as the sole administrator of the plan. The State Program Plan (submitted not more than once in three years) must provide assurances for non-public participation, provide for State Advisory Council and SEA evaluation of programs and projects, every three years, provide assurances that Federal funds will not be commingled with State funds.

Beneficiary Eligibility: Beneficiaries include State and local educational agencies; elementary and secondary, public and non-public school children; and elementary and secondary, public and non-public school teachers.

Credentials/Documentation: A State Plan is required than once every three years. No specific due date is established, except that the effective date of approval cannot be earlier than July 1, or the date submitted, whichever is later. Costs will be determined in accordance with FMC 74-4 for State and local governments.

APPLICATION AND AWARD PROCESS:

Preapplication Coordination: Prior to submitting the Program Plan, the State must consult with the Title IV State Advisory Council and submit a general application. It must publish the plan for 60 days before submission.

Application Procedure: (1) Selection of an ESEA Title IV State Advisory Council, and certified to U.S. OE; (2) Preparation ESEA IV Annual Program Plan in accordance with prescribed format; (3) Approval of Plan by U.S. Commissioner of Education.

Award Procedure: Funds are released on July 1, if the application and program plan have been approved by U.S. Commissioner of Education, State agencies then award grants to local educational agencies whose project proposals have been approved by the State agency in accordance with the provisions of the approved plan. Notification of awards must be made to the designated State Central Information Reception Agency in accordance with Treasury Circular 1082.

Deadlines: None.

Range of Approval/Disapproval Time: 30 to 90 days.

Appeals: The U.S. Commissioner of Education shall not disapprove an ESEA IV application or State plan without providing reasonable notice and an opportunity for a hearing.

Renewals: Funds granted annually.

ASSISTANCE CONSIDERATIONS:

Formula and Matching Requirements: Funds allocated to states based on the ratio of State's 5 to 17 age population to the total population of the United States. Hold-harmless provisions at previous years level for each State. No matching requirements.

Length and Time Phasing of Assistance: Funds available for 27 months; released through Letter of Credit.

POST ASSISTANCE REQUIREMENTS:

Reports: An after-the-fact annual performance and financial report is required at the end of each fiscal year.

Audits: Audits are conducted by GAO and DHEW Audit Agency. The frequency varies.

Records: Retention period 5 years after completion of undertaking. FINANCIAL INFORMATION:

Account Identification: 75-0279-0-1-501.

Obligations: (Grants) FY 78 \$192,176,588; FY 79 \$197,400,000; and FY 80 est \$197,400,000.

Range and Average of Financial Assistance: \$840,537 to \$17,817,526; \$3,749,801.

PROGRAM ACCOMPLISHMENTS: In fiscal years 1978, an estimated 7,800,000 public and private school children in 2,000 local school districts will be served by this program. An estimated 8,400,000 children will be served in fiscal year 1979 and an estimated 8,400,000 children will be served in fiscal year 1980.

REGULATIONS, GUIDELINES, AND LITERATURE: Regulations
- DHEW, OE - 45 CFR Parts 100 C, 134, Program Plan format may be obtained from U.S. Office of Education, Bureau of Elementary and Secondary Education, Division of State Educational Assistance Programs, 400 Maryland Avenue, S.W. ROB-3, Room 3010, Washington, DC 20202.

INFORMATION CONTACTS:

Regional or Local Office: Not applicable.

Headquarters Office: Dr. Alpheus White, U.S. Office of Education, Bureau of Elementary and Secondary Education, Division of State Educational Assistance Programs, 400 Maryland Avenue, S.W. ROB-3 Room 3010 Washington, DC 20202. Telephone: (202) 245-2592.

RELATED PROGRAMS: 13.486, Strengthening State Educational Agency Management; 13.570, Libraries and Learning Resources. EXAMPLES OF FUNDED PROJECTS: Not applicable.

CRITERIA FOR SELECTING PROPOSALS: Not applicable.

TYPES OF ASSISTANCE — there are 16 types of assistance, 8 financial and 8 non-financial. A letter-coded descriptive listing can be found in the Introduction section of the catalog. Although your primary interest will probably be project grants, you should not overlook other types of assistance, e.g. various forms of technical aid. Receiving such assistance can help your organization establish contacts with Federal agencies, gain visibility, as well as eventually obtain financial assistance.

USES & RESTRICTIONS -- describes the possible uses for the assistance provided and any restrictions. It will also indicate whether the program is suitable for joint funding. Since this section translates the objectives into specific types of projects that may be funded, it can help you obtain a clearer understanding of a particular program's purpose.

ELIGIBILITY REQUIREMENTS:

Applicant Eligibility -- indicates who can apply to the Federal Government for assistance and the criteria they must satisfy.

Beneficiary Eligibility -- lists the ultimate beneficiaries of a program, the criteria they must satisfy and who specifically is not eligible. This section is particularly relevant to fully comprehend programs which first pass through state or local governments.

Credentials/Documentation --states what the applicant will have to prove or certify prior to, or along with, an application. Often it will specify points that you must include in your proposal.

APPLICATION AND AWARD PROCESS:

Preapplication Coordination — indicates whether any prior coordination or approval is required with governmental or nongovernmental units prior to submission of a formal application.

Application Procedure -- discusses the basic procedural steps required.

Award Procedure -- lists the basic procedural steps for awarding assistance. Also indicated is whether assistance passes through the initial applicant for further distribution by intermediate level applicants to groups or individuals in the private sector.

Deadlines -- this sub-section is important, but often the information provided is not adequate. More accurate application deadline information can be obtained in the agency's program guidelines, in the Federal Register, or by contacting the funding agency.

Range of Approval or Disapproval Time -- lists the representative range of time required for the application to be processed.

Appeals -- where applicable, discusses appeal procedures or allowable rework time for resubmission of applications. Appeal procedures vary with individual programs.

Renewals -- indicates whether renewals or extensions are available and lists the procedures.

ASSISTANCE CONSIDERATIONS:

Formula and Matching Requirements -- indicates requirements prescribed in the allocation of funds. Usually Federal funds can be matched by cash and/ or in-kind contributions (space, equipment, volunteer time, etc.). Various Federal Management Circulars discuss aspects of cost sharing.

Length and Time Phasing of Assistance -- describes time period in which assistance is available, any restrictions placed on the time permitted to

use the funds awarded, and the timing of disbursements, e.g. lump sum, annually, quarterly, or as required.

POST ASSISTANCE REQUIREMENTS:

Reports -- indicates whether program, expenditure, cash reports or performance monitoring is required, and specifies at what intervals.

Audits -- discusses type, frequency, and time periods audits are required.

Records -- indicates the record retention requirements.

FINANCIAL INFORMATION:

Account Identification -- identifies where in the Federal budget the program is funded, type of funds involved, timing of transmittal and functional classification.

Obligations -- lists dollar amounts for the past, and estimates for the current and coming fiscal years.

Financial Assistance -- lists the representative range (smallest to largest) and average amount of awards.

This section illustrates the primary limitation of the catalog — its inability to provide information as current as you need to successfully obtain funding. You will need to know how much money, if any, a program has available and when. This information will allow you to submit your application at the time when it has its best chance of being funded. Your chances of funding are nil if a program has already committed its authorized funds for the current fiscal year. Contacts with Federal agency staff and other sources of information are quite important in this regard as the Catalog is prepared with a good deal of lead time.

The information in the section is valuable in that it shows you the year-to-year funding trend. If the trend is downward, the agency will probably use its funds to continue funding previously supported projects. If the trend is upward, however, your chances are considerably improved.

PROGRAM ACCOMPLISHMENTS: briefly describes the program results achieved, or services rendered. This section can assist you in determining the concerns of the administering agency and what specific types of projects are being supported by this program.

REGULATIONS, GUIDELINES & LITERATURE: lists pertinent published information regarding that program, e.g., guidelines, handbooks, manuals, etc. Since program regulations are published first in the Federal Register (FR) and later in the Code of Federal Regulations (CFR), citations to the CFR are listed. The CFR can be found in most major libraries.

When writing for information you must name the specific program and its CFDA number. You should also ask to be put on the mailing list, as well as request a funding history and any other relevant information/publications.

INFORMATION CONTACTS:

Regional or Local Office -- lists agency contact person, address and telephone number of the Federal, regional or local office. Most major agencies have regional offices and often funding decisions are made at that level. Personal contact is absolutely essential to find out how the funds flow, who is responsible for what and whether money is currently available, etc.

Headquarters Office -- lists names, addresses and telephone numbers for those with direct operational responsibility for program management.

RELATED PROGRAMS: lists all closely related programs with similar objectives and program uses. This cross-indexing system may lead to other programs which provide additional project assistance.

EXAMPLES OF FUNDED PROJECTS: indicates the different types of projects which have been funded in the past. This list will provide you with an idea of the kind of projects that are suitable for funding.

CRITERIA FOR SELECTING PROPOSALS: indicates the criteria used to evaluate proposals.

IV. APPENDICES

This last section of the Catalog contains six appendices which provide additional necessary information for applicants:

APPENDIX I -- PROGRAMS REQUIRING CIRCULAR COORDINATION:

The Office of Management and Budget (OMB) now requires that certain programs be reviewed by State and areawide agencies. This system is designed to unify the review and administration of programs, as well as promote consistency and coordination among the different agencies and levels of government. A description of each OMB and Treasury Department circular can be found in the Introduction section of the catalog.

APPENDIX II -- AUTHORIZATION APPENDIX: tells which programs are authorized by what legislation.

APPENDIX III -- COMMONLY USED ABBREVIATIONS AND ACRONYMS.

APPENDIX IV -- AGENCY REGIONAL AND LOCAL OFFICE ADDRESSES.

APPENDIX V -- SOURCES OF ADDITIONAL INFORMATION CONTACTS.

APPENDIX VI -- PROGRAM APPLICATION DEADLINES.

Supplements to the CFDA will be printed twice this year; the first is currently available. These supplements highlight new programs and provide the most current information. In addition, listings of deleted and modified programs are included. Again, it is important to remember that the Catalog is a starting point and it is essential that you check all information with the administering agency.

The catalog can be located at the following places:

- -- Congressional Offices
- -- Federal Information Centers

In N.Y.C.

Federal Building 26 Federal Plaza Room 1-114 New York, N.Y. 10007 (212) 264-4464

-- Federal Regional Councils

N.Y.C. is located in Region 2:

26 Federal Plaza Room 3502-B New York, N.Y. 10007 (212) 264-1011

(20)

-- Depository Libraries for U.S. Government publications (Check with your local library).

