

U.S. DEPARTMENT OF EDUCATION

Office of Elementary and Secondary Schools
Full-Service Community Schools Program



**Fiscal Year 2022
FREQUENTLY ASKED QUESTIONS**

**FULL-SERVICE COMMUNITY SCHOOLS
Notice Inviting Applications**

CFDA NUMBER: 84.215J

Revised 8/22/2022

FULL-SERVICE COMMUNITY SCHOOLS CFDA 84.215J
FREQUENTLY ASKED QUESTIONS (Revised 8/22/2022)

Purpose of the FAQs

The purpose of these Frequently Asked Questions (FAQs) is to provide information about the Full-Service Community Schools (FSCS) program. The FAQs do not impose any requirements beyond those included in the FSCS program notice inviting applications (NIA) for new awards for fiscal year 2022 and other applicable laws and regulations. In addition, they do not create or confer any rights for or on any person.

The Department will provide additional or updated program guidance as necessary on its FSCS Web site: <https://oese.ed.gov/offices/office-of-discretionary-grants-support-services/school-choice-improvement-programs/full-service-community-schools-program-fscs/>. If you have further questions that are not answered here, please email FSCS@ed.gov.

Eligible Applicants and Partners

1. What is the definition of a full-service community school?

A Full Service Community School (FSCS) means a public elementary school or secondary school that participates in a community-based effort to coordinate and integrate educational, developmental, family, health, and other comprehensive services through community-based organizations and public and private partnerships; and provides access to such services in school to students, families, and the community, such as access during the school year (including before- and afterschool hours and weekends), as well as during the summer.

2. Who is eligible to apply for a full-service community schools grant?

Eligible applicants under this competition are a consortium of one or more local educational agencies (LEAs); or the Bureau of Indian Education (BIE); and one or more community-based organizations, non-profit organizations, or other public or private entities.

3. Can an individual school be the lead applicant or partner?

Eligible applicants under this program are one or more LEAs; the BIE; or one or more community-based organizations, non-profit organizations, or other public or private entities.

Generally, an individual school does not have independent authority to apply for a grant from the U.S. Department of Education, or make the commitments required of a consortium partner. Consequently, in most cases, public elementary and secondary schools can serve as full-service community school sites, but could not be consortium partners or lead applicants. For that reason, a public elementary or secondary school that lacks the legal authority to apply for a grant on its own, but wants to participate in the FSCS program, would need its LEA to form a consortium and submit an application to the Department.

4. Can a charter school can serve as a lead applicant or consortium partner?

A charter school that operates as an LEA may serve as a lead applicant or a consortium partner in a FSCS application. However, if a charter school is established as a school under the jurisdiction of an LEA, and does not have the authority to apply for a Federal grant, then the LEA, as part of a consortium, could apply and designate the proposed charter school as the site of a full-service community school.

5. Can private schools be part of a FSCS application?

Private schools can serve as partners, but a full-service community school site must be a public elementary or secondary school.

6. Can a consortium applying for FSCS funding include more than one LEA? For example, if a community-based organization (CBO) is countywide and that county has three local education agencies, can the CBO and multiple LEAs apply collectively as a consortium?

Yes. There is no limit to the number of partners that can be part of an FSCS consortium, including LEA partners.

7. Can a State educational agency (SEA) serve as a lead applicant for a FSCS grant under AP5?

An SEA is not eligible to serve as the lead applicant for a FSCS grant, but an SEA can be a partner under any FSCS application. Applications submitted under Absolute Priority (AP) 5 in the [FY 2022 Notice Inviting Applications](#) (NIA) must include a description of the SEA's commitment to and partnership in the consortium.

8. Can a current FSCS grantee apply for a grant under Absolute Priority 4 or 5 before completing their current grant? Can grantee staff support the development of the application?

There is no need to have completed your existing FSCS grant before submitting an application to scale up current work to multiple LEAs or the State level. However, current FSCS grantees are encouraged to consider readiness to scale and staff capacity to complete the existing grant and start a new one at the same time. In addition, the activities under the existing and proposed new grant should be distinct as grantees are prohibited from paying for the same cost under two grants.

A grantee cannot use funds under its current grant to pay an employee or contractor to prepare an application for a FSCS grant or for any other Department of Education grant.

9. Are institutions of higher education (IHEs) eligible to apply for a FSCS grant?

Yes, an IHE that is also a community-based organization, nonprofit organization, or other public or private entity is eligible to apply for a FSCS grant as a lead applicant when partnering with one or more LEAs or the BIE.

10. Can a single entity submit more than one application as the lead applicant?

Yes. However, the Department will not fund applications that are carrying out duplicate or overlapping activities. In other words, the Department will not pay for the same activity twice, even if the activity is included in two separate grant applications. For that reason, if a non-profit entity, or any other eligible entity, is part of more than one application, it should be sure that the activities proposed in the various applications they are part of do not duplicate one another.

11. Can an LEA be part of more than one consortium, and thus be part of multiple application submittals?

Yes. However, the Department will not fund applications that are carrying out duplicate or overlapping activities. In other words, the Department will not pay for the same activity twice, even if the activity is included in two separate grant applications. For that reason, if a non-profit entity, or any other eligible entity, is part of more than one application, it should be sure that the activities proposed in the various applications they are part of do not duplicate one another.

