Administration for Community Living

Administration on Aging

Pension Counseling & Information Projects
HHS-2023-ACL-AOA-PCRP-0020
03/21/2023

Table of Contents

ACL Center:
Administration on Aging
Funding Opportunity Title:
Pension Counseling & Information Projects
Funding Opportunity Number:
HHS-2023-ACL-AOA-PCRP-0020
Primary CFDA Number:
93.048
Due Date for Letter of Intent:
Date will be generated on synopsis publication
Due Date for Applications:
03/21/2023
Date for Informational Conference Call:
Applications that fail to meet the application due date will not be reviewed and will receive no further consideration. You are strongly encouraged to submit your application a minimum of 3-5 days prior to the application closing date. Do not wait until the last day in the event you encounter technical difficulties, either on your end or, with https://www.grants.gov. Grants.gov can take up to 48 hours to notify you of a successful submission.

Executive Summary

Additional Overview Content/Executive Summary

Since 1993, the Administration on Aging (AoA), a part of the Administration for Community Living (ACL), has funded the Pension Counseling and Information Program (the Program) to help individuals understand and exercise their pension rights. Originally a demonstration project, pension counseling became a permanent program under Title II of the Older Americans Act (OAA) in 2000 and consists of regional counseling projects and a single national technical assistance center, the National Pension Assistance Resource Center (NPARC). ACL currently funds six regional counseling projects that serve 31 states. ACL also funds the NPARC that provides the regional counseling projects with legal training, case consultation, data collection and analysis and operational support.

The counseling projects provide individuals who reside in, have worked in, or have some other pension or employer connection to the regional service area with the following services: drafting administrative pension claims and appeals, and providing representation and support through administrative proceedings; identifying and pursuing pension benefits from clients' prior employers; answering basic questions about rights and remedies under all public and private pension systems throughout the service region; operating a region-wide outreach program to ensure public and provider awareness of the Program's broad focus of assisting individuals with pension and retirement savings problems, regardless of age or income; and targeting certain outreach efforts to those in greatest need.

Pension issues do not occur in a vacuum and accordingly ACL expects counseling projects to have the capacity to identify (issue-spot) and appropriately refer individuals with whom they are working on pensions matters for appropriate assistance, including but not limited to elder abuse. ACL expects counseling projects to pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized and adversly affected by persistent poverty and inequity. Advancing equity can create opportunities for the improvement of communities that have been historically underserved, which benefits everyone.

I. Funding Opportunity Description

Note on Exclusive Subject Matter: For purposes of this grant program, "pensions" or "pensions and retirement savings plans" include defined benefit pensions, defined contribution plans and profit-sharing plans that provide retirement income, and that are sponsored by government and private employers. This program addresses the retirement income benefits of plans. It does not engage with investments made by defined contributions or profit-sharing plans to generate that income. Pension Counseling and Information Projects are exclusively focused on gaining access for clients to pension benefits.

The need for consumer-centric trustworthy pension information and assistance has never been greater. The complexities inherent in our nation's retirement system make it practicably inaccessible to many of its participants and beneficiaries. The system is vast with private employers sponsoring more than 700,000 retirement plans in the United States, each with its own set of complicated rules.[i] Federal, State and local government employers bring thousands more plans into the mix. Each of these private and public plans represents a multifaceted interaction of federal and state labor and tax laws. Systemic issues such as pension plan underfunding, terminations and freezes are affecting millions of workers and retirees each year. And thousands more are unable to locate their retirement benefits because their former employer has changed its name, merged with another, relocated, or gone out of business altogether. Even where the plan sponsor is readily identifiable, thousands of workers apply for their pensions each year only to learn that their benefits have been miscalculated or denied altogether. Questions and issues concerning the impact of death and divorce on retirement benefits often add a further level of confusion for participants and family members. Additionally, during difficult economic times, layoffs and plant closures can lead to a wide variety of benefits issues that are particularly troublesome for workers and their families. When early access to benefits is necessitated by job loss or other life change, accurate information from a trustworthy source is essential in helping these individuals better understand how considerations of immediate financial need impact their long-term financial security.

Finding capable pension information and assistance, even for the simplest of pension questions, can be a daunting challenge. Government assistance generally will not verify benefit calculations, interpret complex plan language, or conduct the labor-intensive investigations necessary for individuals to rebuild lengthy work histories in order to prove pension eligibility. Moreover, finding a lawyer can be difficult and discouraging due to the highly specialized and complex nature of this area of practice. Pension matters of those who are most dependent on income from pension plans - low and moderate wage earners and their dependents - often are of modest fiscal value that may not attract the expertise of the private bar. These factors are compelling as income from employer-sponsored pensions and retirement savings plans is increasingly crucial for the retirement security of many Americans. This is particularly compelling with regard to pursuing a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Finding a trustworthy place to turn to for personalized, hands-on help in obtaining the benefits they have earned can make the difference between poverty or even unwanted institutional placement, and living one's retirement years with independence and dignity.

Program History

Recognizing this tremendous need, Congress directed the AoA (now a component of the Administration for Community Living) to develop demonstration projects specifically designed to help individuals understand and exercise their pension rights. Beginning in 1993, the AoA and now ACL has funded the Pension Counseling and Information Program, founded upon two service hallmarks: trustworthy and personalized consumer-centric assistance regardless of age, income or value of the pension claim; and broad-based expertise covering all employer-sponsored pension and retirement plans, regardless of sponsor type (public, private) or plan type (defined benefit, defined contribution). The program is supported by a single national technical resource and assistance center, the National Pension Assistance and Resource Center (NPARC) that provides the counseling projects with substantive legal training, case consultation, and operational coordination and support. NPARC is also charged with providing nationwide outreach, information, and referral services.