Reading Regulations

Question: Does it really matter whether you read the regulations? Answer: It does. According to one OE official, "That's our biggest problem. We receive some excellent proposals each year that do not survive the selection process because the applicant failed to address certain issues, for example, or put forth an evaluation plan. Then the applicant comes to us and says, 'Why didn't I get funded?' And we have to say, 'Go read the regulations.'"

Reading regulations is not easy, as any grant applicant will attest to. As in everything, practice helps. In this section, we have brought together some observations and tips on how to read regulations in the belief there is nothing so mystical about federal regulations after all, once certain peculiarities are explained. So take out your favorite set of regulations and a red pen and feel free to mark as we go.

Two Essential Principles

There are two very general and very interesting observations that can be made about regulations. One deals with how they are organized and the other with how they are written:

- a. Subject matter is not organized by its importance.
- b. Each word is included for a reason.

Subject matter is not organized by its importance. Regulations written by the Office of Education are organized according to a strict sequence of categories. The categories themselves will be discussed below. The net effect of such an abstract organization is that requirements that are very important to a school district can appear to be "buried" in an obscure corner of the document. The last item in a long list may be the most important from a school's point of view.

Furthermore, because of the abstract organization, a requirement applying to an item (such as, "all training programs must employ at least 15 percent minority persons") may not be mentioned in the same place but instead be found seven paragraphs later, in another section.

The only way to cope with such an organization is to read the regulations carefully and thoroughly, from beginning to end. Each applicant must be a sleuth, with his or her eye out for statements tucked, in corners.

Each word is included for a reason. Because of the way regulations are organized, applicants sometimes have a sense that the writers are not paying strict attention to what they are writing. If they were, then how could they put pieces of related information in different places and why do they sometimes seem to be repeating themselves?

In fact, as is explained elsewhere in this chapter, each set of regulations is read in draft form by large numbers of people, and examined with a fine-toothed comb for redundancies, inaccuracies and lack of clarity. Each word is examined for the contribution it makes to the meaning of the sentence of which it is a part. All unnecessary words are removed.

The end product is meant to be as precise as an algebra formula. For example, if the regulations say that an application must contain "a plan for disseminating information to others during the course of the project and at the conclusion of the project funding period," then an applicant whose application contained a plan only for disseminating information at the end of the project funding period would not be eligible to be considered for a grant. Remember, no requirement is mentioned casually and each word is included intentionally. There are no implications. Everything is explicit.

Two Kinds of Regulations

Every time a new program is begun or every time a substantial change is made in the regulations of an existing program, the Office of Education is required to publish a Notice of Proposed Rulemaking (NPRM) in the Federal Register. This means that OE publishes the program's regulations as they have been drafted so far, for the purpose of allowing the public an opportunity to comment on them.

If regulations are needed for an entire program, then the proposed regulations will be published in their entirety. But if only a section of existing regulations is being amended, then OE need only publish in the \overline{FR} that section of the regulations which it proposes to change.

Proposed regulations are the first kind of regulations which appear in the Federal Register, and final regulations the second. In order to tell whether a particular set of regulations is proposed or final, go to the very beginning of the announcement, where the name of the program (Career Education, Bilingual Education) appears. Beneath it will appear the words, "Proposed Regulations," or "Proposed Rulemaking" if they are proposed. And, in the paragraph that follows, you will find the words, "the Commissioner of Education ... proposes to establish the following regulations..."

Final regulations, on the other hand, may not have the words, "final regulations" printed at their head, but they will begin with the words, "Notice of proposed rulemaking was published...."

In every set of regulations that you read, the language in the first paragraph will indicate whether the regulations that follow are proposed or final.

Does it matter whether a set of regulations is proposed or final? That depends. If a particular program decides to award its grants under the authority of its final regulations, then applicants will be wise to discard the proposed version. Changes may have been made in the final regs that they will want to be aware of, as a result of comments OE received on the proposed regs.

On the other hand, although it seems illogical as well as illegal, the Office of Education is allowed to establish a deadline for the submission of applications after only the proposed regulations have been published.

There are only two requirements which must be met. The first is that when the final regulations do appear, they contain no substantial changes from the proposed regulations. The second is that no formal grants can be made until

the final regulations have been published. According to OE, the making of grants is determined by when the selection of grants is announced. That is to say, the selection may have taken place within OE, but as long as it is not announced, no violation of federal law has occurred.

When a set of proposed regulations appears in the Federal Register, potential applicants cannot rest easy. The deadline for applications could be announced soon after. Consider the example of Part A of Title VII, the Reading Improvement Projects Program. The proposed regulations appeared in the \overline{FR} on December 4, 1975. The deadline of March 16 was announced twelve days later, on December 16. The final regulations appeared in the \overline{FR} on May 26, 1976.

Reading the Comments Section

At the beginning of every set of final regulations there appears a section labeled, "Summary of comments; changes in the regulation." This section may be very short or quite long, depending on the number of comments which the program received on the proposed regulations and on the controversial nature of the regulations. Applicants may suppose that they may skip reading the comments section and go right on to the regulations themselves, but they make an error in doing so.

The comments section can sometimes be the most informative, meaty and helpful section of the regulations. Despite the fact that they are not as legally binding as are the regulations themselves, the comments and the responses to them are very important. It is in the comment section that the program staff responsible for the regulations explain in clear language their intentions in writing certain phrases in the regulations and address matters of controversy regarding definitions and requirements which are omitted from the formal publication.

Take an Overview

Before settling in to read the regulations themselves, it is important to be familiar with exactly what they contain. Is more than one grants program described here? If so, which ones are school districts eligible for?

To answer these questions, cast your eye down the first column(s) of the announcement until you find the printed signature of the Commissioner of Education and/or the Secretary of HEW. These signatures mark the end of the introductory section. Comments to proposed regulations are published in this introductory section.

Immediately after the signatures appears a kind of outline, broken up by section, of the regulations which follow. Here is what you should see (example is taken from the Community Education Regulations):

Subpart A - General

Sec.

160c.1 Scope and purpose

160c.2 Definitions

160c.3 Elements of a community education program

160c.4 Limitation of number of applications

160c.5 Duration of projects

160c.6 Community Education Advisory Council

160c.7 Clearinghouse, technical assistance

160c.8 (Reserved).

Subpart B - State and Local Education Agency Projects

160c.9 Eligibility (160c.10 Scope of federally assisted projects. (etc.)

Looking over this outline, an applicant can then decide which sections of the regulations to read.

In every regulation, Subpart A should be read by everyone, as it will contain the definitions of the terms used throughout the regulations (Do you qualify as a local education agency? Check the definition in Subpart A.) as well as other kinds of general information that applies to all programs.

In the Community Education regulations, for example, Subpart A contains a section 160c.3, where the elements of a community education program are described. Because these elements are described in Subpart A, they must be present in a program whether it is funded under the Subpart B program, for state and local education agencies, or under the Subpart C program, Training Projects in Institutions of Higher Education.

After identifying Subpart A, count the remaining subparts (as listed in the outline). There will usually be one subpart for each separate grants program. For example, the Community Education regulations are divided into three subparts: Subpart A (General), Subpart B (State and Local Educational Agency Projects), and Subpart C (Training Projects in Institutions of Higher Education).

Sometimes, as is the case with the Community Education regulations, subparts seem to be established on the basis of who it is that may apply. State and local education agencies are eligible to apply to Subpart B while only institutions of higher education may apply to Subpart C.

This suggests that LEAs for example, need only read the regulations which apply to Subpart B. In fact, however, LEAs will want to read the regs for Subpart C as well because in them is a section (160c.32) on training to local educational agencies. While LEAs are not eligible to apply to OE directly for these funds, they may wish to consider making some arrangement with a nearby institution of higher education to apply for a grant under Subpart C.

Other regulations will be divided into subparts according to the purposes of the grants. In such cases, there will be several programs which LEAs, for example, will be eligible to apply for. In the Bilingual Education regulations, LEAs are eligible to apply for four out of the six programs. To find out which kind of institutions and organizations are eligible under each subpart, the applicant need only read the section marked, "eligible applicants." These eligibility sections, to repeat, are strictly specific in their content. If local education agencies are not eligible, then they will not be listed.

Study the Subpart

Having spent a few minutes looking over the regulations and establishing which of the various programs (if there is more than one) to consider, the applicant is ready to begin a closer reading of the subparts he or she has selected.

Most subparts contain the following sections:

- a. Scope
- b. Eligible applicants (also called Eligibility for assistance)
 - c. Project purposes (also called Authorized activities)
- d. Required application data (also called Applications)
 - e. Application review criteria (also called Criteria for assistance).

The section on "Scope" is usually a very general statement meant to guide the peruser to the appropriate program.

The section on "Eligibility" is a description of who or what is eligible to apply for grants or contracts under the subpart. Terms and phrases used in this section are usually defined in the section called "Definitions" of Subpart A (General). The "Eligibility" section is expected to be read with those definitions in mind.

The section on "Project purposes" must be read very carefully. Here the program staff has indicated exactly what types of activities a grant may be used to support. The list is meant to be inclusive: that is, if an activity you have in mind does not appear in this list, then it is not eligible.

The Heart of the Regs

The next two sections, "Required application data" and "Application review criteria" are what might be called the heart of the program regulations. In the first of these sections the key phrase is "application". The section is simply a list of the various things which an application must contain.

Much of the material in this list will not be new to the applicant. He or she will have read similar statements in other sections of the regulations. Why, then, is it repeated? Because the information is being presented in this section for a different purpose. Here, OE's intent is to list everything that belongs in the application. The applicant is expected to check his application against the list. He may count on the fact that the Office of Education will be doing the same.

In the second section, "Application review criteria," the key word is "criteria." This section contains a list of the criteria by which OE plans to judge the application. Not surprisingly, there is often a good deal of similarity between the list from this section and in the first section (Application data). Again, why the redundancy? Because the lists are for two

different purposes. One is meant to be a guide in helping the applicant write his application. The other tells the applicant where OE's priorities lie as far as the quality of the application is concerned.

Example: Dissemination

To illustrate: In the "application" section of the Community Education regulations under Subpart B, OE states that "the application must make provision for dissemination of information on the results of the project and of the means used to achieve the results" and then lists the various organizations, institutions and groups which must receive this information: local education agencies, state education agencies, other educational agencies and institutions, the Commissioner and the national clearinghouse on community education.

Then, in the "criteria" section of Subpart B, dissemination is listed as one of the general criteria. The regulations state that OE will consider "the adequacy of provisions (in the application) for the dissemination of information about the project to potential participants in the community and to other interested agencies, institutions and individuals."

It is instructive to compare the differences between the two statements on dissemination. The first statement does not mention "potential participants in the community" as a target for dissemination; yet, it is clear from the statement in the second section that "potential applicants" are one of the groups which OE would like to see the applicant be sure to include in his or her dissemination plan.