12. Under AP4 Multi-LEA Grants, can the LEAs be located in different states?

Under AP3, as applicable, or AP4, the NIA does not require that the LEAs be located in the same State. The Department acknowledges that community identity often transcends official State boundaries and that, in some places, including rural and Tribal areas, it may be appropriate for the two or more LEAs to be located in Different States.

13. What entity may act as the fiscal agent for an FSCS grant?

The Department will award an FSCS grant to the lead applicant, which then becomes the grantee. Under all Department grant programs, the grantee is the fiscal agent. A grantee may rely on a third party to perform fiscal management functions related to its FSCS grant. The grantee, however, remains the fiscal agent for the grant and, as such, is responsible for ensuring that grant funds are used for allowable and documented costs.

Eligible applicants under this competition are a consortium of one or more LEAs; or the BIE; and one or more community-based organizations, non-profit organizations, or other public or private entities.

14. If an applicant did not notify the Department of its intent to apply, is the applicant still eligible to apply for an FSCS grant?

Yes. Submitting an intent to apply is not mandatory. Applicants may submit an application for an FSCS grant regardless of whether or not they notified the Department in advance of their intent to apply.

15. Can a charter management organization apply as the lead applicant for a FSCS grant?

Any entity that meets the eligibility requirements – that is to say is an LEA or is a community-based organization, a nonprofit organization, or other public or private entity – may serve as the lead applicant for a FSCS grant.

16. Does FSCS have a poverty level requirement for eligibility?

The program requires, under absolute priorities one and two, that the applicant propose to serve two or more schools eligible for a Title IA schoolwide program. As defined in the notice inviting applications (NIA), schools eligible for a schoolwide program means any school eligible under 34 CFR 200.25(b) to operate a schoolwide program.

Generally, a school is eligible for a schoolwide program if 40% or more of the school's students are from low-income families or 40% or more of the families in the attendance area of the school are low-income. The local educational agency (LEA), or school district, is best positioned to confirm if a school is eligible for a schoolwide program.

17. Are the Outlying Areas (American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, the U.S. Virgin Islands, the Marshall Islands, the Federated States of Micronesia, and Palau) eligible applicants under the FSCS program?

All these entities, except for Palau, are eligible applicants under absolute priority (AP) 3 Capacity Building and Development Grants and AP 5 FSCS State Scaling Grants. If an

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Outlying Area has two or more local educational agencies (LEAs), that Outlying Area would also be eligible to apply under AP4 Multi-Lea Grants.

Absolute Priorities

1. What are the fiscal year (FY) 2022 FSCS absolute priorities?

The FY 2022 FSCS NIA includes five absolute priorities. The Department will consider only applications that meet Absolute Priority 1 or Absolute Priority 2 and one additional absolute priority (Absolute Priority 3, Absolute Priority 4, or Absolute Priority 5). These priorities are:

- **Absolute Priority 1--Title IA Schoolwide Program Eligibility:** *To meet this priority, applicants must propose to serve a minimum of two or more full-service community schools eligible for a schoolwide program (as defined in the NIA) under section 1114(b) of the ESEA, as part of a community- or district-wide strategy.*
- **Absolute Priority 2 – Title IA Schoolwide Program Eligibility and Rural Districts--Small and Rural or Rural and Low-Income:** *To meet this priority, applicants must propose to serve: (1) a minimum of two or more full-service community schools eligible for a schoolwide program under section 1114(b) of the ESEA, as part of a community- or district-wide strategy; **and**, (2) eligible entities that include an LEA that satisfies the requirements of the Small Rural School Achievement (SRSA) program (ESEA section 5211(b)(1)(A), (B), or (C)) or the Rural and Low-Income School (RLIS) program (ESEA section 5221(b)(1)(A), (B), or (C)).*
- **Absolute Priority 3--Capacity Building and Development Grants:** *To meet this priority, applicants must propose projects to (a) conduct initial development and coordination activities, including extensive community engagement, that leverage the findings of their needs assessment--which may be completed during or before the grant period--to develop the infrastructure, activities, and partnerships to implement full-service community schools in two or more schools, and (b) gather data on performance indicators.*
- **Absolute Priority 4--Multi-Local Educational Agency Grants:** *To meet this priority, applicants must propose projects to implement and sustain full-service community schools in two or more LEAs. As outlined in Section 4622(1)(B) of the ESEA, an eligible entity for any FSCS grant is a consortium of one or more LEAs or the Bureau of Indian Education (BIE) and one or more community-based organizations, nonprofit organizations, or other public or private entities. The project must, with the exception of LEAs that oversee a single school, coordinate and provide services at two or more full-service community schools in each LEA.*
- **Absolute Priority 5--FSCS State Scaling Grants:** *Applications submitted under Priority 5 must include a written commitment of the SEA to participate in the partnership and to sustain the program beyond 2 years after the term of the grant, which can be submitted in the required preliminary memorandum of understanding (MOU) that includes the roles and responsibilities of the SEA and other partners identified at the time of the application. The applicant, in partnership with the SEA, determines the number and percentage of State LEAs, and the number and percentage of schools across those LEAs, that will develop,*

support, and expand full-service community schools over the 5-year grant performance period.

