

## GRANT INFORMATION

### ***Overview of the Consolidation Authority***

The Consolidated Grant for the Insular Areas (Consolidated Grant) is authorized under 48 U.S.C. 1469a. Regulations pertaining to these grants are located in 34 CFR 76.125 – 76.137 of the Education Department General Administrative Regulations (EDGAR).

This authority allows the Insular Areas to 1) apply for one or more eligible State-administered formula grant programs under one Consolidated Grant application, and 2) choose how to allocate the funds awarded in the Consolidated Grant among programs included in that application. The Insular Areas are defined as American Samoa, the Commonwealth of the Northern Mariana Islands, Guam and the U.S. Virgin Islands. The Insular Areas submit one application—*every three years*—for any two or more authorized formula grant programs eligible for consolidation.

The application may need to be amended as implementation occurs (e.g., lessons learned, cost savings.) In the spirit of continuous improvement, applicants will be allowed to amend their applications, as necessary, subject to Department approval when indicated.

### ***Purpose of the Consolidation Authority***

The purpose of the Consolidated Grant is to simplify the application and reporting procedures that would otherwise apply for each of the programs included in the Consolidated Grant application. Secondly, the Consolidated Grant provides Insular Areas flexibility in allocating funds to achieve any of the purposes under the programs that are consolidated.

### ***Programs Eligible for Consolidation***

The Department has the discretion to determine which formula grant programs may be included in an Insular Area's Consolidated Grant. There are nine U.S. Department of Education (Department) programs eligible for consolidation, subject to appropriations. Eight of these programs are administered by the Office of Elementary and Secondary (OESE), seven of which are authorized under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA). The eligible programs authorized under ESEA are:

- (1) Title I, Part A – Local Educational Agency (LEA) Grants (Title I-A);
- (2) Title I, Part B – State Assessment Grants (Title I-B);
- (3) Title II, Part A – Supporting Effective Instruction State Grants (Title II-A);
- (4) Title III, Part A – English Language Acquisition State Grants (Title III-A);
- (5) Title IV, Part A – Student Support and Academic Enrichment Grants (Title IV-A or SSAE);
- (6) Title IV, Part B – 21st Century Community Learning Centers (Title IV-B); and
- (7) Title V, Part B, Subpart 2 – Rural and Low-Income School Program (Title V-B or RLIS).

The eighth program administered by OESE is the Education for Homeless Children and Youths Grants (EHCY) authorized by the McKinney-Vento Homeless Assistance Act (McKinney-Vento).

The ninth program, the Career and Technical Education–Basic State Grants Program, is authorized by the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V), and is administered by the Office of Career, Technical, and Adult Education (OCTAE).

### ***Consolidated Grant Award Amount***

The amount of an Insular Area’s Consolidated Grant is the sum of the allocation the Insular Area receives under each of the eligible Federal grant programs that it has decided to include in its Consolidated Grant application. As required in EDGAR §76.131(c)(1), an Insular Area must identify how funds, including any anticipated carryover funds from the preceding year (see EDGAR §76.131(c)(4)), will be allocated among the Federal programs included in its application. The FY 2024 Consolidated Grant Budget Allocation Table is included in this application package.

### ***Carryover Funds (Tydings Amendment)***

The statutory authority for the period for obligating carryover funds is known as the “Tydings Amendment,” 20 U.S.C. 1225(b). Also, see EDGAR § 76.709. In general, under this provision, any funds not obligated and expended during the period for which they were awarded become carryover funds and may be obligated and expended during the succeeding fiscal year. As specified in section 421(b)(2) of GEPA and EDGAR § 76.710, any such carryover funds must be obligated and expended in accordance with the Federal statutes and regulations that apply to the program and are in effect for the carryover period, as well as the program plan or application submitted and in effect for the carryover period.

FY 2024 funds not obligated by the end of the period of performance (July 1, 2024 – September 30, 2025) shall remain available for an additional 12 months through September 30, 2026. Carryover funds must be obligated and expended in a manner consistent with the Consolidated Grant application in place during the carryover year (see EDGAR § 76.137). Therefore, with respect to an allocation of FY 2024 funds, the potential for carryover would not exist until after the first 15 months of funding (e.g., not until October 1, 2025.) The carryover year for any FY 2024 Consolidated Grant funds would be October 1, 2025 – September 30, 2026.