In the "criteria" section, the point value of each criterion or group of criteria is also indicated. The points are awarded by the reviewers according to the extent to which they feel the applicant has succeeded in meeting a particular criterion.

The points are another indication of the elements of the application which OE feels are important. For example, in the Community Education regulations Subpart B "criteria" list, 80 points are awarded to applications which show that their projects will involve schools and school boards and will respond to the needs of the community, despite certain logistics problems. OE also awards a maximum of 10 points to projects which are located in an area where few applications have been from.

Comparing the two criteria, it is clear that where an application comes from or the type of area (urban or rural) is much less important to OE than the nature of the program's relations with its community.

These, then, are the kinds of clues that a close reading of a set of regulations can produce. A set of well-read regulations - heartily underlined with a red pen and decorated with cryptic marginal notes - can be your best friend as application writing time draws near. Ignored, regulations can only be your enemy.

FUNDING DEFINITIONS

APPROPRIATIONS

The Congressional action of setting aside funds earmarked for a particular federal agency or program to spend or lend. Appropriations made up the lion's share of "budget authority." The actual expenditure does not have to be made in the fiscal year the money is appropriated.

AUTHORIZATION

Basic substantive legislation (as opposed to appropriations) enacted by Congress which sets up a federal program or agency either indefinitely or for a given period of time. Such legislation sometimes sets limits on the amount that can subsequently be appropriated, but does not usually provide budget authority.

BACKDOOR SPENDING

Spending which is not subject to year by year congressional or executive action. The spending authority for programs that receive funds this way is usually written into the authorizing legislation. The spending is "backdoor" because no appropriations committee deals with it, nor is it voted on in Congress separately.

BOILERPLATE

Refers to standard printed sections, paragraphs, or pages that have repeated use and application in various contracts or proposals. Boilerplate includes resumes, institutional descriptions, etc.

BUDGET PERIOD

The period of time (within the project period) covered by a specified budget. The budget period is generally 12 months, but may be more or less if appropriate to the project. The beginning and ending dates of the Budget Period are found on the Grant Award.

CATEGORICAL FUNDS

Project money that is allocated on the basis of both the type and extent of benefit to be derived from the project. Generally, categorical funds are awarded for specific types of activity and/or in response to specific priorities of the sponsor.

CONTINUING RESOLUTION An interim stop-gap measure issued at the end of each fiscal year to continue the flow of money to programs whose regular appropriation bills have not been funded.

CRITERION REFERENCED TEST nee 6 poisses

A criterion referenced test is one that is deliberately constructed to yield measurements objectives and tasks can that are directly interpretable in terms of specified performance standards--mastery of a specific skill or detailed learning objective.

ENTITLEMENT FUNDS

Project funds that are allocated and awarded primarily on the basis of a formula that seeks to spread the available funds among recipients in some sort of equitable fashion. The allocation formula will attempt to rationalize on the basis of some implication of need and may involve such factors as size, location, population, etc.

EQUIPMENT

rate regresents the natio

A movable or fixed unit of furniture or furnishings, an instrument, a machine, an apparatus, or a set of articles which meets all of the following conditions: (1) it retains its original shape and appearance with use; (2) it is nonexpendable, that is, if the article is damaged or some of its parts are lost or worn out it is usually more feasible to repair it rather than replace it with an entirely new unit; (3) it does not lose its identity through incorporation into a different or more complex unit or substance.

FEDERAL CATALOG NUMBER Program descriptions are arranged in sequential order in a five digit numbering system in the Catalog of Federal Domestic Assistance. The first two digits indicate the Federal department or agency. The third digit indicates the subdivision.

FISCAL YEAR

A time span which used by the Federal Government for accounting purposes begins October 1 and ends September 30. Fiscal 1978 began on October 1, 1977. The fiscal year designation is determined by the calendar year in which the fiscal period ends.

FORMATIVE EVALUATION

Refers to evaluation that is conducted during the operation of a program for the express purpose of providing evaluation information to program directors for their use in improving the program.

GOAL A broad, general statement, setting a sense of direction from which objectives and tasks can be developed.

IMPOUNDMENT

A general term that refers to the withholding of budget authority from obligation, that is recissions or deferrals.

INDIRECT COST RATE

The ratio, expressed as a percentage, of an organization's total indirect costs to its direct cost base (commonly direct salaries and wages). When a rate is established for a specific activity or program (e.g., research) the rate represents the ratio of the total indirect costs allocated to the activity or program to the direct base costs of the activity or program.

IN-KIND CONTRIBUTION

Goods or services having monetary value made available to the project as a contribution. If your organization makes a mobile van available for use in a project, it makes an in-kind contribution. If your organization puts up money to buy the van, the contribution is a cash contribution and not an in-kind contribution.

MAGNET SCHOOL

A school or education center that offers a special curriculum capable of attracting substantial numbers of students of different racial backgrounds.

MULTIJURISDICTIONAL AREA

Any geographical area comprising, encompassing, or extending into more than one unit of general local government.

The lack of something which, according to the best information available, is necessary for the self-actualization of individuals for the improvement of the quality of life in the community.

NEUTRAL SITE SCHOOL

Is defined by its physical location and must be accessible to substantial numbers of students of different racial backgrounds. Such schools might be located in shopping centers or some other central location.

NONPROFIT ORGANIZATION

Any organization no part of whose net earnings may lawfully inure to the benefit of any private shareholder or individual.

NORM REFERENCED TEST

An objective achievement test intended to provide valid discrimination among students of all levels of achievement. This test shows the relationship of the student to a specified population.

NOTICE OF GRANT AWARD

The official document that notifies the grantee of the award of a grant.

OBJECTIVE

A description of what you are willing to be accountable for as a result of spending the sponsor's funds.

PRF-APPLICATION

A submission made for the purpose of obtaining information or advice about the probable acceptability of the preparation of a future application.

PROGRAM ANNOUNCEMENT

A statement providing information on programs for which applications are being solicited including deadline dates and other relevant information.

PROJECT PERIOD

The total time for which support of a project has been programmatically approved. A project period may consist of one or more budget periods. The total project period comprises the original project period and any extensions thereof.

RFP (REQUEST FOR PROPOSAL

A document issued by a sponsoring agency for the purpose of inviting qualified organizations to submit a proposal to accomplish a specific scope or work that is outlined.

RESCISSION

Enacted legislation canceling budget authority previously granted by Congress. Rescissions proposed by the President must be approved by the Congress within 45 days in order to become effective.

SEED MONEY PROJECT

A project that once having been initially funded is intended to create a continuing or long term impact without the subsequent infusion or outside support. In other words, a project that once having started, becomes self-sustaining.

SOLICITED PROPOSAL

An arrangement whereby a sponsoring agency requests that you prepare a proposal for submission to it. The project concept originates with the agency.

STATE CLEARINGHOUSE

An agency of the State Government designated by the Governor or by State law to carry out the requirements of Part 1 of Attachment A of Circular A-95.

SUPPLANTING

A procedure whereby an applicant shifts the burden of support for some type of a required, customary, or desirable activity to an agency. Supplanting by a recipient agency is frowned upon or legally restricted by most sponsors, but it is difficult to prove. If you get a grant to do X, but you would have done X anyway, and then you go ahead and do something else with the money you were originally going to spend doing X then you are supplanting.

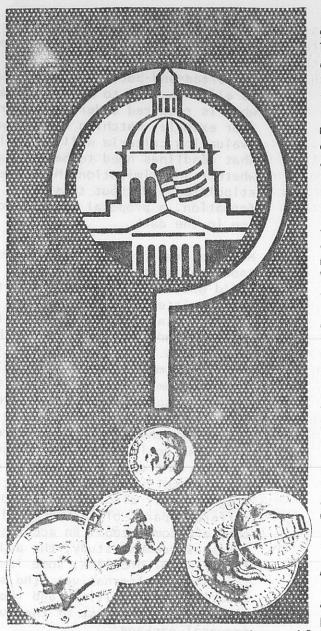
SUMMATIVE EVALUATION

Refers to evaluation conducted at the end of a program for the express purpose of judging the worth or effectiveness of that program for potential users for whom it has been developed.

SUPPLEMENTAL APPROPRIATIONS

Still another separate legislative action, supplemental bills usually represent the Administration's request for additional funds for programs which were not included in the regular appropriations bill usually due to lack of authorizing legislation.

HOW TO ASK FOR FEDERAL FUNDING



In the eyes of the unsucessful applicant, grants are monies that go to someone else. Trying to figure out why some other fellow came away with the purse all too frequently leads the disappointed applicant to one of two thoroughly rationalized conclusions. In the case of discretionary grants, which must be competed for, there is -- so reasons our loser--always some other applicant with an inside track. In the case of straight formula grants, it is a matter of bad luck in drawing reviewers who must have moths in their billfolds. Therefore, what chance, asks the unsuccessful applicant, does an aspiring grantee have in the game of grantsmanship? Although not yet found in Webster's Third, grantsmanship may be defined as "the skill of identifying and procuring funds." Our interest here is explicitly federal funds.

Indeed, the federal funding scene in education is a complex variable. Large businesses call upon sophisticated market analysts to advise them on market shifts and possible revenue sources. But, as Bonny Franke points out in "Grantsmanship: Federal Context from State Level Perspective," an educational institution's or individual's search for funding sources draws mainly on a less-than-scientific "personal astuteness" and, more recently, the educated guesses of a managerial staff.

A frustrated applicant who is earnest about learning grantsmanship might well consider a third possibility for rejection: the proposal itself. Contrary to some opinion,

federal grants are not mysterious gifts given from on high. They are public funds appropriated by Congress under a particular federal program to enable an institution or individual to carry out an educational project or study of merit. The phrase "of merit" suggests some genuine need. Federal dollars generally find their way to institutions, school districts, rural and urban communities, and individuals that have carefully developed a project proposal built from substantiated

This article has been reprinted with permission from American Education, July 1977, pages 6 - 9, published by the U.S. Office of Education, DHEW.

need. Accordingly, the needs assessment part of the proposal process is no mere embellishment. It ties a proposal to genuine need and thus justifies it application.

A second caution involves the actual proposal process. Although it may sound like a good idea at first thought, it is a mistake to have one person do the whole process from planning to final proposal. The single-person approach generally turns out a proposal that is onedimensional and too full of gaps to be persuasive. Even worse, if the proposal happens to be funded, the one-man show is fated for difficulties later on because those who will implement the funded project were not involved in its planning. Entering the picture after the grant has been awarded, they will want to operate the project their way. It is better to have a team work on the proposal, using many skills, ideas, and perspectives to round out the package. And it is always wise to involve the sponsoring institution -- for example, a university at which an applicant teaches -- so that its support will be there when needed.