Applications under Priority 5 must also identify or establish a state steering committee (which may be a previously existing body) that represents relevant community schools' stakeholders, including educators and other school staff, community school initiative leaders, education union or association designees, family leaders participating in community school programs, community partners such as service providers, early childhood education providers such as Head Start, and community school coordinators from schools already implementing full-service community schools in the State. In addition to serving as an advisory committee, the state steering committee also has the authority to make decisions about the design, implementation, and evaluation for the grant, which may include identification or selection of LEAs that will partner in the development and implementation of two or more community schools in each LEA, with the exception of LEAs that oversee a single school. The roles and responsibilities of the state steering committee must be included in the required preliminary MOU.

2. How many absolute priorities (APs) does an applicant need to address?

An applicant must address AP 1 or AP2 and one additional absolute priority (AP 3, AP4, or AP5).

3. What is the difference between AP 1 and AP2?

Under AP1, an applicant must propose to serve at least two full-service community schools that are eligible for a schoolwide program under section 1114(b) of the ESEA, as part of a community-wide or district-wide strategy.

*Under AP2, applicants must (1) must propose to serve at least two full-service community schools that are eligible for a schoolwide program under section 1114(b) of the ESEA, as part of a community-wide or district-wide strategy; and, (2) meet the requirements of AP1 **and** include at least one LEA that that satisfies the requirements of the Small Rural School Achievement (SRSA) program or the Rural and Low-Income School (RLIS) program.*

4. How do I find out if an LEA is eligible under the Rural School Achievement (SRSA) program or the Rural Low-Income Schools (RLIS) program?

Applicants may determine whether a particular LEA is eligible for these programs by referring to information on the following Department website:

<https://oese.ed.gov/offices/office-of-formula-grants/rural-insular-native-achievement-programs/rural-education-achievement-program/>.

5. Can an applicant apply under multiple absolute priorities?

Yes. If an entity is interested in proposing separate projects (e.g., one that addresses Absolute Priority 3 and another that addresses Absolute Priority 4), separate applications must be submitted.

6. Will the Department make awards under all of the absolute priorities?

Absolute Priorities 3, 4, and 5 constitute their own funding categories under Absolute Priority 1 and under Absolute Priority 2. Consequently, there will be separate funding slates for each of the following categories of applications:

- *Absolute Priorities 1 and 3;*
- *Absolute Priorities 1 and 4;*
- *Absolute Priorities 1 and 5;*
- *Absolute Priorities 2 and 3;*
- *Absolute Priorities 2 and 4; and*
- *Absolute Priorities 2 and 5.*

The Secretary intends to award grants under each of these funding categories, provided that applications of sufficient quality are submitted.

7. If we are NOT applying under Absolute Priority (AP) 3, may we still plan to conduct a needs assessment during the first year of the grant using grant funds, or must any formal needs assessment be conducted before funds are awarded?

Under AP4 and AP5, applicants must include in their application a needs assessment that identifies the academic, physical, nonacademic, health, mental health, and other needs of students, families and community residents for schools identified for services. A plan to conduct a needs assessment during the first year would not be sufficient.

8. If an AP4 Multi-LEA or AP5 FSCS State Scaling applicant will serve rural and non-rural LEAs, should it apply under AP1 or AP2?

The Absolute Priority 2 requirement is that, in addition to serving at least two full-service community schools that are eligible for a schoolwide program under section 1114(b) of ESEA, at least one LEA meets the requirements under the Small Rural Student Achievement program or the Rural and Low-Income School Program.

Under AP4, if an applicant meets the criteria for applying under AP1 and AP4 and also meets the criteria for AP2 and AP4, the applicant can decide the priority under which they want to apply. This also applies to applicants submitting under AP5.

Q: Can a school that is eligible for a schoolwide program but not implementing one count toward the two schools required in absolute priorities 1 and 2? Can a school that received a State waiver to provide services schoolwide count toward the two schools required in absolute priorities 1 and 2 requirements?

A school that is Title IA schoolwide eligible – even if it is not receiving programming – can be used to meet the absolute priority 1 or 2 requirements. A school that has received a State waiver to implement a schoolwide program under 1114(b) of the ESEA can also be used to meet the absolute priority 1 or 2 requirements.

A school that is not eligible or that has not received a waiver that allows it to implement a schoolwide program would not be sufficient to meet the requirement to serve two schoolwide eligible schools; however, it could be served in addition to the two required schools eligible for a schoolwide program under 1114(b) of the ESEA.

Preliminary Memorandum of Understanding

1. Do applicants have to submit a preliminary memorandum of understanding (MOU) for each partner or can it be a single preliminary MOU that includes all the partners?

Although there must be a preliminary MOU between the applicant and all partners, there is no standard format for the preliminary MOU. We strongly encourage applicants, however, to submit a single comprehensive preliminary MOU that outlines the roles and responsibilities of all partners.