The Program has been overwhelmingly successful across a variety of measures, the most impressive of which is that it has recovered over $254 million in benefits for the tens of thousands of clients it has served. This represents a direct return to clients served of more than $9.00 for every federal funding dollar invested. The regional counseling projects and NPARC also maintain an extensive outreach program that helps individuals become aware of pension rights and of the availability of assistance though the regional counseling projects and NPARC, should they encounter a problem. Based on these successes, the Pension Counseling and

Information Program was made a permanent program in 2000, under Title II of the Older Americans Act, as amended.

ACL Program Purpose

The Pension Counseling and Information Program effort to protect financial security in retirement directly supports ACL's interests in promoting increased choice and greater independence among older adults. The activities of the program serve to enhance the financial, as well as the emotional, physical, and mental well-being of older adults, thereby increasing their capacity for independent choice with regard to health care and medication, nutrition, and living conditions, as well as planning for long-term care. These decisions, in turn, support security and independence in retirement, enabling retirees to make informed financial and other choices in retirement, and to enable retirees to remain in their own homes and communities with high quality of life. The Program significantly contributes to the overall mission of AoA in the following ways:

- Monetary recoveries help individuals achieve and maintain a steady income stream providing financial security, which in turn may allow them to remain in their homes and communities;
- Outreach information directly increases access of consumers on issues related to make informed decisions with respect to pensions and other employer-sponsored retirement plans.
- Direct information and advocacy services efficiently fill an important gap across a broad spectrum of need, since no single government agency has a comprehensive and person-centered formal responsibility to assist retirement plan participants.
- Program capacity is maximized through partnerships with community-based organizations and the aging network.

Program Approach Project Goal, Objectives and Activities

Applicants must describe in their proposal and submit a project plan that includes the primary goal of establishing or continuing a regional pension counseling project. Applications must demonstrate the sponsoring organization's ability to accomplish the following goals and activities that includes but is not limited to the following:

1. Regional Pension Counseling, Information and Referral Services. A major goal of a regional counseling projects is to provide appropriate pension information and assistance services as described in this Notice of Funding Opportunity throughout a proposed region. Key objectives and activities must include:

i. **Counseling and Information Services**

A. Case Services: Regional counseling projects must have the capacity through staff expertise, experience and operational capacity to provide direct and often detailed legal representation and other investigative and support services (excluding judicial litigation), including:

B. Providing legal representation of clients that must include administrative pension claim and appeal proceedings but excluding representation in judicial fora to include

1. Obtaining and evaluating governing plan documents and other information (such as employment and earnings records) necessary to calculate or claim benefits or exercise pension rights; and

2. Drafting and submitting benefit claims and appeals, and negotiating benefit settlement agreements, and other related advocacy assistance services ranging from brief services such as letter writing, email and telephone communications on behalf of clients, to more extensive research and investigative services.

3. Locating "lost" plan sponsors for clients who worked long enough to earn a benefit but have since lost touch with their former employer due to a company change in name, location, form or operational status.

4. Answering clients' questions about their pension plans and the laws and regulations that govern them.

ii. Referral Services: The purpose of regional counseling project referral efforts is to build and utilize a cohesive region-wide network of private and public service providers to serve clients whose needs are beyond the scope of regional counseling project pension counseling and information services. These include employee benefits litigation, preparation of Qualified Domestic Relations Orders, actuarial assessments (unrelated to case services), financial education and advice, retirement and estate planning, and related legal assistance, including but not limited to civil legal remedies for those who experience elder abuse. Applicants must demonstrate the capacity to design and deliver these services.

iii. Regional Service Delivery: Regional counseling projects serve defined geographic regions. ACL strongly recommends that regional counseling projects identify from 4 to 6 states as their proposed service region. Applicants must demonstrate the capacity to provide equivalent services and access to pension counseling and information services throughout the proposed service region. To accomplish this, applicants must demonstrate an established arrangement with an attorney licensed to practice law in each state covered by the proposed regional counseling project, with expertise in pension counseling services.

Proposals should clearly identify the justification underlying the proposed region. For example: all states might lie within a single federal court circuit; are recognized as a geographic region (Pacific Northwest, or Southeastern US); have an established network of other regional service providers; or other substantive or operational considerations.

Note: Significant additional justification will be required from applicants proposing regions consisting of states numbering fewer than 4 or greater than 6. Such justification might include data on the population within the state that is covered by or receiving income from a private or public pension or retirement income plan, and the number of pension inquiries received by government agencies, public plan offices or other sources of basic pension information within the state. ACL reserves to itself decision on funding projects with a service region of more than 6 states and will look most favorably upon proposed service regions of 4-6 states. ACL will not fund a proposal to serve less than an entire single state.

iv. Individuals Served: Regional counseling projects must provide equivalent services and equivalent access to those services described above to individuals, regardless of age or income who:

a. Reside or work in the project's service region either now or at the time the benefit was being earned; or who

b. Seek pension benefits that are sponsored, administered, trusteed or provided to workers within the service region either now or at the time the benefit was being earned.