PLANNING A PROPOSAL

With the merit of the proposal established and the idea in mind that a team will work on specific development phases, the process begins. At the outset the staff should order from the pertinent federal or state agency copies of the laws and regulations that govern the particular program under which the grant application will be made. The laws set forth the general perimeters, but it is the regulations and guidelines that will

prove the most valuable to a prospective grantee. They contain the bread-and-butter details: who is eligible, how to make application, what is required under the program (for example, matching funds), what evaluation criteria will be applied, what deadlines need to be met, and whether any limitations have been stipulated. Without this vital information, a proposal team is working in the dark.

Most veteran proposal coordinators know that a proposal begins on solid ground if it has a full steering committee of administrators, faculty, staff, and members of the academic and sometimes neighborhood communities. The committee decides what tasks must be done, who will perform them, and what sort of timetable can satisfy the proposal deadline. It may want to make some changes in the original work breakdown. As goal-setters and directionfinders, the committee members guide the proposal through its formative stages. They also check out the different parts of the proposal as they are completed: an accurate needs-assessment study, the addressing of major problems, some identification of alternatives, the specification of priorities, and the overall logical coherence of the total proposal package.

Another tip that grants coordinators sometimes learn the hard way is that the needs assessment should be done early in the planning stages. Federal, state and local agencies stress that applicants must first identify needs before they can seriously consider applying for funds. It involves much more than warming over statistics or rehashing old problems. The assessment should

demonstrate a reasonable blend between the perceived needs of faculty, students, and community and the needs inferred from objective data. For example, in order to establish reasonable needs and measurable objectives, the staff must draw data from indicators such as achievement levels, drop out rates, number of students going to high school or to postsecondary institutions, and attendance rates -- whatever is relevant to the proposed activity. If a proposal does not document underlying and stated needs, it fails to justify its existence. For proposal reviewers and evaluators, the needs assessment is a yardstick for measuring the degree to which an applicant understands and can document the current situation of his institution or organization as well as how well he can translate it into a statement that shows the needs of the target group to be served.

Needs assessment should begin at the local level, with an eye toward national priorities and how they might relate to the local scene. By calling or writing key people such as program officers at the national or regional offices of the funding agency the proposal staff can find out what these priorities are. How much an applicant can reasonably relate his needs to national priorities will be a cardinal point to be weighed by the reviewer or evaluator. The tie-in is legitimate as long as locally identified educational needs are not distorted or contrived to correlate with national ones.

Although the grantsman's biggest resources are the staff, faculty, students, and representatives of the local community, there may be occasion for seeking advice and assistance from outside consultants at nearby colleges or universities or even consulting firms. However, it is unwise to delegate the proposal writing itself to outside individuals or groups because they generally lack the detailed grasp of a situtation or problem that produces a sound proposal based upon real needs. The writing is best assigned to a staff member.

Most experienced grantsmen know that there is something to be said for establishing "inside" contacts with funding agencies. Officials and staff persons within these agencies are expected as public servants to answer requests for factual information. They are not expected to provide comments about specific or general program plans when the information-seeker is knee-deep in the draft stages of a proposal. But they can and will clarify for the grant applicant such details as program objectives, goals, priorities, and budget questions. As a group, agency personnel are less than enthusiastic when it comes to dealing with "fishing expeditions" by a grantsman about possible projects or "quidance" on where money might be appropriated. Some speculators will try it, of course. As one hustler has expressed it: "We have the problems if you have the money." Such underthe-table tactics, though, are beyond the bounds of legitimate inquiry.

Some funding agencies and many of their regional offices offer preapplication workshops, mailouts, and other ways to clarify or interpret important items of information such as demographic data, recommended proposal length, estimated budget figures and scope, and rules about subcontracting. Applicants can inquire by letter or phone about these services.

One critical point that separates a good proposal from a mediocre one is how much time the team spent on researching the subject. Many a proposal has lacked sound background information because the necessary spade work was not done. Research should begin as soon as the program priorities are selected. The team researcher assigned to review the literature and select applicable research findings can do two good deeds: First, he can arm the proposal writer with the facts and, second, he can further make them available to the program design team responsible for preliminary decisions on how the program will be organized once it is funded.

WRITING THE PROPOSAL

Once the team has reviewed and cleared its recommendations, objectives, and budget considerations with the steering committee and pertinent information has been gathered, it is time to begin writing the proposal. Although it is not recommended that one person do the entire proposal process from soup to nuts, it is wise to select one individual to write up the proposal package. parts are assigned piecemeal to a number of people, the end products is likely to be an untempered assortment of details and observations that lack unity and coherence. One writer can avoid this pitfall. It is desirable that the person chosen to be the proposal writer will also have been involved from the earliest planning stages.

The proposal is best written in clear, concise standard English in straighforward style. Educational platitudes, excessive clauses and phrases, circumlocution, and obscure jargon are excess baggage. The proposal writer should resist the temptation to pad the language.

When the first draft has been completed, the steering committee can review it and ask outside professionals for their comments. The draft, following requirements for format and containing the application forms, should closely resemble the style of the final product. While proposal formats vary from program to program, most incorporate these five essential points:

Justification. With few exceptions, the criteria for evaluating most proposals address one or more of these questions: Why should the proposal be funded? Are the needs to be met specifically stated? Are the target populations clearly defined? How long has the problem existed? What local or regional efforts to date have tried to meet the needs?

Objectives. To establish that the proposal has discernible goals, this section generally asks: Are the proposed objectives measurable and do they relate to the stated problems? What behavior is to be changed? How will the change be measured? How long will it take to achieve each objective? What measurement indicators will be used to determine if the objectives have in fact been achieved?

Procedures. To determine the logistics involved, this section asks: How many participants will be selected and by what eligibility criteria? Who will administer the program? What are the qualifications for program staff members and will the staff be part time or full time? What facilities and supplies are necessary for implementing the program? Are consultants' costs to be charged to the grant and for what specific purposes? Will subcontracts be used?

Location. Using the measurable objectives stated earlier in the proposal as indicators of results, this section asks: What objective evaluation techniques will be used? How frequently? Who will evaluate the effort and where will the written reports be sent?

Budget. The proposal must demonstrate a clear and strong relationship between the stated objectives or the project's work plan and its budget. Thus, each line item should have attached justification sheets to answer: How much will each staff member be paid? What equipment and supplies are needed and why? Who will travel and for what reasons? Will subcontractors be used?

FINISHING THE PACKAGE

Most completed applications usually have three parts: the application form along with any other required forms, the work program that is stated in measurable objectives, and the budget that has been justified and related to the stated objectives. Many an aspiring grantsman has missed the boat because he failed to understand or show in the proposal that each of these parts bears equal importance. If there is no logical and close relationship among the proposal's parts, its data, work tasks, and costs, and yet -- somehow -- the applicant is funded, some real problems can be anticipated during subsequent negotiations and later in the program period.

In the end, grantsmanship comes down to salesmanship that is based on a sound product. If the grantsman has paid attention to agency requirements, done his homework, and applied common sense, the proposal should stand on its own merit. As a final check, the grantsman acting as coordinator might want to run down this list:

- Use a team approach in the total proposal process rather than a one-man show.
- Study pertinent guidelines and regulations drafted by the federal agency.
- Consult the funding agency for information within legitimate bounds and get to know its program staff.

- Appoint a steering committee to oversee the proposal project and to make up schedules and timetables for the staff; and monitor their progress closely.
- Assign tasks to staff members on the basis of their skills, specialties, and willingness to cooperate.
- Define needs clearly after a thorough appraisal of the local picture; keep in mind the larger national scene.
- Research the general topic in order to collect useful back-ground data.
- Involve professionals from the sponsoring institution and members of the local community in the planning and development stages.
- Ask outsiders to comment on the proposal's first draft.
- Select one person to write the proposal in clear, concise English without verbal padding.
- Ensure that the total package addresses the key proposal requirements: justification, objectives, procedures, evaluation, and budget
- Develop and submit a proposal that, if accepted, can be managed.
- Mail or hand carry the proposal to the funding office on time because a missed deadline means automatic rejection.

Fortified with the checklist, the grantsman can design his own game plan for developing a proposal of substance and merit. While these pointers cannot guarantee a grant, they can help take the guesswork out of grantsmanship.

APPLICATION REVIEW: HOW IT'S DONE

Most grant applications get dropped, prayerfully, into a mail box or handed, again prayerfully, to a post office attendant. Some are turned over to the package delivery service of an airline and a rare few are hand-delivered to the Washington agency itself. No matter under what conditions the applicant parts with his application to send it forth for official judgement, that moment for him is likely to be one of expectancy and doubt.

Mostly he (or she) is wondering, "Will it be funded?" But behind that basic question, others follow. Will it be lost in the mail? Will it be lost within the Office of Education bureaucracy? Will it be read by fair-minded intelligent reviewers or by those with an unpredictable bias? Will they notice that all the selection criteria were met? Will they read the last page? Will they read the application at all? Will it be rejected because it isn't slick? Or the budget is too big? Or not big enough?

The weeks pass. After the postcard from the Application Control Center at the Office of Education arrives to notify the applicant that his application has been received and assigned a number, the silence from the Office of Education is deafening. No word. A curtain has fallen between the applicant and his application. All he can do is wait.

Three Grants Programs

But that curtain moves and can even be lifted a little. While the specific story of a particular application, who read it and what they thought, will never be told, the general story of what happens to applications to a particular program can be. In this article we will look at three grants programs, the Teacher Corps Program, Consumer Education Program (both in OE) and the Elementary and Secondary Education Program of the National Endowment for the Humanities. We'll look with care at how reviewers are selected and trained (if at all) and how the final selection of applications is made.

Some applications are weeded out immediately. These are the ones that were submitted to the wrong grants program, that omitted material required in the program's regulations, that are from ineligible applicants or that did not include the clearances required.

Applicants whose proposals were rejected for one of these reasons are sent letters telling them why the rejection occurred, and are returned the original copy of their application. The rest of the applications proceed to the next stop, the review process.

Discretionary grants programs in the federal government have some latitude in how they design the selection process they wish to use. The Office of Education, however, has perhaps the least. Applications submitted to an OE program must be reviewed according to procedures described in Section 2 of Part III of the OE GRANTS AND PROCUREMENT MANAGEMENT MANUAL.

On second glance, however, the situation gets more complicated. In fact, while Section 2 of Part III exists, the manual, as a complete document does not. Work on the manual, according to

This article originally appeared in the September 12, 1978 edition of Education Funding News and has been reprinted with permission from the Education Funding Research Council, 752 National Press Building, N.W., Washington, D.C. 20045

Robert Arnot of the OE Office of General Counsel, was begun several years ago and never completed. This makes the legal status of Section 2 of Part 111, he observed, "Kind of unclear."