2. Can partners and/or MOUs be changed post-award?

The FSCS program requires grantees to submit a final MOU among all partners at the end of the first year of the grant. While it is possible to change partners and update the MOU post-award, such changes can only be made if they will not alter the scope and objectives of the project as described in the approved applications. Because projects are selected for funding on the basis of their applications, it would undermine the integrity of the competitive review process if changes that alter the scope and objectives of a project were permitted after a grant award has been made. While planning can take place during the first year of an FSCS grant, the planning cannot result in changes to the scope and objectives of the project. Since applicants were evaluated by the readers based on the capacity and other attributes of the members of the consortium originally proposed, changes in consortium membership can only be done if the scope and objectives of the project are not altered as a result.

3. Under Priority 5, does the MOU have to include the commitment of all schools the FSCS grant would extend to (i.e. the percentage/number of schools the SEA /LEA and lead applicant have agreed to expand to) or would some of the schools be able to be later determined as part of the planning process in year 1? At least one LEA has to be included in the application to be eligible, but if the SEA and applicant had agreed to scale to a certain percentage of schools and LEAs across the state that some of those schools/LEAs could be decided later as part of the year 1 planning process?

A FSCS applicant must include at least one LEA partner in its consortium in order to be an eligible entity. Under absolute priority (AP) 5, the applications must include a description of the State steering committee, which has the authority to make decisions about the design, implementation, and evaluation for the grant, which may include identification or selection of LEAs that will partner in the development and implementation of two or more community schools in each LEA. AP5 applications may address the process or criteria that the applicant and the State steering committee will use to select partner LEAs; they are not required to identify all LEAs that will participate in the grant.

4. If an applicant is working with 2 LEAs, must the applicant implement an overarching collaborative leadership structure that includes both LEAs or may it maintain separate leadership councils for each LEA?

The FY 2022 NIA requires that an application include a description of the pillars of full-service community schools that it will have in place or how it will establish these pillars, or, if working with partners, how it will implement these pillars with partners, including community-based organizations and collaborating with school leadership and staff. The four pillars of full-service community schools – integrated student supports, expanded and enriched learning time and opportunities, active and community engagement, and collaborative leadership and practices – should be implemented at each full-service community school.

At the project level, applications must include a preliminary MOU among all partner entities of the eligible entity, identified at the time of the application, that will assist the eligible entity to plan, develop, coordinate, provide and evaluate pipeline services and that describes the roles and responsibilities that the partners, including the broadly representative consortium, will assume. If awarded, grantees must submit a final MOU at the end of the first year of the grant.

**Q: What is the leadership structure that needs to be in place at the school level?
What leadership structure needs to be in place at the grant or project level?**

The pillars of community schools, which include “collaborative leadership and practices” and a “school-based leadership team,” are to be developed and implemented at the school level. The MOU requirements speak to the leadership at the project level, which include the “broadly representative consortium.” For AP5 State Scaling Grants, there is also a project level requirement for the State educational agency to be a partner and to have or develop a State steering committee.

Budget

1. Are costs associated with summer program components or evening and weekends allowable?

Yes. Project services can be delivered before, during, and after regular school hours, as well as during the summer and holiday breaks.

2. Can services occur outside the school building?

Yes. Services can be provided at the school site, off the school site or a combination of both. However, it is important to note that the intent of a full-service community school is to serve as a conduit for coordinating and/or providing services. Although supporting schools is an underlying premise of the FSCS program, and schools will likely be the location of many services and opportunities, learning occurs in many settings within a community, not just school buildings. The specific location of the services, while important, is not as critical as the delivery of the services in a well-coordinated, results-focused and integrated manner.

3. Can grant funds be used to pay various types of specialized personnel, such as health care professionals, probation officers, and others?

Grant funds may be used to pay such personnel if those personnel are providing services that were related to carrying out an allowable activity, and those personnel are not being compensated for providing this service by their primary employer. Grant funds may only be used to compensate such staff for the amount of time that they are providing services necessary to the implementation of grant activities.

4. Can funds be used to purchase equipment?

Yes. Funds may be used to purchase equipment, provided the costs are reasonable and necessary to carrying out the project's scope of work.

5. Can grant funds be used for construction or renovations?

FSCS grants cannot be used to pay for construction or the acquisition of real property. For additional information on this topic, see 34 CFR 75.533 of EDGAR, which can be viewed at [eCFR :: 34 CFR 75.533 -- Acquisition of real property; construction](#).

However, funds can be used to do renovations to space where pipeline services are provided. Any project that dedicated FSCS funding to renovating a space would need to meet all the other requirements that apply to a FSCS grant, and the cost of the renovations would need to fit within the scope of the FSCS program and also be reasonable and necessary to accomplishing the purpose of the proposed project.

6. Can funds be used to support expanding services at current community schools (while of course adhering to the supplement not supplant rule)?

Yes, applicants may propose to use grant funds to expand services at a current community school provided they follow the supplement funding requirements outlined in the NIA. Grantees must use FSCS grant funds to supplement, and not supplant, any other Federal, State and local funds that would otherwise have been available to carry out

activities authorized under section 4625 of the ESEA. In addition, the activities under the existing and proposed new grant should be distinct as grantees are prohibited from paying for the same cost under two grants.

