

UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

Office of Migrant Education

Fiscal Year (FY) 2024 High School Equivalency Program (HEP) and College Assistance Migrant Program (CAMP) Pre-Application Webinar Questions and Answers

Budget Information:

1. Should applicants only write the first-year budget request amount in the SF 424?

Answer: For number 18 in the SF 424, please enter the amount requested, or to be contributed during the first funding/budget period by each contributor. Value of in-kind contributions should be included on appropriate lines, as applicable.

When completing the ED 524 Form, please see Q9 in the FY 2024 HEP and CAMP Application Frequently Asked Questions (FAQs). In applying for a grant, an applicant shall submit a grant application that:

"(1) Covers a period of five years unless extraordinary circumstances warrant a shorter period; and (2) Includes an annual budget of not less than \$180,000."

More information can be found in the FY 2024 HEP and CAMP Application FAQs: <u>https://oese.ed.gov/files/2023/11/FY-2024-HEP-and-CAMP-Application-FAQs-Final-11.14.23.pdf</u>

2. Can you please clarify how \$180,000 over 5 years equals \$900,000 but the Notice Inviting Applications (NIA) states applicants can ask for \$475,000 for 5 years?

Answer: Please see Q9 from the FY 2024 HEP and CAMP Application FAQs:

"Applicants shall submit a grant application that: (1) Covers a period of five years unless extraordinary circumstances warrant a shorter period; and (2) Includes an annual budget of not less than \$180,000."

Please see information below taken from the FY 2024 HEP and CAMP NIAs:

"Maximum Award: We will not make an award exceeding \$475,000 for a single budget period of 12 months. Under 34 Code of Federal Regulations (C.F.R.) § 75.104(b) the

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

Secretary may reject, without consideration, or evaluation any application that proposes a project funding level that exceeds the stated maximum award amount.

Minimum Award: The Department will not make an award for less than the amount of \$180,000 for a single budget period of 12 months. Under section 418A of the Higher Education Act (HEA), the Secretary is prohibited from making an award for less than the stated award amount. Therefore, we will reject any application that proposes a CAMP award that is less than the stated minimum award amount."

FY 2024 HEP and CAMP Application FAQs: <u>https://oese.ed.gov/files/2023/11/FY-2024-HEP-and-CAMP-Application-FAQs-Final-11.14.23.pdf</u>

FY 2024 HEP NIA: https://www.federalregister.gov/documents/2023/11/14/2023-25001/applications-for-new-awards-high-school-equivalency-program

FY 2024 CAMP NIA: <u>https://www.federalregister.gov/documents/2023/11/14/2023-</u>24999/applications-for-new-awards-college-assistance-migrant-program

3. Is the budget amount related to the number of students served? Is there a guideline for determining cost per student served?

Answer: Please see information below taken from the 2024 HEP and CAMP Application FAQs:

"Q7. What is the recommended cost per student for HEP and CAMP projects? A7. The Department does not provide a recommended cost per student for HEP and CAMP projects. However, the Department has established efficiency targets for the three types of HEP and CAMP projects: commuter, residential/commuter, and residential. These targets are based on the cost per HEP student who receives their High School Equivalency (HSE) diploma and per CAMP student who successfully completes the first year of postsecondary education and subsequently continues postsecondary education.

The HEP and CAMP efficiency targets for FY 2024 are:

- FY 2024 HEP Efficiency Targets:
 - The cost per HSE attainer in HEP Commuter projects \$10,438
 - The cost per HSE attainer in HEP Commuter Residential projects \$16,451
 - \circ The cost per HSE attainer in HEP Residential projects \$20,324
- FY 2024 CAMP Efficiency Targets:
 - The cost per first year CAMP completer in CAMP Commuter projects that continued their postsecondary education \$16,194
 - The cost per first year CAMP completer in CAMP Commuter-Residential projects that continued their postsecondary education \$19,735
 - The cost per first year CAMP completer in CAMP Residential projects that continued their postsecondary education \$25,952."

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Application Format:

4. The page limit is suggested at 25 pages, but the NIA says applicants will still be considered if an applicant exceeds this page limit. If an applicant exceeds the recommended page limit, will the applicant's application be looked at in a negative manner by the reader?

Answer: The page limit is recommended. Reviewers score applications against the selection criteria. An application will not be disqualified if it exceeds the recommended page limit, and there are no selection criteria associated with page limits. More information can be found in the FY 2024 HEP and CAMP Application FAQs: <u>https://oese.ed.gov/files/2023/11/FY-2024-HEP-and-CAMP-Application-FAQs-Final-11.14.23.pdf</u>

5. Is there a page limit for the full application including cover sheet, application, and all appendices?

Answer: Please see information below taken from the FY 2024 HEP and CAMP NIAs:

"Recommended Page Limit: The application narrative is where the applicant addresses the selection criteria that reviewers use to evaluate your application. We recommend that you (1) limit the application narrative to no more than 25 pages and (2) use the following standards:

- A "page" is 8.5" x 11", on one side only, with 1" margins at the top, bottom, and both sides.
- Double space (no more than three lines per vertical inch) all text in the application narrative, including titles, headings, footnotes, quotations, references, and captions, as well as all text in charts, tables, figures, and graphs.
- Use a font that is either 12 point or larger or no smaller than 10 pitch (characters per inch).
- Use one of the following fonts: Times New Roman, Courier, Courier New, or Arial.