Setting aside the sticky question of whether OE directors were absolutely required to follow the Section 2 procedures, Arnot stressed that Section 2 procedures "are generally followed as far as I know." In this article when we say "OE must" we are assuming the MANUAL procedures are mandatory. They may not be.

In a few months, however, this situation will end. Sometime in December or January the Office of Education expects to publish the grants selection procedures for the first time in the FEDERAL REGISTER to give the public an opportunity to comment on the Section 2 provisions. The procedures will appear as a proposed regulation to be added to the General Education Provisions Act (GEPA) regulations which guide OE in most of its administrative responsibilities. Eventually, the proposed rule will become final and the procedures, as amended by the requlatory process, will become binding on OE.

For the National Endowment for the Humanities, on the other hand, there is not even a draft manual. According to NEH's General Counsel Office, no document exists which lays out the Endowment's grant selection procedures in any detail.

SELECTION OF APPLICATION REVIEWERS

Who Reviews?

The first step in the selection of applications is to choose people from outside the program staff to read the proposals. Each OE program is required to maintain a file of potential reviewers and include in it the names of any who request that they be considered.

Both Dr. Carolyn Gillian, Chief of the Cycles Operations Branch of the Teacher Corps program (Editor's Note: Dr. Gillian recently left her job at Teacher Corps to become the new OE Regional Commissioner for Region IX in San Francisco) and Dr. Dustin Wilson, Director of the Consumer Education Program, keep such files. Dr. Wilson told EFN, he is "searching all the time" for new reviewers. NEH keeps a file as well.

The selection of the reviewers is the director's job. Both OE directors seek to make their final group (33 or so, in the case of Teacher Corps, 60 in the case of Consumer Education) representative of the country as a whole but the standards used vary according to the program. In Teacher Corps, urban, rural and ethnic characteristics make a difference. In Consumer Education, sex, age, race and geography play a role. Somewhat unhappily Wilson noted, "Expertise comes last because representativeness is so important."

"It's hard to get people to come spend a week to read proposals. Because of the amount of time we need to ask them to spend, we can't always get the really qualified people to come."

- Dr. Dustin Wilson,
Director of the
Consumer Education
Program

The Elementary and Secondary Education Program in the Endowment also seeks to make its panel of 13 readers representative but less of the nation as a whole than of the type of applications submitted. Since the program funds projects to improve the teaching of subjects all across the humanities, NEH staff tries to include on the review panel individuals whose areas of subject knowledge match the areas dealt with in the applications, to the extent possible.

NEH also tries to have the panel reflect the types of applicants in proper proportion. In a year with a large number of applications from school districts, a large number of reviewers from school districts will be on the panel. Last year roughly 15 percent of the proposals were from LEAs.

In drawing up their list of readers, the directors must also think about whether their readers were reviewers the year before. The GRANTS MANUAL forbids an OE program from using more than 67 percent of the reviewers from the previous funding cycle the next time around and no individual may serve more than two years in a row. In the NEH program, the ratio of experienced to inexperienced is usually smaller. According to Crale Hopkins, a program officer there, the percent of experienced reviewers is usually not more than 20 percent and can be as low as 5 percent.

While no staff person from the grant program may serve as a reviewer, as many as one-third of the reviewers may come from inside the Office of Education. At the Endowment, all of the reviewers come from outside the agency.

OE also requires that its reviewers have no conflict of interest regarding any proposals they read. Most often, the issue of conflict of interest is raised when a reviewer discovers that one of the applications he or she has been assigned to review has been submitted by an organization for which the reviewers is serving as an officer, trustee, or employee.

Under such circumstances, the reviewer is asked by OE to declare his conflict of interest and is requested to read a different application.

Hard Work

Are good reviewers hard to find?
Dustin Wilson of the Consumer Education program told EFN, "It's hard to get people to come spend a week to read proposals. Because of the amount of time we need to ask them to spend, we can't always get the really qualified people to come."

The NEH Elementary and Secondary Education Program solves that problem by sending the applications to the reviewers and letting them read them at their leisure. Using this approach, NEH is able to use reviewers who might otherwise not have the time.

No matter what method is used, the selection of reviewers is a very important process. Wilson believes that for a discretionary grants program it is probably "the most critical issue." In awarding a contract, he explained, the program staff can exercise some continuing control over the quality of the work being done. But in a grant program, essentially all control ends once the grantee has been chosen. Wilson believes the better job the reviewers do in reading and scoring the applications, the better chance there is that the projects funded will be successful.

Orientation

Once the reviewers have been selected and have agreed to read proposals, they are ready for orientation. For the Endowment program, there is virtually nothing done. The reviewer is simply sent a copy of the program's guidelines (the same used by the applicant) and some instructions along with the 20 or so applications he or she must read.

The instructions include a series of questions which reviewers may wish to consider in commenting on the proposal. The questions cover three areas: the substance of the idea proposed and how well it fits in with the purpose of the grants program, the proposal's realism and practicality, and the resonableness of its budget.

Orientation for OE reviewers is somewhat more substantial. For both programs, the reviewers are brought to Washington to read the applications and spend the first morning at an orientation session. They have already been sent copies of the program's regulations and law, which, Wilson notes, "they don't read." The morning session is spent listening to the directors provide background on the program, discussing the program's further priorities and having procedures explained.

Advice Problem

Just how much advise to give readers is always a problem, both OE directors admitted. "If we tell them too much," Wilson said, "they'll look for what we told them to look for and ignore other things in the proposal that might have been equally important."

Another problem is how to define what is innovative. Innovation, Gillian pointed out, "tends to be regionally defined." If the national office were to try to define it, she explained, it might lead to some truly innovative projects (as far as their region is concerned) being too harshly scored by the reviewers.

Some programs try to address these problems by giving the reviewers an opportunity to practice. One year the Teacher Corps Program gave the readers a sample application to review, and the results were compared and discussed. This process, however, was not used again because it "exhausted everyone," Gillian said. Other grants programs such as the Ethnic Heritage Program have used similar practice exercise, however, with good results.

This year the Teacher Corps Program used yet another method. A group of applications to teams of four reviewers each. Each application was read by all the members of the team. To test for quality of team reading, each team was told to pass one of its applications to another team to be read. The staff then compared the first team's recommendations with the second team's to see if there was a significant discrepancy. The method worked well, according to Gillian. This past year when a great difference was found between two team's recommendations the staff discovered that one of the teams had failed to notice that a page was missing from the application.

The GRANTS MANUAL requires that an application for any OE program be read by at least three reviewers. At the Endowment's Elementary and Secondary Education Program three reviewers per application is also the rule. As a result, every application that is reviewed has three technical review forms filed with it. Copies of these forms, with the reviewer's comments showing but their names deleted, must be made available to any applicant who requests to see them. This is a requirement of the GRANTS MANUAL and is the policy of the National Endowment for the Humanities.

Both agencies share reviewer's comments because it is required of them under the Freedom of Information Act. Passed in 1967, the Act has had great impact on the grant selection process. Because reviewers' comments are now made public, the program staff must put increased pressure on the reviewers to make their comments as substantial and solid as possible.

Nevertheless, not all reviewers meet the challenge. Wilson noted that some reviewers are too indiscriminate to be useful. One reviewer, he said, wrote on his form of one application, "A gold-plated Cadillac. Don't fund this one. A real loser." "The higher quality proposals you get in," Hopkins said, "the less susceptible the program is to political pressure."

- Crale Hopkins, of
National Endowment for
the Humanities' Elementary and Secondary Education Program

Reviewers can also be inaccurate. When this happens it is usually because in checking over the list of things to be included in the application, described in such detail in the regulations, the reviewer failed to note that something was missing or failed to find something that was there. This second error is often partially the application's fault. A poorly organized application can be very confusing to read. Being mortal, the reviewers don't always find all the pieces they are looking for.

Inaccuracies are usually caught by one of the other reviewers during the discussion of the application following their individual readings, but if they are not caught, they may go unnoticed by the staff. "The number of applications we are dealing with," Wilson said, "makes it hard to catch a reviewer's mistakes." Well organized applications that have their different sections labeled to match the criteria called for in the regulations are extremely competitive for this reason.

"Reading proposals is a hard job," Wilson added. "Less than a fourth of the people we use are good at it. Reviewing proposals requires thinking negatively or critically and most educators don't think that way."

Rating Grant Applications

Most of the grants programs in the Office of Education award points to applications according to how well they meet the published review criteria. If points are

awarded, the number of points for each criterion must be published in the FEDERAL REGISTER in the program's regulation. Each criterion is also listed, along with its maximum point value, in the "technical review form" that each reader must fill out for each of the applications he or she reads. The readers only, and not the staff, may assign the points, based on their understanding of the application and how well it fits the criteria.

The use of a point system is highly recommended but not required by the OE GRANTS MANUAL. The MANUAL gives little advise on how a program ought to instruct its reviewers if no points are used. It simply states that the reviewers must indicate whether or not they recommend funding for each application reviewed.

There can be no question that the use of points in the OE selection process has "tightened up" the process. While the staff has the responsibility of writing up a review summary for each application and making recommendations to fund or reject the application, the summary, in the words of the MANUAL, "must be consistent with individual technical reviews." The director of the program then use the summaries to rank order the applications. His ranking must be based solely on the scores of the reviewers. Commented Wilson of the procedures, "We have to stick strictly according to ranking of points."

Sometimes an excellent proposal will be rejected because it was submitted by what OE calls "a high risk applicant." The Manual lists six ways to identify such an applicant.

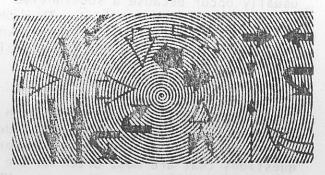
While the directors may not always welcome this limitation, it does, Wilson pointed out, have its advan-

tages. Every grants program must deal with pressure to fund a particular applicant that comes from a member of Congress, a mayor or a governor. "We have to be able to say...why we're cutting out the proposal they want funded. The point system makes our reasons clear."

The Humanities program is also put under political pressure. Not using points, the program has to depend instead on the quality of comments provided by the reviewers on their review forms. Nevertheless, Crale Hopkins pointed out, "it is most difficult for a program staff to resist such political pressure if there is still some money left to be allocated after all the clearly good proposals have been funded." "The higher quality proposals you get in," Hopkins said, "the less susceptible the program is to political pressure. You can say to whomever asks, 'But there were all these good proposals that were even better than this one. ' "

Deviations

Despite the requirement that OE programs rank applications by points, there are always some applications funded whose scores were too low or whose scores were higher but were not funded. These deviations, however, must be explained. The staff may make a recommendation that differs from the technical review but such a recommendation, the MANUAL says. "must be based solely on the published program evaluation criteria and program priorities and justified in writing."