7. Must we ask for the same amount of money for each year or can it change from one year to the next?

Under AP 3, an applicant can request up to \$2.5 million over the five-year grant period. Under AP 4, an applicant can request up to \$15 million over the five-year grant period. Under AP 5, an applicant can request up to \$50 million over the five-year grant period. The applicant should specify the amount of funding needed for each of the five years. The amount of money requested per year can vary, depending on the costs associated with the work proposed in a given year, but will not be funded for an amount that exceeds the maximum award amount for each priority for the entire project period.

8. What is the Department's definition of planning and what types of planning activities are allowable during the first year of the grant?

The Department has not specifically defined planning and encourages applicants to define planning in the context of their proposals. Interagency collaborative efforts are highly complex undertakings and, as such, require extensive planning and communication among partners and key stakeholders. Therefore, applicants may devote up to 10 percent of the total amount of grant funds for planning purposes during the first year of the grant.

9. How much money can a FSCS grantee use for planning?

FSCS grantees may use up to 10 percent of the total amount of grant funds for planning purposes during the first year of the grant. For example, an AP5 applicant that requests \$50 million over the five-year grant period may use up to \$5 million for planning in year one.

10. When is the funding likely to start in terms of planning budget cycles for each year of the grant?

Notification of funding will occur by December 30, 2022, and the award start date will be January 1, 2023. If the Department is able to make awards earlier, we will make every effort to do so. Continuation funding in subsequent years will be based on the year 1 budget start and end dates.

11. When preparing the budget and detailed budget narrative, should the applicant break out costs for each of the partners for each budget year?

Yes. The ED SF-524 (budget information worksheets contained in the application package) should show a summary budget for the project, for each year and each of the budget categories. The budget narrative should break out those costs for the lead applicant and each of the partners for each year of the project.

12. Should applicants show break out costs for Federal grant funds as well as non-Federal contributions?

Yes. Applicants are required to complete ED SF-524 Section A Budget Summary (U.S. Department of Education Funds) to show a break out of U.S. Department of Education Federal grant funds as well as ED SF-524 Section B Budget Summary (Non-federal Funds) to show matching funds or other non-Federal resources to the project.

13. Should we include money in our budget for a project director's meeting in Washington, DC?

Yes. Applicants should budget for four project staff persons (project director, evaluator, and two partners) to attend an annual project directors meeting in Washington, DC for each year of the project period.

14. Is there a minimum amount of funds that an eligible applicant must request in its application for an FSCS grant?

Yes. Under ESEA section 4625(d), the Secretary is prohibited from making a grant under the Full-Service Community Schools program in an amount that is less than \$75,000 for each year of the grant. Therefore, we will reject any application that proposes an amount that is less than \$75,000 for any budget period.

15. Is there a requirement for matching?

Yes, each FSCS grantee shall provide matching funds from non-Federal sources, which may be provided in part with in-kind contributions. The BIE may meet the matching requirement using funds from other Federal sources. A FSCS applicant must propose the amount of cash or in-kind resources to be contributed for each year of the grant. Applicants should demonstrate the match commitment in the required preliminary MOU or by including letters in their applications explaining the type and quantity of the match commitment.

16. Is there a non-supplanting requirement?

The FSCS program is subject to supplement-not supplant funding requirements. Grantees must use FSCS grant funds to supplement, and not supplant, any other Federal, State, and local funds that would otherwise have been available to carry out activities authorized under section 4625 of the ESEA. Any cost, in order to be allowable, must meet this requirement.

17. If we have consortium partners that indicate that they're going to provide in-kind services, can we eliminate them from the budget altogether and just include that in the memorandum of understanding?

If consortium partners will be providing in-kind services vital to the successful execution of the proposed scope of work, information about these services should be provided in the budget so that reviewers can thoroughly evaluate the adequacy of resources. A grantee will be held accountable for any in-kind or other contributions by the lead applicant or a consortium partner that are necessary to the project achieving its scope of work and objectives.

18. Can we charge indirect costs to the grant?

Yes. Indirect costs can be charged to the grant using a federally approved indirect cost rate. Because this program is subject to a statutory non-supplanting requirement, grantees are limited to claiming costs under a restricted indirect cost rate. 34 C.F.R. 75.563.

19. What is the level of required match?

Section 4623(d) of the ESEA requires that FSCS grantees provide matching funds from non-Federal sources, which may be provided in part with in-kind contributions. The Department has not set a required level of match. Please note that the Bureau of Indian Education may meet the matching requirement using funds from other Federal sources.

20. Can funds from another existing grant be counted toward the matching funds requirement?

Section 4623(d) of the ESEA requires that FSCS grantees provide matching funds from non-Federal sources, which may be provided in part with in-kind contributions. With the exception of Bureau of Indian Education applicants, only non-Federal resources will be counted toward the matching funds or cost share requirement.