Although the Tydings Amendment allows funds to be used during a carryover year, to ensure students and educators are receiving timely supports and services, as proposed in the Consolidated Grant application, we encourage grantees to use the funds for the fiscal year in which they were allocated.

**Note:** FY 2023 Consolidated Grant funds do not become carryover funds until October 1, 2024. In developing their FY 2024 applications, applicants are encouraged to review their current expenditure rates and project the amount of FY 2023 carryover that will be available after October 1, 2024.

### ***Uses of Funds***

An Insular Area may only use and administer funds received under a Consolidated Grant to carry out one or more of the eligible programs whose funds it has included in the consolidation. An Insular Area must comply with the statutory and regulatory requirements that apply to the program or programs that it is implementing under the Consolidated Grant and should make sure that appropriate officials and staff become familiar with all applicable statutory and regulatory requirements, both programmatic and fiscal.

**Note:** In using funds under the Consolidated Grant, an Insular Area must ensure that non-Federal funds will not be supplanted by Federal funds made available under the programs included in the Consolidated Grant. This means that an Insular Area's use of Consolidated Grant funds must be supplemental, and the Insular Area may not decrease State or local funds for particular activities simply because of the availability of the Consolidated Grant funds.

If consolidating funds under either Title IV-A or Title I-A:

- Title IV-A (and using \$30,000 or more at the LEA level), there must be a comprehensive needs assessment at the LEA level to examine needs for improvement of access for, and opportunities to, a well-rounded education for all students; school conditions for student learning in order to create a healthy and safe school environment; and access to personalized learning experiences supported by technology and professional development for the effective use of data and technology (Section 4106(d)(1) of the ESEA).
- Title I-A also requires a needs assessment (e.g., State Plans (Section 1111(d)(1)(B)(iii)), Schoolwide programs (Section 1114 (b)(6)), Targeted Assistance schools (Section 1115 (e)(2)(A)).

### ***Programs Excluded from the Consolidated Grant Application***

An Insular Area must first determine which programs it is going to consolidate. If an Insular Area excludes one or more of the Federal programs eligible for consolidation from its Consolidated Grant application, it must submit a single application to the Federal program office where the excluded program is housed in order to receive grant funding for that particular program. Those funds should not be included in the Consolidated Grant application. A program contact is identified for each Federal program on the "Eligible Program Statutes with Contact Information" list included in this application. Contact the respective Federal program officer for instructions and technical assistance regarding application submission requirements.

### ***Project Narrative and Budget Narrative***

The application requires a Project Narrative and a corresponding Budget Narrative that details how Federal grant funds will be used for each State and local project for both public schools and for equitable services to children in private, non-profit schools. It should be noted that items identified in the Budget Narrative must correspond with the details provided in the Project Narrative. The FY 2023 Project Narrative will serve as the basis for the three-year plan the applicant intends to implement; however, the Budget narratives will require annual updates to address budget decisions based on new fiscal year allocations. The applicant must submit modified project narratives if there is a change in equitable services, goals and objectives, or

other project components (i.e., personnel; number of students; or project activities to be implemented).

### ***Budget and Performance Periods***

Once approved, the Consolidated Grant application will serve as the approved application for FY 2023-FY 2025. However, in order to receive FY 2024 and FY 2025 Consolidated Grant funds, the applicant must annually submit the:

- Application Information Form
- Consolidated Grant Allocation Worksheet – Given fluctuations in the Congressional appropriation from year-to-year and how the applicant opts to allocate its Consolidated Grant funds, a revised Consolidated Grant Allocation Worksheet is required annually.
- Year 2 or Year 3 Form (Only Required for either Year 2 or Year 3 annual submission)
- Restricted Indirect Cost Rate Agreement
- Unrestricted Indirect Cost Rate Agreement
- RLIS Waiver Request Form (If Applicable)
- Disclosure of Lobbying Activities (Standard Form LLL)
- Assurances for Non-Construction Programs (SF 424B)
- EDGAR Assurances
- General Education Provisions Act (GEPA) Statement
- Budget Narrative(s) – To address the funding shifts, the applicant must annually identify where it will allocate its Consolidated Grant funds by project. **Note for both the Worksheet and the Budget Narrative: The funds allocated to particular projects must equal the overall allocation for that program (e.g., RLIS Project #1 - \$100,000, RLIS Project #2 - \$900,000, which equals the Total RLIS Consolidation of \$1,000,000).**
- Project Narrative(s) – The applicant must submit modified project narratives if there is a change in equitable services, goals and objectives, or other project components (i.e., personnel; number of students; or project activities to be implemented).
- Means of Evaluating Program Outcome(s) – In order to evaluate the grantee’s annual progress toward its goals, the “Means of Evaluating Program Outcome(s)” chart must be updated annually to account for revised performance measures and quarterly targets.
- Annual Performance Report –The applicant must still adhere to 2 CFR 200.327 and 200.328, which governs Federal awards and requires the non-Federal entity to submit, no later than 90 calendar days after the period of performance, all required financial and performance reports.

### ***Equitable Participation***

If an Insular Area is consolidating funds under Title I-A, RLIS, or any of the programs listed in section 8501(b) of the ESEA (see “Legal and Regulatory Information” in this application package), then the Insular Area must engage in timely and meaningful consultation with private school officials before making any decisions affecting the opportunities of eligible private school children, teachers, and other personnel to participate in these programs. This includes decisions regarding which programs to include in the Consolidated Grant application. Thus, consultation should take place before the submission of the Consolidated Grant application, and continue

throughout the development and implementation of the programs included in the Consolidated Grant application (at the beginning of each fiscal year and throughout the three-year cycle).

Since the RLIS program does not have a requirement to provide for the equitable participation of private school students, an Insular Area may consolidate funds under RLIS only if it seeks a waiver to enable the provision of equitable services to private school students and teachers. The “RLIS Waiver Request Form” is included in this application package and can also be found on the Department’s website at: <https://oese.ed.gov/offices/office-of-formula-grants/rural-insular-native-achievement-programs/consolidated-grants-to-the-insular-areas/applicant-information-consolidated-grants-to-the-insular-areas/>. The form requests a waiver of the uses of funds provision in section 5222 of RLIS (to permit Insular Areas to provide equitable services under RLIS). In addition, an applicant that consolidates under RLIS must also submit Project Narratives with corresponding Budget Narratives for projects for services to students in private schools as described in the paragraph above.

If an Insular Area consolidates funds under a Federal program with an equitable participation requirement, then the Consolidated Grant application should include a “Project Narrative” and a corresponding “Budget Narrative” that details how Federal grant funds will benefit the specific needs of the private school students rather than the general needs of the private schools. This requirement ensures that projects that serve students in private schools are authorized activities that are supplemental in nature.

For purposes of the application, all private schools in which the Insular Area is providing the **same** project or service may all be included under one Project and Budget Narrative. This Project and Budget Narrative must remain **separate** from the Project and Budget Narrative for public schools (even if the project or service is the same). However, if a project or service is not the same across multiple private schools (i.e., private schools whose students will be provided with services that will **not** be provided for students in other private schools), separate Project and Budget Narratives are required. The Department’s intent is to ensure equitable participation of students in private schools, while limiting the applicant’s documentation burden.

### ***Reporting Requirements***

Although the Consolidated Grant has moved to a three-year application cycle, the Insular Areas are still required to submit an Annual Performance Report containing information covering the Federal programs for which the Consolidated Grant is used and administered, including the financial and program performance information required under 2 CFR 200.327 and 200.328. The applicant is expected to assess and report on the progress in implementing the Consolidated Grant. For each project within the approved application, the grantee should include, in the Annual Performance Report, a comparison of actual accomplishments to the objectives of the award established for the period, quantifiable accomplishments, performance trend data and analysis, among other data (2 CFR 200.328(b)(2)). The Annual Performance Report is due 90 days after the period of performance ends. In the case of the FY 2023 grant award, the end of the period of performance is September 30, 2024. For specific requirements on grantee reporting, see section 76.132(a)(5) of EDGAR.

The program office will also conduct grant monitoring, which will be an ongoing conversation between the designated Program Officer(s) and the grantee and will include routine requests for data submissions.