The director of the program must also explain any discrepancies in the ranking and funding recommendations in his memo to the Commissioner in which he requests that certain applications be approved.

Why would an application get a higher score and not get funded? "Sometimes a terrible proposal might get a very high score for some reason." Wilson observed. "Then it wouldn't get funded but that would have to be explained and be well-documented, and there would need to be a ruling on it from the deputy general counsel."

Sometimes an excellent proposal will be rejected because it was submitted by what OE calls "a high-risk applicant." The MANUAL lists six ways to identify such an applicant. Included in the category are applicants whose finances are unstable, who are inexperienced in receiving federal grant awards, who are dependent on federal support (i.e., 80 percent of its revenues are from federal sources), who have performed unsatisfactorily with grants in the past or who are advocacy organizations whose purposes "diverge from or conflict with" those published in the program's rules and regulations.

The decision on whether or not to fund a "high-risk applicant" that has one of these six characteristics is made by the Director of the Grants and Procurement Management Division of OE, and may involve the attaching of special terms and conditions to the award. Advocacy groups whose purposes conflict with the program's can only be funded with the approval of the Secretary of Health, Education and Welfare.

Geography

Geographical distribution is another reason a high scoring application might get rejected and a low scoring application get funded. Some of the OE programs,

Teacher Corps among them, make the funding of applications from all of the regions of the country a top priority. The process works like this. First the applications are stacked in the order of their scores, those with the highest scores placed on top. A score is established as the cut-off score, below which no applications will be funded. There are sufficient funds to support all the proposals above the cutoff score.

Then the top ranked applications are sorted in piles, one pile for each of HEW's ten regions. Gillian, the director, then looks at the distribution. What she finds is that there are not enough high ranking applications (proportional to that region's population) in one region and too many in another. She will then remove from the pile with too many the lowest of the high ranking and add to the other pile applications whose scores fell below the cutoff point and are from applicants located in that region short on high scoring applications.

"I never have to do any dipping below the cutoff score." Gillian noted, "except for the reason of equitable distribution." The dipping process, she said, tends to mean that applications from sparsely populated regions may often have to score higher in order to be funded, while applications from urban areas can score lower and still receive a grant.

In the grants programs where points are not awarded, such as the Humanities Elementary and Secondary Education Program, the agreement of the reviewers decides an application's fate. In the Humanities program, after the reviewers have been given six weeks to read their 20 applications, a two-day meeting is held in Washington. There the three readers of each proposal discuss their recommendations and arrive at a consensus on whether to recommend the proposal for funding.

That consensus is arrived at, however, with the assistance of the staff. Unlike the OE staff, the Endowment staff tend to know a good deal about many of the proposals being reviewed, having worked with the applicants on developing their applications as part of the program's pre-application process. The staff share their "background knowledge," Hopkins explained. at the reviewers' meeting and try to "correct reviewers' misunderstandings" if something has been misunderstood. There is no doubt that the Humanities staff has a greater opportunity than does the OE staff to influence which applications get funded.

Most often, the three readers agree on whether to recommend an application for funding, but if they cannot, their divided recommendation is reported to the National Endowment's Council, which must approve all funding decisions. The Council is provided with copies of the reviewers' comments on all proposals recommended for funding, and with brief descriptions of those proposals that have been rejected. The staff summarize the reviewers' conclusions on each application and add comments of their own.

Meeting four times a year, the 25 member Council makes the recommendations for funding to the Director of the Endowment, who has final responsibility. According to Hopkins, it is rare for the Council to reverse a recommendation made by a reviewers' panel and such reversals usually occur because a substantive policy question is involved. Thus the reviewers, assisted by the staff's knowledge, most often make the final decision.

Grantsmanship

Having considered how an application gets selected for funding under three federal grants programs, we can try to answer two questions that are most often on the mind of nervous applicants. These are, "Does quality count?" and "Does grantsmanship help?"

Quality does seem to count but it is important to consider in what way. Because reviewers assign points or make recommendations based on their reading of a typed manuscript, the qualities that help a proposal the most are those that are best communicated on paper. A proposal that has been developed for more than a year and has broad-based support within a district and has been carefully thought out could be called a quality proposal, but if the reviewer cannot discover those things from the words he or she reads, then that proposal could get a low score. For this reason, how well a proposal is organized and how clearly it is written can make an enormous difference in whether or not an otherwise fine proposal is funded.

Few Merits to Grantsmanship

If grantsmanship is defined as the ability to produce a well-organized and well-written proposal, then grantsmanship does make a difference. Program officers within OE and the Endowment however, used the term "grantsmanship" to mean something else. To them, it connoted the ability to write long-winded, fancy-looking proposals that used many vague educational terms which laymen would have difficulty understanding.

All three program officers indicated that such slickness was not appreciated. Said Hopkins, "We wince at the slick proposals and are very open to those that are clumsy but honest."

Grantsmanship can also be defined as being able to apply personal or political pressure on the grants program staff at the right moment. None of the three program officers interviewed felt that this helped a proposal's chances either. Encountering this expectation often, Gillian said, "I'm embarrassed. Some people think I have the power. I don't." The extensive

use of the points system also seems to work against the possibility that pressure can make a difference. Unexamined in this piece, however, is the extent to which the requirements of the GRANTS MANUAL are ignored. Clearly, in the case of the Endowment's program, if the staff does not know your proposal well, confusions and criticisms raised by reviewers might go unanswered.

It is six months later and the expectant. doubtful applicant has almost (but not quite) forgotten about this pending application. Then the rejection letter arrives, and discouragement sets in. What went wrong? The temptation is not to try to answer the question but to put the whole experience aside and try to forget about it. But some answers, although not always very imformative, are available for the asking. It is always worthwhile to find out what the reviewers have to say. As mentioned earlier, under the Freedom of Information Act, every grants program is required to supply the applicant with copies of the reviewers' comments (though not their names) on request.

Sometimes the truth can be painful. Observed Gillian, "Often a proposal doesn't make it because of one of the three groups (community, university and local education district) we require be included in the writing of the proposal weren't included." Another variation of this problem are those applications, she continued, from LEAs that saw the university as a service instead of a partner to work cooperatively with. "Those one-sided programs jump out at you."

Omissions are another reason for rejection. Proposals will make assertions. "We concluded that..." without documenting the basis for the conclusions in the proposal. Or they will include an evaluation plan but place it in a section of the proposal where it went unnoticed by the reviewers.

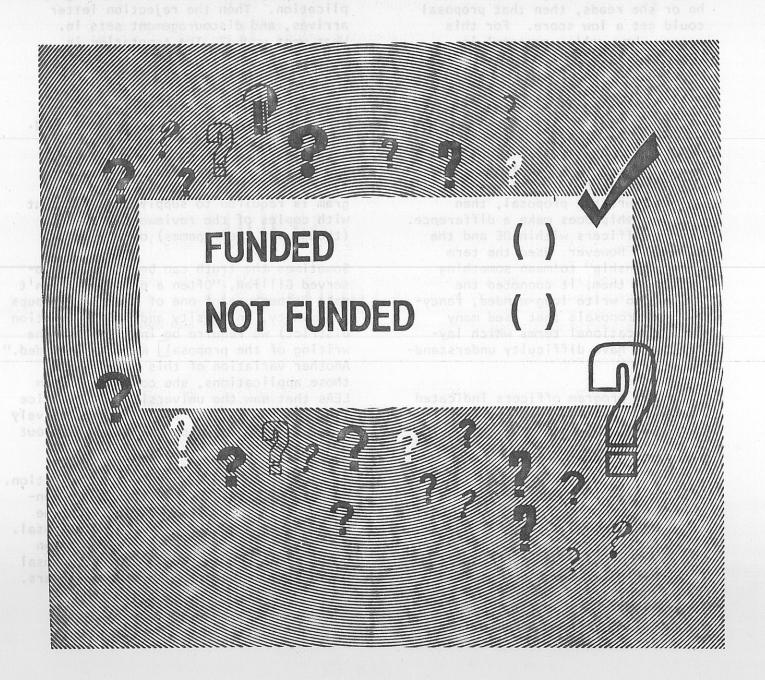
Persistence

Having learned something from the process by reading the reviewers' comments and talking with the program officer, it is sometimes easier to generate the energy to apply again.

Knowing what experiences your application has been through can also help. Finally, there is insight and renewed determination to be gained from reading other people's proposals. Whether

as a formal reader for a grants program or as a curious friend or stranger, prospective applicants can learn a good deal from observing what mistakes and what successes other authors of proposals make. And an applicant who can think like reviewer may soon find himself (or herself) thinking like a grantee.

- By Lucy Knight



CHECKLIST FOR PROPOSAL WRITERS

The following is a set of materials and information which anyone involved with writing proposals ought to have at their fingertips:

- 1. Copies of the organization's by-laws, charter, personnel policies and procedures, annual report, and a copy of the most recent financial statement. If incorporated, the writer should have multiple copies of the organization's IRS designation as a tax-exempt entity (501(C)3).
- 2. Current budget and sources of financial support.
- 3. Newspaper articles indicating organizational credibility and other documentation of the major accomplishments of the organization.
- 4. Copies of previous proposals written, and proposals of related efforts (locally or nationally).
- 5. Copies of materials concerning parallel efforts elsewhere.
- 6. Job descriptions of current staff, as well as for staff needed to implement proposal.
- 7. Resumes (updated) of all staff and potential staff/consultants.
- 8. Comparability surveys to assist in determining "appropriate" line items for personnel within the budget of the proposal.
- 9. G.S.A. catalog or equivalent catalog for pricing supplies and equipment.
- 10. An adding machine.
- 11. Demographic information about your area, related statistical data such as surveys, studies, evaluations, census runs, research, etc.
- 12. Legislation, policy statements, instructions, grant application procedures, etc. of all organizations to which you might submit proposals for funding.
- 13. As much information as is available about a funding source, including personnel or professional data about people reviewing your applications, and those who have decision-making responsibilities regarding funding.
- 14. A copy of Roget's Thesaurus and a good dictionary.
- 15. A copy of this checklist kept in a place where it won't get lost.