Note: Proposed regional counseling projects that are sponsored by or housed within a larger organization that uses different geographic or individual eligibility criteria for services other than those of the proposed regional counseling project must specifically describe how the sponsor organization will maintain project fidelity to these specific eligibility criteria, and must state how it will introduce and maintain internal awareness of such different standard throughout its relevant employee populations and program operations.

v. No Charge for Service: Projects must describe in their application how they propose to be accessible and provide services at no charge to individuals served, and focus on serving including people of color and others such as with limited-English proficiency, those residing in rural areas and individuals with low-income who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality throughout the region through technologies including a toll-free phone line, and readily available experts to provide direct individual representational services and an easy-to-navigate website.

2. Regional Outreach Activities: Regional counseling projects must conduct effective and efficient region-wide outreach to maximize the intake of appropriate clients, especially people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality, including those with limited-English proficiency as well as to build and maintain successful client-referral relationships with trustworthy information and service providers. A significant portion of the project's outreach activities must be targeted to reach people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality, including those with limited-English proficiency. The primary purpose of outreach activities is to generate appropriate pension clients. Regional counseling projects are primarily responsible for outreach activities within their service region, while the NPARC is primarily responsible for nationwide or multi-regional outreach efforts. Regional counseling projects and the NPARC are required to coordinate outreach efforts to maximize impact and minimize duplication of effort.

Regional counseling project outreach must include the following objectives and activities, which mut be described in applicants' proposals:

a. Project-Specific Outreach: Outreach for pension counseling services has proven most effective when it is undertaken as a specialized initiative, separate from and /or in addition to outreach for other services offered by a sponsoring agency of a regional counseling project. Targeting certain outreach toward people of color and others such as with limited-English proficiency, those residing in rural areas and individuals with low-income who have been historically underserved, marginalized, and adversly affected by persistant poverty and inequality is encouraged. Applicants should identify which populations they propose to reach out to serve. Applicants must describe how they propose to focus the majority of project outreach should focus on populations such as those described above that are most likely to yield a steady and productive volume of pension counseling clients most in need of pension information and assistance.

i. Project Brochure and Other Outreach or Informational Materials: Regional counseling projects are required to utilize the standardized brochure developed by NPARC for the Pension Counseling and Information Program. To ensure consistent quality and character, the NPARC will produce the brochure and coordinate delivering brochure orders to the regional counseling projects. Applicants should articulate in their proposed budget a clearly identified outreach-specific budget, covering brochure along with other printing, postage, stationery, phone, internet, travel and other expenses sufficient to adequately fund an effective region-wide outreach campaign. Applicants should describe how the project will coordinate with the National Pension Assistance Resource Center (NPARC) regarding the proposed project's various outreach efforts. Regional counseling projects are primarily responsible for developing outreach strategies, information and materials specifically covering state and local government pension systems throughout the region in coordination with the NPARC; the national technical assistance project will develop materials covering plans governed by federal law.

ii. Media Relations: Proposals must demonstrate organizational experience and capacity to proactively engage with media outlets to appropriately promote the project, as well as demonstrate the ability to respond to inquiries from members of the press and other media quickly and effectively.

iii. Public events: Proposals should include descriptions of and demonstrated capacity to deliver outreach activities such as virtual and in-person public presentations, workshops, classes, seminars, use of social media, or other educational efforts and must demonstrate that such efforts:

(A) Will be primarily targeted at attracting pension clients for the project or at expanding the project's regional intake and referral network;

(B) Will focus on people of color and others such as with limited-English proficiency, those residing in rural areas and individuals with low-income who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality;

(C) Will use the applicant's demonstrated expertise in pension law, rights and remedies (as opposed to retirement or estate planning, or other financial education) to deliver the regional counseling project information and assistance; and

(D) Will not significantly reduce project resources that could otherwise be dedicated to pension counseling.

b. Regional Intake and Referral Network: Regional counseling projects are required to develop and maintain a coordinated intake and referral strategy and network that takes maximum advantage of existing sources of pension counseling clients throughout the region. Note that only the appropriate constituent services functions of elected representatives' offices may be included in the referral network. Referrals should also be anticipated and capacity demonstrated to direct individuals to appropriate resources for matters not directly related to pensions, including, but not limited to remediation of harm caused by elder abuse, and accordingly to be handled by other community legal and social services resources.

c. Tracking Outreach Activity and Outcomes: Regional counseling projects are required to track and report on their specific outreach activities, and how successful their outreach activities are at attracting appropriate clients to the project in accordance with data protocols established by the NPARC. At a minimum outreach data must include the specific outreach focus (agency, event, publication etc.), the outreach method (brochure, online, social media, letter, phone call, press release, etc.) and frequency (episodic, quarterly, annually), as well as the way each client found the regional counseling project (tied to project outreach activity as applicable). Applicants must describe in their proposal how they will comply with these requirements.