21. How does a grantee under the FSCS program obtain a restricted indirect cost rate?

Programs, like FSCS, that contain a supplement-not-supplant requirement are required to use a restricted indirect cost rate under 34 CFR §§ [75.563](#) and [76.564-76.569](#). Once awarded, grantees must notify the cognizant agency that the grant is subject to a restricted indirect cost rate, as calculated under 34 CFR §§ [75.563](#) and [76.564-76.569](#) and negotiate a restricted indirect cost rate with the U.S. Department of Education – Indirect Cost Division. To accomplish this, the grantee should ask its cognizant agency to contact the Department’s Indirect Cost Division to coordinate a review of the restricted indirect cost proposal. Alternatively, an entity that is not a State or local government under a program that contains supplement-not-supplant provisions may elect to utilize a restricted indirect cost rate of 8% modified total direct costs (MTDC) if their negotiated restricted indirect cost rate calculated under 34 CFR [75.563](#) and [76.564-76.569](#), is not less than 8% modified total direct costs. For more information regarding indirect costs, or to obtain a negotiated indirect cost rate, please see www2.ed.gov/about/offices/list/ocfo/intro.html or contact IndirectCostDivision@ed.gov.

22. What are the annual budget periods for the FY 2022 FSCS grants?

The annual budget and performance periods will be January 1 to December 31 for every year of the grant period, which is up to five years.

23. Can FSCS grant funds be used to provide family members with a stipend for their attendance at monthly consortium meetings?

The allowability of using FSCS funds to provide stipends to family members for participation in meetings or events would depend upon the specific circumstances described in the application and would have to be reasonable and necessary to the success of the project, as demonstrated in the project and budget narratives. Participant

support costs are also subject to prior approval, i.e., they must be approved by the Department prior to use of funds for that purpose. If an applicant describes those costs in the application, the Department will, in reviewing the application, determine if the use of funds for this purpose is appropriate.

24. The FSCS Application Instructions state that an applicant must provide a brief statement that it has followed the procedures for procurement under 2 CFR 200.317-200.326. Are subcontracts with agencies providing services (for example, agencies that will hire and manage FSCS Coordinators, or agencies providing mental health or other services within the schools to be served) subject to these procurement procedures, for example competitive bidding?

The procurement requirements in the Uniform Guidance apply, but not all procurements have to follow full competitive bidding procedures. For example, contracts that are at or below the small acquisition threshold, \$250,000, can use small purchase procedures. Micro-purchases, \$10,000 or less, do not have to go through a procurement process. There are circumstances under which the Uniform Guidance allows for non-competitive procurements. Here is a link to the procurement requirements set out in 2 CFR Part 200: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR45ddd4419ad436d>.

In addition, under 34 CF 75.135, there are additional provisions that allow for exceptions to competition requirements for grant partners and vendors that are identified in an application: <https://www.ecfr.gov/current/title-34/subtitle-A/part-75/subpart-C/subject-group-ECFRf99f48971e99c29/section-75.135>.

25. Our budget includes several partners that will be providing direct services through subcontracts. Can those organizations charge indirect costs?

As set out in the NIA, subgrants are not authorized for grants awarded under this competition. As a result, FSCS grantees would need to enter into procurement arrangements with partners that are providing grant-related services. A grantee's contractor is not entitled to indirect costs, but can receive reasonable compensation for overhead costs. The grantee, as part of the procurement process, can negotiate these costs with their contractors.

Q: What is the difference between sub-granting and contracting?

As outlined in [75.708](#), FSCS does not allow funds to be used for sub-granting, which is the use of grant funds to hold a competition that provides subgrants to eligible entities. One example of sub-granting is the use of formula 21st Century Community Learning Centers to provide competitive subgrants to LEAs and nonprofits to provide afterschool programming.

FSCS does allow grantees to enter into contractual agreements with service providers to meet the scope of work outlined in the application. As noted in Budget FAQ 24, the procurement requirements in the Uniform Guidance apply, but not all procurements have to follow full competitive bidding procedures. For example, contracts that are at or below the small acquisition threshold, \$250,000, can use small purchase procedures.

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FREQUENTLY ASKED QUESTIONS (Revised 8/22/2022)

Micro-purchases, \$10,000 or less, do not have to go through a procurement process. There are circumstances under which the Uniform Guidance allows for non-competitive procurements. Here is a link to the procurement requirements set out in 2 CFR Part 200: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR45ddd4419ad436d>.

In addition, under 34 CF 75.135, there are additional provisions that allow for exceptions to competition requirements for grant partners and vendors that are identified in an application: <https://www.ecfr.gov/current/title-34/subtitle-A/part-75/subpart-C/subject-group-ECFRf99f48971e99c29/section-75.135>

Project Design

1. Can FSCS funds be used to continue a project that was established using funds from another grant or are funds only for new FSCS school sites?

FSCS funds can be used to establish a new or expand an existing full-service community school. As long as monies from other funding sources are not commingled with FSCS grant funds, FSCS grant funds can be used to leverage those other funding sources to support the FSCS project.

2. Is there a minimum number of students that a FSCS grantee must serve?

No, there is no minimum number of students that a FSCS grantee must serve. An applicant is free to propose how many students it will serve under its project, consistent with its project goals, capacity, and resources.

Given that all FSCS grantees are required to report on the performance measure regarding the increase in the number and percentage of families and students targeted for services each year of the program, applicants should propose scaling targets that represent reasonable costs per student for the grant. Applicants can specify in their application narrative considerations such as intensity of services (for example, projects proposed to serve students with severe disabilities that rely on one-on-one services or high-cost auxiliary supports).