FUND RAISING CHECKLIST

To be an effective fundraiser, you must develop a system of knowing where you are and where you should be with each funding source. With that in mind, this checklist can be used or redeveloped to fit your own experiences:

	al report, and a copy of the most recent financial statements.	YES NO	DATE		
1)	Has letter gone out requesting guidelines and priorities?		93.3 		
2)	Has research been done on the following information:	rent budge			
	General Information (address, phone, contact person) Board Members (foundations, corporations) Current Funding Priorities Financial Status (assets, gifts given, etc.) Largest and smallest grants given in area of interest History of funding source	ngaper and John of the Mark of Bri	00 11 00 11		
3)	Do you understand the budget for your program?				
4)	Can you explain the goals and objectives of your program?				
5)	Have you planned for annual reports to funding sources?				
6)	Are you prepared for an interview?	ri <u>lli</u> dsi <u>so</u> r	MP8		
7)	Is your fundraising package together?				
	Papers of Incorporation Proof of Tax Exempt Status (501(C)3) Plans for future funding Annual Report and/or Documentation of Program Letters of Support	addev mac addrev mac addrepada			
8)	Do you know application deadline dates for funding sources?	naidalair	est. Cr		
9)	Do you know when decisions are made on applications and when you will receive notification?	nuch info	eA LET		

FUNDING SOURCE

FACT SHEET

		DATE:	
		PHONE:	
NAME:			and the state of t
Consequence of the consequence o			and the second
ADDRESS:			TAMES AND ASSESSED OF THE SECOND
PROGRAM TITLE:			
APPLICATION BY:		(check appropriate lines)	
	General Letter	or Application Form	On file
ACCURATION TO THE REAL PROPERTY OF THE PERTY			
SCHEDULE:	Deadline Dates	Board/Panel Meets	ishbereq
or			en de la companya de
COMMA COM DEDCOM	Appeals Preferred		
CONTACT PERSON	N(S) AND TITLE:		
			THURSDA
CDECTETO INFO	DAMES OF CHANGE		2355 878 1350
SPECIFIC INFOR	RMATION REQUIRED OF GRANTEE:		TIGOTPAN .
FUNDING PRIORI	TIES AND ISSUES:		: EMODPUO DUTQUUE:
TOWDING TRICKS	TITE UND TOPOGO.		33300000000000000000000000000000000000
egyptyjene grane grane de maner en	DENTIED		CEVORERA
Consultant	0	1 151	
MAXIMUM GRANT	GIVEN:	MINIMUM GRANT GIVEN:	9380
	IN INTEREST AREA:	A STATE OF THE STA	
	MENT: 48 (8008691 #890991)		
	Polymi marperg\ [saogorg yel	THE PERSON AND THE PE	
	and other possible funding		ndo Avona
340	e Annual Repo	. Application Form	sort follings
(Attach additi	onal information, i.e., Trust		

any known personal contacts, etc.)

(48)

FUNDING SOURCE

CONTACT SHEET

-: DTAG	DATE:	
NAME:	NAME:	
CONTACT:	ADDRESS:	
DV MINOM		
BY WHOM WITH WHOM		
MANNER (check appropriate lines)	MATTER MATTER	
Phone	General Information*	
Letter	Arrange Appointment	
PersonalalgoM Ignsq\Ducon	Proposal Submission	
REQUEST:	COMTACT. PERSON(S) AND TITLE:	
AMOUNT		
MANNER		
NATURE	SPECIFIC INFORMATION ARGITABLOF GRANTEE:	
Total Control of the		
FUNDING OUTCOME:		
APPROVED	DENIED	
Date		
Amount	NEXTHUM GRANT CIVER:	
Follow-up	MAXIMUM CLUMT IN INTERREST AREN:	
(letter of appreciation,	(request reasons, suggestions	
program report, final	for proposal/program improvement,	
report, etc.)	and other possible funding sources)	
*Guidelines, Application Form	ns, Annual Report	
Other (specify)	(Attach additional information, 1.6., Trust	

DENNIS PAUL
DEVELOPMENT OFFICER
CITY OF NEW YORK
DEPARTMENT OF CULTURAL AFFAIRS

FUNDING BIBLIOGRAPHY

GOVERNMENT

* Catalog of Federal Domestic Assistance

Contains detailed information on every domestic program, including who's eligible, how to apply and deadlines.

Superintendent of Documents
U.S. Government Printing Office
Washington, D.C. 20402
\$ 20/year

Federal Register - stoke has been privated by a set builded tappage and

Published daily Monday - Friday this publication contains all rules and regulations, proposed and final, and closing dates for submission of proposals. It is generally recognized as the single most important publication for persons responsible for federal programs.

Superintendent of Documents
(same as above)
\$ 50/year
Catalog # GS 4.108

"The Federal Register: What It Is and How To Use It"

Explains how to read the Register.

Federal Bookstore
26 Federal Plaza
New York, N.Y. 10007
(212) 264-3825
@ \$2.50

Commerce Business Daily -

Lists all potential contracts federal agencies plan to initiate, contract awards that exceed \$25,000, upcoming sales of government surplus property and most Request for Proposals (RFP's) daily.

Superintendent of Documents \$ 80/ year 2nd class \$ 105/ year 1st class Catalog # CT 57-20

* U.S. Government Manual -

Is the official handbook of the federal government. Every department, agency, commission and quasi - governmental organization is described, with agency addresses, telephone numbers and the names of key personnel listed.

Superintendent of Documents, or Federal Bookstore \$ 7.50

* These publications are available at the Resource Center.

* Cultural Directory: Guide to Federal Funds and Service for Cultural Activities -

Revised edition available February, 1980.

Smithsonian Press 900 Jefferson Drive, S.W. Washington, D.C. 20560 \$ 8.00

* Management Circulars -

<u>A - 95</u> - Clearinghouse procedures, companion handbook describes the clearinghouse concept and the PNRS - Project Notification and Review System.

Federal Circular A - 95: What It is and How It Works - This item describes the concept behind the A - 95 Clearing houses, and explains the PNR system.

Both are available from:

Intergovernmental Division
Office of Management and Budget
Executive Office Building
Washington, D.C. 20503
Free

 $\underline{A-102}$ - explains administrative requirements for grants for state and local governments.

74 - 4 - describes direct and indirect costs for state and local governments.

A - 110 - applies to grants to private nonprofit organizations.

 $\underline{A-111}$ - applies to jointly - funded assistance to state and local governments and nonprofits groups.

These circulars include sections on grant payments, matching shares, financial management and reporting, use of income generated by a grant, purchasing and bidding, revising budgets, closing out a grant, etc.

Publications Office
Office of Management and Budget
726 Jackson Place, N.W.
Washington, D.C. 20503

When ordering publications from the Government Printing Office include: (1) order date, (2) full title (including year or volume number), (3) GPO Catalog or Stock Numbers, (4) price per copy, (5) number of copies, (6) complete address to which items are to be mailed, and (7) remittance in the form of check or money order payable to the Superintendent of Documents.

Use a separate order sheet for each title requested and send orders to:

Superintendent of Documents
U.S. Government Printing Office
Washington, D.C. 20402

FOUNDATIONS

The Foundation Center
888 Seventh Avenue (26th Floor)
New York, N.Y. 10019
(212) 975-1120

Has annual reports of more than 400 foundations, copies of IRS reports, etc. Use of the library facilities are free. An orientation is held every Tuesday morning at 9:30, call in advance. Open Monday through Friday, 10:00 - 5:00.

* Foundation Directory -

Is the basic resource for information about the country's major foundations. The data is arranged by state, fields of interest and alphabet. The 7th Edition (1979) is now available.

Columbia University Press 136 South Broadway Irvington, N.Y. 10533 \$ 41.50

* Foundation News -

Is the bi-monthly magazine of the foundation world. The center section of each issue contains the Foundation Grants Index, a listing of grants of \$5,000 or more by name and location of recipient, description of the grant, and the grant identification number. Each year an annual Index is compiled and published separately.

Foundation News 888 Seventh Avenue New York, N.Y. 10019 \$ 20/year

Foundation Grants Index Columbia University Press 136 South Broadway Irvington, N.Y. 10533 \$ 20/year

The Foundation Center National Data Book -

Provides material on thousands of small foundations not listed in the Directory. This two volume set lists information by foundations alphabetically (vol.1) and by state in descending grant amounts (vol.2).

Foundation Center
888 Seventh Avenue (26 Floor)
New York, N.Y. 10019
(212) 975-1120
\$ 40.00

CORPORATIONS

Most corporations publish Annual Reports which are usually available on request.

Fortune 500 Directory -

Time, Inc.
Time and Life Building
541 North Fairbanks Court
Chicago, Illinois 60611

cost unknown

Standard and Poors Register of Corporations, Directors and Executives - 3 vols. 1979

Standard and Poors Corporation
25 Broadway
New York, N.Y. 10004
(212) 248-2525
\$ 198/year

* A Guide to Corporate Giving in the Arts -

Profile listings of corporations throughout the country involved in giving to the arts.

American Council for the Arts Publications
570 Seventh Avenue
New York, N.Y. 10018
(212) 354-6655
\$ 12.50

* Corporate Fund Raising: A Practical Plan of Action -

Description of the Greater Hartford Arts Council's combined fundraising campaign.

American Council for the Arts Publications
(same as above)
\$ 12.50

INDIVIDUALS

Who's Who in America -

A.N. Marquis Company
4300 West 62nd Street
Indianapolis, Indiana 46288
cost unknown

PERIODICALS

* Grantsmanship Center News -

Contains in-depth information regarding both public and private funding. It includes numerous basic how-to articles, as well as case histories, interviews, news and information about deadlines, new grant programs, etc. Outstanding articles are made available through a highly recommended Reprint Series. Particularly relevant Reprints:

Basic Grantsmanship Library
Guide to Accounting for Nonprofits
Researching Foundations
The Big Search - Researching Foundations, Part II
Guide to PR for Nonprofits
How Foundations Review Proposals and Make Grants
How to Develop a Fund-Raising Strategy
The Process of Program Evaluation
Program Planning & Proposal Writing (expanded version)

Grantsmanship Center
1031 S. Grand Avenue
Los Angeles, Ca. 90015
News - \$ 15/year (bi-monthly)
Reprint prices vary

Fund Raising Management - Company to the Company of the Company of

This commercial publication contains information of interest to the professional, such as computerized mailing lists, capital campaigns, design of direct mail pieces, etc. It also has numerous ads about direct mail lists, volunteer and donor recognition items, conferences, etc.

Hoke Communications
224 Seventh Street
Garden City, N.Y. 11530
\$ 12/year (monthly)

GENERAL REFERENCE MATERIALS

Accounting and Financial Reporting / Budgeting -

Are two publications put out in 1974 for their member agencies; they are easy to understand and cover most of the key accounting questions asked of nonprofit organizations.

United Way of America 801 N. Fairfax Street Alexandria, Va. 22314 \$ 15 and \$ 10, respectively

Developing Skills in Proposal Writing -

This benchmark book has recently been issued in an expanded edition. Its strength still rests on the step-by-step proposal journal description.