3. Programmatic Consistency: ACL has identified certain practices that contribute significantly to a project's overall success. ACL bases the following requirements for applicants to consider and address in their proposal upon experience with the program to date. ACL seeks continuous improvement and consistency across regional counseling projects in the following four key operational areas: staffing, legal training and resources, data collection and reporting, and shared learning. These key operational areas have proven over time to increase project efficiency and effectiveness in line with program goals. Regional counseling project applicants should propose objectives in these areas and explain the rationale and anticipated activities to achieve these objectives. Applicants must demonstrate the capacity, skills and knowledge to excel in each of these areas.

a. Staffing: Applicants ACL must address staffing practices that maximize regional counseling projects ability to provide the highest levels of counseling services, as well as the project's breadth and depth of experience over time.

i. Specialized Intake and Counseling Staff: Due to the significant learning curve involved in pension work, regional counseling project effectiveness and efficiencies are maximized when pension client intake and casework skills are developed in specialized staff positions, dedicated in whole or in significant part to the work of the regional counseling project. ACL believes that in pension information and assistance, specialists develop expertise more rapidly, conduct more detailed and complete client intake, and deliver higher levels of counseling service more efficiently and effectively than generalists. Regional counseling project applicants should describe how they would establish and fill specialized staff positions with demonstrable expertise in detailed pension intake and client casework as part of a larger strategy to build skill and experience over time.

ii. Lawyers in Key Positions: Applicants for regional counseling projects must commit to assuring that staff responsible for project delivery of legal services related to pension information and assistance are licensed to practice law in at least one jurisdiction within the project's service region and that a relationship is maintained with at least one licensed attorney with consumer-centric pension experience in at least one state covered by the proposed project's service region. Regional counseling project attorney specialist staff are required to supervise paralegal and other project personnel in accordance with applicable rules of professional conduct and to ensure the highest quality of pension counseling and information services. Applicants must describe how such supervision will be implemented.

iii. Maximize Direct Access to "Real-Time" Specialist Staff: Regional counseling projects must maximize the number of business hours that specialist staff are available for client intake and casework activity. Regional counseling projects must also build systems that connect potential clients to those resources as directly as possible, reducing client exposure to voicemail, phone trees, hotline generalists, or other non-specialist staff. Applicants should describe their approach to meeting these requirements.

b. Legal Training and Resources: Ensuring that regional counseling project staff maintains a sufficient knowledge base of the laws and issues affecting retirement savings plans is essential to the success of a counseling project. To that end, proposals must articulate a plan for obtaining ongoing staff development and maintaining necessary resources to serve clients. The plan must reference the training and other resources of the NPARC and may identify other resources.

i. Staff Development: Customized legal training and programmatic guidance are offered by the NPARC. Proposals must outline and reflect in the budget an adequately funded training and development plan for regional counseling project staff to be delivered in conjunction with the NPARC that includes the following core components:

(A) All new project case-working staff must attend a "Pension Basics" course provided by the NPARC;

(B) Funded pension staff in each project location must budget for and attend the annual National Pension Counseling Training Conference organized and delivered by the NPARC;

(C) Regional counseling projects must conduct, at least annually, an assessment of project substantive and skills-based training needs for all regional counseling project staff who engage in pension information and assistance work. Projects will complete an annual pension training regimen established by NPARC, and suggest any additional training needs of project staff to NPARC. Projects should include in their proposal budgeting of staff time and finances sufficient to adhere to the training regimen established by NPARC (recommended considerations are in addition to those necessary to attend the required annual Pension Counseling Project Training Conference virtually, in-person in the Washington, D.C. metropolitan area, or hybrid):

- For each funded case-working staff with 5 or fewer years of full-time pension casework experience, allow adequate staff time to *personally attend* 2 pension law training events per year of a duration sufficient to achieve the training objectives as developed by the NPARC in consultation with the regional counseling projects;
- For each funded case-working staff with more than 5 years of full-time pension casework experience, allow adequate staff time to *personally attend* 1 pension law training event per year of a duration sufficient to achieve the training objectives as developed by the NPARC in consultation with the regional counseling projects;
- For each intern, volunteer, stipend and other non-traditional staff, a minimum duration sufficient to achieve the training objectives as developed by the NPARC in consultation with the regional counseling projects of on-site, in-service or other pension law legal trainings annually. The NPARC’s “Pension Basics” course fulfills this requirement for the staff member’s first year;
- Projects may negotiate additional customized, on-site legal training, operational or programmatic consultation to be provided through the NPARC.

ii. Reference Materials: Each project must adequately budget for and maintain a comprehensive and relevant collection of employee benefits reference materials. The NPARC will recommend an appropriate set of materials regional counseling projects. This collection may be archived online. At a minimum, the collection will include one or more legal treatises covering employee benefits law and a print or electronic resource for accessing all relevant primary source reference material. All reference materials should be specifically identified by applicants in the attached budget narrative and should be sufficient to adequately support the requirement of the regional counseling project. Applicants must identify the proposed content of this collection of authorities and literature.

c. Data Collection and Reporting: Applicant must demonstrate the capacity to collect data on the applicant's activities, and report in a manner consistent with reporting methodologies established by NPARC. At a minimum the data set will include types and levels of services provided; client outcomes, pension plan and sponsor types and their contact information; legal issues involved; and client demographics (e.g., age, gender, race and income).
Note: All client data is to be presented in the aggregate and deidentified so as not to identify individual clients. Demographic information is collected only to identify data on populations and individuals who have been served by the Program.

Projects will collect and report aggregate data on the regional project's activities. Data should be collected for all program client contacts, including "quick calls." All projects funded under this program will submit reports to the National Pension Assistance Resource Center (NPARC) for analysis. Projects will be expected to electronically store and share all plan documents and related plan instruments in a manner consistent and compatible with all projects, and make the documents available to NPARC for redistribution to other projects, clients, and advocates as appropriate. Projects will also maintain a dataset of plan sponsor and administer information related to the documents collected. Proposals should ensure adequate budgetary resources are dedicated for personnel, hardware, software or other resources necessary to ensure accurate and timely collection of project data.

d. Shared Learning: ACL seeks consistency and continuous quality improvement across the regional counseling projects in their implementation of practices that maximize the projects' ability to provide the highest levels of service to their clients. Projects are expected to share their own insights regarding client casework, outreach and project operations with others, in an effort to move toward more consistent operations among projects. Project staff will utilize NPARC resources for this purpose. The annual National Pension Counseling Training Conference will serve among the vehicles for identifying and sharing best practices.