3. Can grant funds be used to deliver services or coordinate services?

FSCS grant funds can be used to deliver services, coordinate services, or a combination of both.

4. What is the Department's definition of need in the context of FSCS?

The Department has not provided a definition of need in the context of the FSCS program. While the NIA does not specifically include a definition of need, applicants are required to include a needs assessment that identifies the academic, physical, nonacademic, health, mental health, and other needs of students, families and community residents. project Note: AP3 applicants are required to submit a plan for conducting the needs assessment that identifies the academic, physical, nonacademic, health, mental health, and other needs of students, families and community residents. .

5. Must each proposed full-service community school have a full-time full-service community school coordinator?

Yes. The full-service community school coordinator must be employed full-time in that position at the full-service community school. The full-service community school coordinator should work closely with school leadership and community stakeholders to plan, integrate, coordinate, and facilitate the delivery of pipeline services at the school. The full-time full-service community school coordinator may also lead the school and community assessment of needs and assets and identify ways to sustain the services and partnerships beyond the grant.

6. Can grant funds be used to support expanding services at current community schools (while of course adhering to the supplement not supplant rule)?

Yes, applicants may propose to use grant funds to expand services at a current community school provided they follow the supplement funding requirements outlined in the NIA. Grantees must use FSCS grant funds to supplement, and not supplant, any other Federal, State and local funds that would otherwise have been available to carry out activities authorized under section 4625 of the ESEA. In addition, the activities under the existing and proposed new grant should be distinct as grantees are prohibited from paying for the same cost under two grants.

7. For applications submitted under Absolute Priorities (AP) 3, 4, or 5, are applicants required to establish new community schools or can services and activities be expanded in existing community schools? *Applications submitted under AP 3 must propose projects to (a) conduct initial development and coordination activities, including extensive community engagement, that leverage the findings of their needs assessment—which may be completed during or before the grant period—to develop the infrastructure, activities, and partnerships to implement full-service community schools in two or more schools, and (b) gather data on performance indicators. In addition to the two required schools. AP3 applicants may propose to expand services in additional schools. Please note that the funding limit under AP3 applications is \$500,000 per year for five years for a total of up to \$2.5 million.*

For applications submitted under AP4, applicants must propose to implement and sustain full-service community schools in two or more LEAs. The project must coordinate and provide services at two or more schools in each local educational agency (LEA), unless the LEA oversees a single school. Services may include the expansion of existing community schools.

For applications submitted under AP5, applicants must, in partnership with the state educational agency (SEA), determine the number and percentage of State LEAs that will develop, support, and expand full-service community schools over the grant period. AP5 Applicants and their partnering SEAs must also establish or work with an existing state steering committee, which has the authority to make decisions about design, implementation, and evaluation for the grant, which may include selection of LEAs.

8. Under AP5, can an SEA use FSCS funds to build their own capacity to provide technical assistance (TA) to LEAs and schools in their State? Could funds be used to develop a State Community Schools TA Center?

While an SEA cannot be the applicant for a FSCS grant, they are a required partner under AP5 and can be a partner under AP3 or 4. As a partner, the SEA could be engaged to carry out grant related activities.

The allowability of a cost like a TA Center under a grant is always dependent on the details of the proposal. To the extent the TA Center is, within the context of a particular application, a reasonable and necessary way of carry out that project, it would be allowable.

Q: How does the Department define “full time” for the requirement that the full-service community school coordinator be a full-time position?

We have not defined “full time.” We would rely on the definition used by the grantee organization, provided it is reasonable. For schools, the position would be categorized under the full-time, non-academic personnel similar to school counselors and administrators, meaning it is a year-round position (no summer vacations).

Services

1. What are the Department’s definitions of the pipeline services under FSCS?

The Department provided definitions of the eight pipeline services under the definitions section of the Notice. These definitions come from section 4622(3) of the ESEA.

Pipeline services means a continuum of coordinated supports, services, and opportunities for children from birth through entry into and success in postsecondary education and career attainment. Such services shall include, at a minimum, strategies to address through services or programs (including integrated student supports) the following:

- (a) High-quality early childhood education programs.*
- (b) High-quality school and out-of-school-time programs and strategies.*
- (c) Support for a child’s transition to elementary school, from elementary school to middle school, from middle school to high school, and from high school into and through postsecondary education and into the workforce, including any comprehensive readiness assessment determined necessary.*
- (d) Family and community engagement and supports, which may include engaging or supporting families at school or at home.*
- (e) Activities that support postsecondary and workforce readiness, which may include job training, internship opportunities, and career counseling.*
- (f) Community-based support for students who have attended the schools in the area served by the pipeline, or students who are members of the community, facilitating their continued connection to the community and success in postsecondary education and the workforce.*
- (g) Social, health, nutrition, and mental health services and supports.*
- (h) Juvenile crime prevention and rehabilitation programs.*

2. Must services be delivered only during regular school hours?

No. Services can be provided before, during, or after regular school hours, as well as on weekends, holidays, and during the summer.