The recommended page limit does not apply to the cover sheet; the budget section, including the narrative budget justification; the assurances and certifications; or the one-page abstract, the resumes, the bibliography, or the letters of support. However, the recommended page limit does apply to all of the application narrative. An application will not be disqualified if it exceeds the recommended page limit."

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6. Should applicants include a table of contents, and would that count toward the page limit?

Answer: Please see information below taken from the 2024 HEP and CAMP Application FAQs:

"Q19. Does the table of contents count against the recommended 25-page narrative limit for the project narrative? A19. No."

More information can be found in the FY 2024 HEP and CAMP Application FAQs: <u>https://oese.ed.gov/files/2023/11/FY-2024-HEP-and-CAMP-Application-FAQs-Final-11.14.23.pdf</u>

Eligibility (Participant and Applicant):

7. Are individuals who do not meet the civil status requirements for student financial assistance eligible to participate in the CAMP program?

Answer: This question is included in the HEP and CAMP Non-Regulatory Guidance on Recruitment and Eligibility. Please see question and answer H6 of this Non-Regulatory Guidance:

"Are individuals who do not meet the civil status requirements for student financial assistance eligible to participate in the CAMP program?

No. While this issue is not addressed in the CAMP regulations in 34 C.F.R. Part 206, section 401(a) and (b) of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (also known as the Welfare Reform Act), which became law on August 22, 1996, states that an alien who is not a "qualified alien" may not receive what the law refers to as "Federal public benefits." The term "Federal public benefits," under section 401(c) of the Welfare Reform Act, includes "postsecondary education or any similar benefit for which payments or assistance are provided to an individual by an agency of the United States or appropriated funds of the United States." Since CAMP is a federally-funded program under which participants receive direct services in order to help them to succeed in their first year of college or university, participants who are not "qualified aliens" would be recipients of postsecondary education services, and so they are not eligible to participate in CAMP.

Section 431 of the Welfare Reform Act defines a "qualified alien" as one who has been lawfully admitted for permanent residency, as well as one who falls into one of several other narrowly defined groups, such as those formally granted asylum, refugees, and Cuban and Haitian entrants, aliens paroled into the United States for a period of at least one year, aliens granted withholding of deportation by the United States Citizenship and Immigration Services (USCIS), aliens granted conditional entry into the United States, and certain battered alien spouses and children. Thus, the Department believes that all other aliens are prohibited from receiving services under CAMP." HEP and CAMP Non-Regulatory Guidance on Recruitment and Eligibility: https://oese.ed.gov/files/2021/09/hep-camp-eligibility-non-regulatory-guidance-2012.pdf

Writing the Application:

8. Is it best to include job descriptions and resumes for all staff, or just the Project Director?

Answer: Please see information below taken from page 26 of the FY 2024 HEP and CAMP Application Packages:

"Individual Resumes for Project Directors and Key Personnel: Provide brief resumes or job descriptions that describe personnel qualifications for the responsibilities they will carry out under the project."

FY 2024 HEP Application Package: <u>https://oese.ed.gov/files/2023/11/FY-24-HEP-Application-Package-Final-11.14.23.pdf</u>

FY 2024 CAMP Application Package: <u>https://oese.ed.gov/files/2023/11/FY-24-CAMP-Application-Package-Final-11.14.23.pdf</u>

9. Which positions are considered key personnel?

Answer: Applicants are responsible for defining and identifying all key personnel positions in their applications. Additionally, as stated the FY 2024 HEP and CAMP NIAs:

"(1) [T]he Secretary considers the quality of the personnel who will carry out the proposed project. (2) In determining the quality of project personnel, the Secretary considers the extent to which the applicant encourages applications for employment from persons who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability. (Up to 3 points) (3) In addition, the Secretary considers the qualifications, including relevant training and experience, of key project personnel. (Up to 7 points)."

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10. Are Project Directors who are employed 100% by the current grant allowed to help write the new grant application?

Answer: Current HEP and CAMP staff cannot use work time funded by the grant project to complete the future HEP or CAMP grant application. Even though work time cannot be used

for application writing, HEP and CAMP staff are allowed to classify "proposal costs" as indirect costs. Proposal costs are defined as "the costs of preparing bids, proposals, or applications on potential Federal and non-Federal awards or projects, including the development of data necessary to support the non-Federal entity's bids or proposal" (2 C.F.R. § 200.460).

If a HEP or CAMP Project Director who is working on the grant project 100% of the time would like to use work time for application writing, the Project Director could ask the Institution of Higher Education (IHE)/private non-profit to cover the percentage of their salaries that corresponds to the time used for completion of the application (e.g., 10%). If this change is implemented, the Program Director would need to notify the Office of Migrant Education (OME) Program Officer so that the Program Officer can update the percentage of time in the G5/G6 system.