Statutory Authority

Title II, Section 215 of the Older Americans Act (OAA) (42U.S.C. 3032), as amended in 2020 (P.L. 116-131)

II. Award Information

Funding Instrument Type:
CA (Cooperative Agreement)

Estimated Total Funding:
$1,200,000

Expected Number of Awards:
6

Award Ceiling:
$300,000
Per Budget Period

Award Floor:
$188,000
Per Budget Period

Length of Project Period:
60-month project period with five 12-month budget periods

Additional Information on Project Periods and Explanation of 'Other'
Once a cooperative agreement is in place, requests to modify or amend it or the work plan may be made by ACL or the awardee at any time as long as it stays within the original confines of the proposed project description. Major changes may affect the integrity of the competitive review process. Modifications and/or amendments of the Cooperative Agreement or work plan shall be effective upon the execution of an award notice. When an award is issued the cooperative agreement terms and conditions from the program announcement are incorporated by reference unless ACL is authorized under the Terms and Conditions of award, 45 CFR Part 75, or other applicable regulation or statute to make unilateral amendments.

III. Eligibility Information

1. Eligible Applicants

For FY 2023 the below guidance is provided to advance the Administration's policy, as stated in E.O. 13985, to "pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality." This guidance is intended to begin to address inequities in HHS programs, processes, and policies that may serve as barriers to equal opportunity. By advancing equity in our NOFOs, we can "create opportunities for the improvement of communities that have been historically underserved, which benefits everyone."

Domestic public or private non-profit entities including state and local governments, Indian tribal governments and organizations (American Indian/Alaskan Native/Native American), faith-based organizations, community-based organizations, hospitals, and institutions of higher education, with a proven record of advising and representing individuals who have been denied employer or union-sponsored retirement income benefits, and which have the capacity to deliver services on a regional basis.

Individuals, foreign entities, and sole proprietorship organizations are not eligible to compete for, or receive, awards under this announcement.
Faith-based and community organizations that meet eligibility requirements are eligible to receive awards under this funding opportunity announcement

2. Cost Sharing or Matching

Cost Sharing / Matching Requirement:
Yes
For awards that require matching or cost sharing by statute, recipients will be held accountable for projected commitments of non-federal resources (at or above the statutory requirement) in their application budgets and budget justifications by budget period, or by project period for fully funded awards. The applicant will be held accountable for all proposed

non-federal resources as shown in the Notice of Award (NOA). **A recipient's failure to provide the statutorily required matching or cost sharing amount (and any voluntary committed amount in excess) may result in the disallowance of federal funds. Recipients will be required to report these funds in the Federal Financial Reports.**

Under this ACL program, ACL will fund no more than 75% of the project’s total cost, which means the applicant must cover at least 25% of the project’s total cost with non-Federal resources. In other words, for every three (3) dollars received in Federal funding, the applicant must contribute at least one (1) dollar in non-Federal resources toward the project’s total cost.

This “three-to-one” ratio is reflected in the following formula which you can use to calculate the minimum required match.

(**Federal Funds Requested**) times (**Match Percentage**) divided by (**Inverse Match Percentage**)

Here are examples of varying match levels

Federal Funds Requested X Match Percentage / Inverse Match Percentage	**Minimum Match Requirement**
($100,000 X 5%) / (95%)	$5,263
($100,000 X 25%) / (75%)	$33,333
($100,000 X 35%) / (65%)	$53,846
($100,000 X 45%) / (55%)	$81,818

A common error applicants make is to match 25% of the Federal share, rather than 25% of the project’s total cost.

There are two types of match: 1) non-Federal cash and 2) non-Federal in-kind. In general, costs borne by the applicant and cash contributions of any and all third parties involved in the project, including sub-grantees, contractors and consultants, are considered matching funds.

Under this ACL program, ACL will fund no more than 75% of the project’s total cost, which means the applicant must cover at least 25% of the project’s total cost with non-federal resources. In other words, for every three (3) dollars received in federal funding, the applicant must contribute at least one (1) dollar in non-federal resources toward the project’s total cost. This “three-to-one” ratio is reflected in the formula included under Item 18 in the “Instructions for Completing Requested Forms.” You can use this formula to calculate your minimum required match. A common error applicants make is to match 25% of the federal share, rather than 25% of the project’s total cost.

There are two types of match: 1) non-federal cash and 2) non-federal in-kind. In general, costs borne by the applicant and cash contributions of any and all third parties involved in the project, including sub-grantees, contractors and consultants, are considered matching funds. Volunteered time and use of facilities to hold meetings or conduct project activities may be considered in-kind (third party) donations. Examples of non-federal cash match includes budgetary funds provided from the applicant agency’s budget for costs associated with the *project. ACL encourages you to not exceed the minimum match requirement. Applications with a match greater than the minimum required will not receive additional consideration under the review. Match is not one of the responsiveness criteria as noted in Section III, 3 Application Screening Criteria.*

3. Responsiveness and Screening Criteria

Application Responsiveness Criteria

Applications that fail to meet the responsiveness criteria described below will not be reviewed and will receive no further consideration.