Continuing Education Publications
1633 S.W. Park
Portland, Oregon 97207
\$ 12.50

Evaluating Action Programs - Daniel Balance

Is a series of essays about evaluation. It aims to assist people conceptualize and understand the purposes of evalution and the methods by which to obtain information and generate conclusions.

Allyn and Bacon, Inc. 470 Atlantic Avenue Boston, Mass. 02210 \$ 7.95

* Getting Your Share -

Is an introduction to fundraising. It contains suggestions for meeting and negotiating with foundations, a list of change oriented foundations, a proposal check list and a bibliography.

Womens Action Alliance 370 Lexington Avenue New York, N.Y. 10017 \$ 2.00

Giving USA 1979 Annual Report -

Is a compilation of facts and trends on American philanthropy published each May with the previous years figures.

American Association of Fund Raising Council, Inc. 500 Fifth Avenue New York, N.Y. 10036 \$ 10.00

Grants: How to Find Out About Them and What To Do Next -

This well written book covers all phases of proposal writing and research of funding sources comprehensively. This is an excellent introduction to grants-manship but is of value to experienced people as well.

Plenum Publishing
227 West 17th Street
New York, N.Y. 10011
\$ 19.50

Grass Roots Fund Raising Book

The definitive book on the subject. Good for both beginning and experienced fundraisers.

Youth Project 1000 Wisconsin Avenue, N.W. Washington, D.C. 20007 \$ 5.25 prepaid

"The Money Maze: Finding Your Way Through the Educational Funding Network" - Nov. 1977 issue of Options in Learning -

Slanted to education but includes a fine guide to a broader range of federal programs, guidelines for approaching corporations, data on foundations, and good information about the proposal writing/technical assistances resources of the Board of Education.

New York Urban Coalition
1270 Avenue of the Americas
New York, N.Y. 10020
Free

Fearon Publishers
6 Davis Drive
Belmont, Ca. 94002
\$ 4.25

"Sources of Information on Proposal Writing and Possible Funding" -

A comprehensive annotated bibliography. Includes about a dozen books devoted to proposal writing. Lists a wide range of relevant federal publications.

U.S. Department of Labor
Women's Bureau
Washington, D.C. 20210
Free

Standards of Charitable Solicitation -

Guide to nonprofit fundraising methods, advertising and public disclosure of financial operations.

Helen O'Rourke
Director of Philanthropic Services
Council of Better Business Bureaus, Inc.
1150 17th Street, N.W.
Washington, D.C. 20036
\$ 1.00

What Will A Foundation Look For When You Submit a Proposal?

Gives the view from the foundation side of the desk: organizations need to do their homework before submitting a foundation proposal.

The Foundation Center 888 Seventh Avenue New York, N.Y. 10019 Free

GENERAL TECHNICAL ASSISTANCE

Citizen's Committee for New York City
3 West 29th Street
New York, N.Y. 10001
(212) 578-4747

Patricia Allen will review proposals of small organizations, mainly those that focus on youth programs. Inquiry should be made by phone. In addition the Committee has produced valuable publications:

"Basic Proposal Outline" (.50)

"Federal Grantsmanship for Neighborhood Groups" (.50)

"Funding Neighborhood Programs" (1.25)

A new publication, "Youth Book Models and Resources for Youth Programs," listing 250 programs (many arts related) will be available in February 1980. (\$3.50)

Community Service Society 105 East 22nd Street New York, N.Y. 10010 (212) 254-8099

Will provide help with concept evaluation, proposal structure, and general organization development to community planning, health and school boards as well as to community organizations. Your request in writing should be addressed to the director.

Greater New York Fund Community Service Department 99 Park Avenue New York, N.Y. 10016 (212) 557-1068

Lenore Glickhouse will provide information/consultation by phone, focusing mainly on Health and Social Welfare organizations. She will also review proposals, which requires a group to call first. There is a waiting list and you should allow time for this in your scheduling.

New York Community Training Institute
349 Broadway
New York, N.Y. 10013
(212) 431-6964

The Institute has been designated by the New York City Community Development Agency as the primary training mechanism for CDA funded programs.

They will review a group's concept and assist with special problems on a limited basis.

Urban Coalition Community Outreach Department 1515 Broadway New York, N.Y. 10036 (212) 921-3539

This department will provide technical assistance with fundraising as well as proposal review. A written inquiry should be sent to the Director, Jose Ferrer.

Womens Action Alliance 370 Lexington Avenue New York, N.Y. 10017 (212) 532-8330

Wanda Wooten will provide proposal review; there is a \$5.00 service fee. Call for further information.

SOURCES FOR STATISTICS

City Planning Commission -

"Community Portfolio Fact Books" for each of the City's 59 Community Planning Districts include information about the local district service cabinet members; and family, racial, educational, income and age data. The Fact Books (1977) are exhausted for some districts, an updated printing is not yet available. Prepared and distributed by:

City Planning Commission Publications Office 2 Lafayette Street New York, N.Y. 10007 (212) 566-1902

They are .25 for each district if picked up at office, or .50 if ordered by mail.

The City Planning Commission also published, "Community School District Profiles," with demographic data organized by school district, \$2.00

The Commission has branch offices in each borough; they may be able to help you with a data question:

Manhattan - 2 Lafayette Street (212) 566-0522 Bronx - 215 East 149th Street (212) 993-8400 Brooklyn - 185 Montague Street (212) 834-9855 Queens - 29-27 41st Avenue, L.I.C. (212) 264-0630 Staten Island - 56 Bay Street (212) 727-8453

Census data may be found at any public library or:

Department of Commerce Library 26 Federal Plaza Room 3710 New York, N.Y. 10007

(212) 264-0630

They will enough phone questions limited to 3 minutes

epartment of Cultural Affairs ity of New York 30 Fifth Avenue ew York, New York 10021 12 360 8125

(SAMPLE GOVERNMENT INFORMATION REQUEST FORM LETTER)

Dear

The Development Office has been established by the Department of Cultural Affairs to provide direct access to information regarding the full range of public and private funding available to the cultural community.

Please send information on the following:

CFDA #

Program

Please send us a program packet which includes:

- Funding History
- Guidelines 2.
- Applications Applications 3.
- Deadlines

We would also like to be placed on your permanent mailing list to insure that updated information is available. Please send information to:

> Development Office Department of Cultural Affairs New York, N.Y. 10021 830 Fifth Avenue

Thank you for your time and help.

Sincerely,

Dennis Paul Development Officer

DP:sc

lenry Geldzahler ommissioner

Eleven Points To Effective Lobbying

- Make an appointment to visit your legislator.
- 2 Identify yourself and/or the organization you represent.
- Make sure you inform the legislator that you are a registered voter in his/her district.
- Be prepared. Deal in facts. Leave supporting documents.
- Get your point across in the fewest possible words.
- Don't argue, name call, or threaten.
- Give the legislator a chance to express his/her point of view and be a good listener.
- Don't be afraid to admit ignorance on special points.

 Say you will find the answer and report back.
- Even if turned down, leave on a friendly note since you may want to join forces on another issue or get back later on the original issue in question.
- Give special recognition to the legislators who are known to be on your side, and ask them for advice and help in reaching other legislators.
 - If lobbying with a group, one person should speak on behalf of the group.



Eleven Points To

relaind more tisis at the metalores by a late.

identify yourself and/or the organization you represent.

Make sure you inform the legislator that you are a security to are a security to bis/her district.

Be prepared. Deel in facts, Leave supporting documents.

ell o Get your point across in the fewest possible word

Don't argue, name call, or threaten.

Give the legislator a chance to express his/her point of

Don't be afraid to admit ignorance on special points.
Say you will find the answer and report back.

Even if turned down, leave on a friendly note since you may want to join forces on another issue or get back later on the original issue in operation.

Give special recognition to the legislators who are known to be on your side, and ask them for advice and help in reaching other legislators.

if tobbying with a group, one person should speak on behalf of the group,

Pennis Paul
Pevelopment Officer
Department of Cultural Affairs
City of New York

30 Fifth Avenue lew York, New York 10021 12 360 8125

Funding for Accessibility: Federal, State and Foundation Sources

Council for the Arts in Westchester

February 13, 1980

Handicapped Information Resources

Office of Handicapped Individuals Clearinghouse on the Handicapped 200 Independence Avenue, S.W. 338D, Hubert H. Humphrey Building. Washington, D.C. 20201 (202) 245-1961

A not yet released (1980) <u>Directory of Sources on Handicapped Conditions and Related Services</u>

National Rehabilitation Information Center Catholic University of America 8th & Varnum Streets, N.E. Washington, D.C. 20064

Free computerized data bank search, copy cost 5¢ per page and will be mailed within 72 hours- write for further service description

Dept. of Health, Education and Welfare Office of Human Development Services Office for Handicapped Individuals Washington, D.C. 20201

Resource Guide-Recreation and Leisure for Handicapped Individuals
DHEW #79-22004

Research Grant Guides
P.O. Box 357
Oceanside, New York 11572

Handicapped Funding Directory
(1978), lists over 350 foundations,
governments agencies and associations
which grant funds to institutions and
agencies for programs and services for
Handicapped individuals
\$14.50

Grantsmanship Center News Reprints 1031 S. Grand Avenue Los Angeles, California 90015 January/February 1980 Issues 33 Grantsmanship Resources for Rehabilitation Programs is a collection of materials recommended by experts in the field, for those who plan programs, develop proposals, administer organizations and raise funds \$1.25

Minimum Reprint order \$5.00

National Arts and the Handicapped Information Service Arts and Special Constituencies Project National Endowment for the Arts 2401 E Street, N.W. Washington, D.C. 20506 (202) 634-4284 Answers inquiries on arts and the handicapped, and when necessary, refers requestors to other organizations- write for list of relevant publications

National Committee/Arts for the Handicapped (NCAH)
1701 K Street, N.W.
Suite 801
Washington, D.C. 20006
(202) 223-8007

Mandated to coordinate the national development of arts programs for handicapped children and youth- write for list of relevant publications

National Arts and the Handicapped Information Service Arts and Special Constituencies Project National Endowment for the Arts 2401 E Street, N.W. Washington, D.C. 20506 (202) 634-4284

> National Committee/Arts for the Handicapped (NCAH) 1701 K Street, N.W. Suite 801 Washington, D.C. 20006 (202) 223-8007

@ 5 · 6

Answers inquiries on arts and the handicapped, and when necessary, refers requestors to other organizations- write for list of relevant publications

Mandated to coordinate the national development of arts programs for handicapped children and youth- write for list of relevant publications