3. Can FSCS grant funds be used to pay for physical education?

No. We consider physical education to be a component of the in-school curriculum, and as such, should not be supported using FSCS grant funds. Physical activities, however, are allowable if carried out in association with nutrition services or with mentoring and youth development services.

4. Is the provision of corrective eyewear an allowable use of FSCS funds?

Yes. Vision screening and vision care, including the provision of corrective eyewear, are allowable activities under the primary health care and dental care service category.

5. What types of mental health services can be provided using FSCS grant funds?

Mental health services encompass a broad range of school- and community-based services, including but not limited to clinical mental health services. The type of mental health interventions may vary and should be based on the needs of the service recipient.

Applicants may define the appropriate type of mental health interventions needed to meet the needs of their target population.

6. If we are applying on behalf of a consortium that includes 2 LEAs, must the same services be coordinated across both LEAs by the same partners, or may we engage different partners within each of the LEAs based on their unique needs?

AP4 and AP5 applicants are required to include a comprehensive plan that describes, among other things, the pipeline services, including existing and additional pipeline services, to be coordinated and provided by the eligible entity and its partner entities, including an explanation of why such services have been selected, how services will improve student achievement, and how such services will address the annual performance objectives and outcomes. The services provided at each full-service community school should be designed in response to the needs and assets of that school.

7. Are applicants required to address and provide services across the full pipeline, i.e., early childhood education programs through activities that support postsecondary and workforce readiness?

The required needs assessment, or plan for conducting the needs assessment under AP3, identifies the academic, physical, nonacademic, health, mental health, and other needs of students, families, and community residents. The comprehensive plan must describe the pipeline services and include an explanation of (i) why such services have been selected; (ii) how such services will improve student academic achievement; and (iii) how such services will address the annual performance objectives and outcomes.

Grantees are required to use grant funds to coordinate three or more existing pipeline services and provide at least two more pipeline services at two or more public elementary or secondary schools; to the extent practicable, integrate multiple pipeline services at two or more public elementary or secondary schools under AP3 and in each LEA under AP 4 and AP5; and if applicable, coordinate and integrate services provided by community-based organizations and government agencies with services provided by services provided by specialized instructional support personnel.

Evaluation

1. For the requirement that a grantee must conduct an independent evaluation of its project, does the Department define “independent?”

No, the Department does not provide a definition for “independent evaluation.”

However, an applicant might want to consider, in meeting this program requirement, an evaluation that is designed and carried out independent of, but in coordination with, any employees of the partners who are providing services.

2. How much money should be allocated for evaluation?

There is no minimum designation on the amount of funds to be allocated for evaluation activities. Applicants should allocate funds commensurate with the resources required to effectively implement their evaluation plan.

3. Are applicants required to include baseline data for the FSCS indicators?

No, applicants are not required to include baseline data for the required FSCS indicators. The independent evaluation is required to include annual evaluations of progress achieved, be used to refine and improve activities, collect and report data on the required indicators, and make results of the evaluation publicly available.

Q: FSCS requires that a grantee have an independent evaluator. Does the application need to include the evaluation plan or is it sufficient for the applicant to say that it is committed to hiring an independent evaluator?

As outlined in the Notice Inviting Applications, Application Requirement G states that an applicant must commit to an independent evaluation that includes a design and implementation evaluation that includes (1) annual evaluations of progress achieved, (2) be used to refine and improve activities, (3) collect and report data on the required indicators, and (4) make results publicly available.

*Applicants are not required to consult with or hire an independent evaluator during the development of their application, but their applications will be rated against selection criteria that assesses the extent to which the project reflects relevant and evidence-based findings from existing literature and includes a high-quality plan for project implementation integrating the four pillars for community schools and the use of appropriate evaluation methods to ensure successful achievement of project objectives, as well as three criteria under *Quality of Project Evaluation*.*

Application Instructions, Forms, and Attachments

Q: How does an applicant meet Application Requirement 5 to provide an assurance that the eligible entity and its partner entities will focus services on schools eligible for a schoolwide program under section 1114(b)?

Applicants can meet the application requirement by including a statement in Attachment C of the application. There is no form to complete.

Q: Under the ED Supplemental Information for SF-424, how does FSCS define “new potential grantee” or “novice applicant”?

The FSCS FY 2022 notice inviting applications did not define new potential grantee or novice applicant, and FSCS does not provide any additional points for new grantees or novice applications.

When deciding how to complete the form, please use the definition for novice applicant from the Instructions for the ED Supplemental Information for SF-424, which states:

Novice Applicant: For discretionary grant programs, novice applicant means any applicant for a grant from ED that—

- Has never received a grant or subgrant under the program from which it seeks funding;*
- Has never been a member of a group application, submitted in accordance with 34 CFR 75.127-75.129, that received a grant under the program from which it seeks funding; and*
- Has not had an active discretionary grant from the Federal government in the five years before the deadline date for applications under the program.*

For the purposes of this requirement, a grant is active until the end of the grant’s project or funding period, including any extensions of those periods that extend the grantee’s authority to obligate funds. In the case of a group application submitted in accordance with 34 CFR 75.127-75.129, a group includes only parties that meet the requirements listed above.

The Novice Applicant priority is from 34 CFR 75.225, and it must be included in the program competition NIA to be claimed on the form.