Application Screening Criteria

The successful applicant will be an organization that meets the following criteria:

1. Demonstrates a proven record of expertise in advising and representing individuals who have questions about or who have been denied or access to employer or union-sponsored retirement pension benefits or access has been otherwise compromised; and
2. Demonstrates a proved record of staff expertise, and a relationship with a licensed attorney with expertise, in each state proposed to be serviced by the applicant, to deliver pension counseling services.
3. Demonstrate a capacity to deliver region-wide pension client referral services and consumer-centric pension outreach program.

Applications that do not meet the above responsiveness criteria will be administratively eliminated and will NOT be reviewed.

All applications will be screened to assure a level playing field for all applicants. Applications that fail to meet the three screening criteria described below will not be reviewed and will receive no further consideration.

In order for an application to be reviewed, it must meet the following screening requirements:

1. *Applications must be submitted electronically via https://www.grants.gov by 11:59 p.m., Eastern Time, by the **due date listed in section IV.3 Submission Dates and Times**.*
2. *The Project Narrative section of the Application must be **double-spaced**, on 8.5” x 11” plain white paper with **1” margins** on both sides, and a **standard font size of no less than 11 point, preferably Times New Roman or Arial**.*
3. *The Project Narrative must not exceed 20 pages. **Project Narratives that exceed 20 pages** will have the additional pages removed and only the first 20 pages of the Project Narrative will be provided to the merit reviewers for funding consideration. **NOTE**: The Project Work Plan, Letters of Commitment, and Vitae of Key Project Personnel are not counted as part of the Project Narrative for purposes of the 20-page limit.*

Unsuccessful submissions will require authenticated verification from https://www.grants.gov indicating system problems existed at the time of your submission. For example, you will be required to provide an https://www.grants.gov submission error notification and/or tracking number in order to substantiate missing the application deadline.

IV. Application and Submission Information

1. Address to Request Application Package

Application materials can be obtained from https://www.grants.gov or https://www.acl.gov/grants/applying-grants.

Please note, ACL requires applications for all announcements to be submitted electronically through http://www.grants.gov in Workspace. Grants.gov Workspace is the standard way for organizations and individuals to apply for federal grants in Grants.gov. An overview and training on Grants.gov Workspace can be found here at: https://www.grants.gov/web/grants/applicants/workspace-overview.html

The Grants.gov registration process can take several days. If your organization is not currently registered, please begin this process immediately. For assistance with https://www.grants.gov, please contact them at support@grants.gov or 800-518-4726 between 7:00 a.m. and 9:00 p.m. Eastern Time.

- At the https://www.grants.gov website, you will find information about submitting an application electronically through the site, including the hours of operation. ACL strongly recommends that you do not wait until the application due date to begin the application process because of the time involved to complete the registration process.
- All applicants must have a UEI and be registered with the System for Award Management (SAM, www.sam.gov) and maintain an active SAM registration until the application process is complete, and should a grant be made, throughout the life of the award. Effective June 11, 2018, when registering or renewing your registration, you must submit a notarized letter appointing the authorized Entity Administrator. Please be sure to read the FAQs located at www.sam.gov to learn more. Applicants should allot sufficient time prior to the application deadline to finalize a new, or renew an existing registration. This action should allow you time to resolve any issues that may arise. Failure to comply with these requirements may result in your inability to submit your application or receive an award. Maintain documentation (with dates) of your efforts to register or renew at least two weeks before the deadline. See the SAM Quick Guide for Grantees at: https://www.sam.gov/SAM/pages/public/help/samQUserGuides.jsf.

Note: Once your SAM registration is active, allow 24 to 48 hours for the information to be available in Grants.gov before you can submit an application through Grants.gov. This action should allow you time to resolve any issues that may arise. Failure to comply with these requirements may result in your inability to submit your application or receive an award.

- Note: Failure to submit the correct EIN Suffix can lead to delays in identifying your organization and access to funding in the Payment Management System.
- Effective October 1, 2010, HHS requires all entities that plan to apply for and ultimately receive federal grant funds from any HHS Operating/Staff Division (OPDIV/STAFFDIV) or receive subawards directly from the recipients of those grant funds to:

1. Register in SAM prior to submitting an application or plan;

2. Maintain an active SAM registration with current information at all times during which it has an active award or an application or plan under consideration by an OPDIV; and
3. Provide its UEI number in each application or plan to submit to the OPDIV.

Additionally, all first-tier subaward recipients must have a UEI number at the time the subaward is made.

- The Federal Government will transition from the DUNS Number to the New Unique Entity Identifier. As of April of 2022, the federal government stopped using the DUNS number to uniquely identify entities. At that point, entities doing business with the federal government will use a Unique Entity Identifier (SAM) created in SAM.gov. It is entered on the SF-424. It is a unique, nine-digit identification number, which provides unique identifiers of single business entities.
- You must submit all documents electronically, including all information included on the SF424 and all necessary assurances and certifications. In accordance with the Federal Government's efforts to reduce reporting burden for recipients of federal financial assistance, the general certification and representation requirements contained in the Standard Form 424B (SF-424B) – Assurances – Non-Construction Programs, and the Standard Form 424D (SF-424D) – Assurances – Construction Programs, have been standardized federal-wide. Effective January 1, 2020, the updated common certification and representation requirements will be stored and maintained within SAM. Organizations or individuals applying for federal financial assistance as of January 1, 2020, must validate the federally required common certifications and representations annually through SAM located at SAM.gov.
- After you electronically submit your application, you will receive an automatic acknowledgment from https://www.grants.gov that contains https://www.grants.gov tracking number. The Administration for Community Living will retrieve your application form from https://www.grants.gov.