11. Is an external evaluator required?

Answer: An applicant should conduct its evaluation in the manner that it determines to be most effective for the project. An external evaluator is not required, and OME cannot say that one manner of evaluation is "preferred" over another. Anecdotally, many grantees find an outside evaluator to be an effective practice.

Additionally, please see information below taken from the FY 2024 HEP and CAMP NIAs: Quality of Project Evaluation (Up to 20 points):

"The Secretary considers the quality of the evaluation to be conducted of the proposed project. In determining the quality of the evaluation, the Secretary considers the following factors: 1. The extent to which the methods of evaluation are thorough, feasible, and appropriate to the goals, objectives, and outcomes of the proposed project. (Up to 10 points) 2. The extent to which the methods of evaluation will provide performance feedback and permit periodic assessment of progress toward achieving intended outcomes. (Up to 5 points) 3. The extent to which the methods of evaluation will, if well implemented, produce promising evidence (as defined in this notice) about the project's effectiveness. (Up to 5 points)."

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12. What is the definition and proximity of a geographic region?

Answer: Please see the NIA under "**2. Review and Selection Process.**" The following is from the CAMP NIA, though this same information also applies to the HEP:

"In accordance with section 418A, the Secretary makes CAMP awards based on the number, quality, and promise of the applications. Additionally, in accordance with section 418A, if the final FY 2024 CAMP and High School Equivalency Program appropriations exceed \$40,000,000, the Secretary will consider the need to provide an equitable geographic distribution of CAMP awards. The Secretary may consider the need to provide equitable geographic distribution of CAMP awards when—

- 1. Two or more applicants receive the same score at the funding cutoff for this competition;
- 2. The Secretary determines that a geographic region is overserved by current CAMP projects;
- 3. The Secretary determines that a geographic region is underserved by current CAMP projects; or
- 4. Two or more applicants propose to operate similar CAMP projects in the same geographical region.

When evaluating a potentially overserved or underserved geographic region, the Secretary may consider factors such as migrant or seasonal farmworker population data for a State or region, approximate distance between current and proposed projects, the type of entity of the current or proposed project (e.g., private nonprofit organization, 2year IHE, 4-year IHE), and the number of students proposed to be served by the current or proposed CAMP project."

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Past Performance and Prior Experience:

13. How far back is past performance considered for HEP and CAMP awards?

Answer: There is not a specific timeline noted in the HEP and CAMP regulations. We remind potential applicants that in reviewing applications in any discretionary grant competition, the Secretary may consider, under 34 C.F.R. § 75.217(d)(3), the past performance of the applicant in carrying out a previous award, such as the applicant's use of funds, achievement of project objectives, and compliance with grant conditions, including whether the applicant failed to submit a performance report. In addition, in making a competitive grant award, the Secretary requires various assurances, including those applicable to Federal civil rights laws that prohibit discrimination in programs or activities receiving Federal financial assistance from the Department (34 C.F.R. § 100.4, § 104.5, § 106.4, § 108.8, and § 110.23). This information is from the FY 2024 HEP and CAMP NIAs. Further, here is the link to 34 C.F.R. § 75.217, "How the Secretary selects applications for new grants," which is cited in the NIA: https://www.ecfr.gov/current/title-34/subtitle-A/part-75/subpart-D/subject-group-ECFR9f4a75686de6851/section-75.217

14. In determining Competitive Preference Priority – Consideration of Prior Experience points, does OME follow its own internal processes for determining the points distinct from the applicant's project narrative OR are the points based on information provided in the applicant's project narrative?

Answer: Under <u>34 C.F.R. 75.105(c)(2)(i)</u>, the Department awards up to an additional 15 points to an application for this Competitive Preference Priority - Consideration of Prior Experience. Projects that are expiring (HEP or CAMP grantees in their final budget period that received their current HEP or CAMP award in FY 2019) will be considered for additional points under this Competitive Preference Priority. These points are awarded by the Department based on the grantee's prior performance as determined by related data already collected by the Department. More information on the components the Department considers can be found in the NIA.

Please note that the Competitive Preference Priority – Consideration of Prior Experience is not in the selection criteria in the FY 2024 HEP and CAMP NIAs. Applicants are not asked to respond to the Competitive Preference Priority – Consideration of Prior Experience. If applicants would like to include information about their prior experience implementing HEP or CAMP grant(s), they may do so under the Abstract section, Project Design section of the application, or any other section of the Project Narrative as the applicant sees fit, but such inclusion does not affect how the Department considers additional points under the Competitive Preference Priority – Consideration of Prior Experience.

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15. Should applicants address the Competitive Preference Priority – Consideration of Prior Experience in the project narrative?

Answer: Please note that the Competitive Preference Priority – Consideration of Prior Experience is not in the selection criteria in the FY 2024 HEP and CAMP NIAs. Applicants are not asked to respond to the Competitive Preference Priority – Consideration of Prior Experience. If applicants would like to include information about their prior experience implementing HEP or CAMP grant(s), they may do so under the Abstract section, Project Design section of the application, or any other section of the Project Narrative as the applicant sees fit, but such inclusion does not affect how the Department considers additional points under the Competitive Preference Priority – Consideration of Prior Experience.