U.S. Department of Health and Human Services
Administration for Community Living

Jeremy Bell, Aging Services Program Specialist

2. Content and Form of Application Submission

Letter of Intent

Number of Days from Publication 30

Date will be generated on synopsis publication
Applicants are requested, but not required, to submit a letter of intent to apply for this funding opportunity to assist ACL in planning for the application independent review process. The purpose of the letter of intent is to allow our staff to estimate the number of independent reviewers needed and to avoid potential conflicts of interest in the review. Letters of intent should be sent to:

U.S. Department of Health and Human Services

Administration for Community Living

Jeremy Bell

Office of Elder Justice and Adult Protective Services

Email: jeremy.bell@acl.hhs.gov

Project Narrative

The Project Narrative must be double-spaced, on 8.5” x 11” paper with 1” margins on both sides, and a standard font size of no less than 11 point, preferably Times New Roman or Arial. You can use smaller font sizes to fill in the Standard Forms and Sample Formats. The suggested length for the Project Narrative is 10 to 20 pages; 20 pages is the maximum length allowed. Project Narratives that exceed 20 pages will have the additional pages removed and only the first 20 pages of the Project Narrative will be provided to the merit reviewers for funding consideration. The Project Work Plan, Letters of Commitment, and Vitae of Key Personnel are not counted as part of the Project Narrative for purposes of the 20-page limit, but all of the other sections noted below are included in the limit. A new requirement for all Project Narratives is a section that explains the equity experience of the project team.

The sample components of the Project Narrative counted as part of the 20 page limit include:

- *Summary/Abstract*
- *Problem Statement*
- *Goal(s) and Objective(s)*
- *Proposed Intervention*
- *Special Target Populations and Organizations*
- *Outcomes*
- *Project Management*
- *Evaluation*
- *Dissemination*
- *Organizational Capability*
- *Equity Experience of Project Team*

Problem Statement

Specifically, this section should identify the types, severity and prevalence of pension issues within the proposed region that can be addressed by the proposed counseling project. Applicants are expected to demonstrate an understanding of what populations are most affected by these pension issues, noting any proposed target populations and the unique nature of pension problems they encounter, as appropriate.

Goals and Objectives

In responding to this Notice of Funding Opportunity announcement, we recommend that your one goal be to provide regional pension counseling and information services to your proposed region. Proposed objectives should be organized around the following themes: regional counseling & information services, regional outreach activities, and programmatic consistency.

Proposed Intervention

Description of intervention activities should be organized around the following themes:
(A) Regional counseling & referral services
(B) Regional outreach activities, including discussion of targeting
(C) Programmatic consistency

Special Target Populations and Organizations

This section should describe how you plan to involve organizations in a meaningful way in the planning and implementation of the proposed project. This section should also describe whether, and if so, how the proposed intervention will target disadvantaged populations, including limited-English speaking populations, those of greatest economic need and those of greatest social need. Applicants should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.

Please describe how you plan to reach underserved/under-resourced communities including but not limited to individuals who are Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; and persons who live in rural areas.

Outcomes

This section of the project narrative must clearly identify the measurable outcome(s) that will result from the project. (NOTE: ACL will not fund any project that does not include measurable outcomes). This section should also describe how the project's findings might benefit the field at large, (e.g., how the findings could help other organizations throughout the nation to address the same or similar problems.) List measurable outcomes in the work plan grid under "Measurable Outcomes" in addition to any discussion included in the narrative along with a description of how the project might benefit the field at large (Please reference the optional Sample Work Plan Template included under the Downloads for this Funding Opportunity Announcement as posted at http://www.acl.gov/Funding_Opportunities/Announcements/Index.aspx)

A "measurable outcome" is an observable end-result that describes how a particular intervention benefits consumers. It demonstrates the functional status, mental well-being, knowledge, skill, attitude, awareness or behavior. It can also describe a change in the degree to which consumers exercise choice over the types of services they receive, or whether they are satisfied with the way a service is delivered. Additional examples include: a change in the responsiveness or cost-effectiveness of a service delivery system; a new model of support or care that can be replicated in the aging network; new knowledge that can contribute to the field of aging; a measurable increase in community awareness; or a measurable increase in persons receiving services. A measurable outcome is not a measurable "output", such as: the number of clients served; the number of training sessions held; or the number of service units provided.

You should keep the focus of this section on describing what outcome(s) will be produced by the project. You should use the Evaluation section noted below to describe how the outcome(s) will be measured and reported.

Your application will be scored on the clarity and nature of your proposed outcomes, not on the number of outcomes cited. It is totally appropriate for a project to have only ONE outcome that it is trying to achieve through the intervention reflected in the project's design.

Project Management

This section should include a clear delineation of the roles and responsibilities of project staff, consultants and partner organizations, and how they will contribute to achieving the project's objectives and outcomes. It should specify who would have day-to-day responsibility for key tasks such as: leadership of project; monitoring the project's on-going progress, (i.e., measure of performance towards the goals stated in the funding opportunity announcement and for your specific intervention/activities) preparation of reports; communications with other partners and ACL. It should also describe the approach that will be used to monitor and track progress on the project's tasks and objectives.

Evaluation

This section should describe the specific outcomes (e.g., changes in clients, organizations, and/or communities) expected as a result of this funding as well as method(s), techniques and tools that will be used to:
1) determine whether the proposed intervention achieved its anticipated outcome(s), and
2) document the "lessons learned" - both positive and negative - from the project that will be useful to people interested in replicating the intervention, if it proves successful.

Dissemination

This section should describe the method that will be used to disseminate the project's results and findings in a timely manner and in easily understandable formats, to parties who might be interested in using the results of the project to inform practice, service delivery, program development, and/or policy-making, including and especially those parties who would be interested in replicating the project.

Organizational Capability

Each application should include an organizational capability statement and vitae for key project personnel. The organizational capability statement should describe how the applicant agency (or the particular division of a larger agency which will have responsibility for this project) is organized, the nature and scope of its work and/or the capabilities it possesses. It should also include the organization's capability to sustain some or all project activities after Federal financial assistance has ended.

This description should cover capabilities of the applicant agency not included in the program narrative, such as any current or previous relevant experience and/or the record of the project team in preparing cogent and useful reports, publications, and other products. If appropriate, include an organization chart showing the relationship of the project to the current organization. Please attach short vitae for key project staff only. Neither vitas nor an organizational chart will count towards the narrative page limit. Also include information about any contractual organization(s) that will have a significant role(s) in implementing project and achieving project goals.

Signed letters of collaboration must specify the commitment, role, and resources/activities that will be provided in support of the applicant. Strategies to reach targeted populations must be documented with letters of commitment that detail the specific role/function in support of the project's effort that will be played by the collaborating organization. The organization's expertise, experience, and access to the targeted population(s) should also be described in the letter of commitment, which can be signed, scanned, and included as an attachment to the application submitted electronically via http://www.grants.gov.

Budget Narrative/Justification

The Budget Narrative/Justification can be provided using the format included in the document, "Budget Narrative/Justification – Sample Format." Applicants are encouraged to pay particular attention to this document, which provides an example of the level of detail sought. Applicants requesting funding for a multi-year grant program are REQUIRED to provide a combined multi-year Budget Narrative/Justification, as well as a detailed Budget Narrative/Justification for EACH potential year of grant funding requested.

Electronic Submission via www.Grants.govAdditional guidance on the submission of electronic applications can be found at http://www.grants.gov/applicants/get_registered.jsp.
If applicants encounter any technical difficulties in using www.Grants.gov, contact the Grants.gov Contact Center at: 1-800-518-4726, or by email at support@grants.gov, to report the problem and obtain assistance. Hours of Operation: 24 hours a day, 7 days a week. The Grants.gov Contact Center is closed on federal holidays.
Applicants should always retain Grants.gov Contact Center service ticket number(s) as they may be needed for future reference.

Section VII. Agency Contacts will determine whether the submission issues are due to Grants.gov system errors or user error.

Work Plan

The Project Work Plan should reflect and be consistent with the Project Narrative and Budget and should cover all five (5) years of the project period. It should include a statement of the project's overall goal, anticipated outcome(s), key objectives, and the major tasks or action steps that will be pursued to achieve the goal and outcome(s). For each major task or action step, the work plan should identify timeframes involved (including start- and end-dates), and the lead person responsible for completing the task. Please reference the optional Sample Work Plan Template included under the Downloads for this Funding Opportunity Announcement as posted at http://www.acl.gov/Funding_Opportunities/Announcements/Index.aspx

3. Unique Entity Identifier and System for Award Management (SAM)

The Grants.gov registration process can take several days. If your organization is not currently registered, please begin this process immediately. For assistance with https://www.grants.gov, please contact them at support@grants.gov or 800-518-4726 between 7:00 a.m. and 9:00 p.m. Eastern Time.

- At the https://www.grants.gov website, you will find information about submitting an application electronically through the site, including the hours of operation. ACL strongly recommends that you do not wait until the application due date to begin the application process because of the time involved to complete the registration process.
- All applicants must have a UEI number and be registered with the System for Award Management (SAM, www.sam.gov) and maintain an active SAM registration until the application process is complete, and should a grant be made, throughout the life of the award. Effective June 11, 2018, when registering or renewing your registration, you must submit a notarized letter appointing the authorized Entity Administrator. Please be sure to read the FAQs located at www.sam.gov to learn more. Applicants should allot sufficient time prior to the application deadline to finalize a new, or renew an existing registration. This action should allow you time to resolve any issues that may arise. Failure to comply with these requirements may result in your inability to submit your application or receive an award. Maintain documentation (with dates) of your efforts to register or renew at least two weeks before the deadline. See the SAM Quick Guide for Grantees at: https://www.sam.gov/SAM/pages/public/help/samQUserGuides.jsf.

Note: Once your SAM registration is active, allow 24 to 48 hours for the information to be available in Grants.gov before you can submit an application through Grants.gov. This action should allow you time to resolve any issues that may arise. Failure to comply with these requirements may result in your inability to submit your application or receive an award.

- Note: Failure to submit the correct EIN Suffix can lead to delays in identifying your organization and access to funding in the Payment Management System.
- Effective October 1, 2010, HHS requires all entities that plan to apply for and ultimately receive federal grant funds from any HHS Operating/Staff Division (OPDIV/STAFFDIV) or receive subawards directly from the recipients of those grant funds to:

1. Register in SAM prior to submitting an application or plan;
2. Maintain an active SAM registration with current information at all times during which it has an active award or an application or plan under consideration by an OPDIV; and
3. Provide its UEI number in each application or plan to submit to the OPDIV.

Additionally, all first-tier subaward recipients must have a UEI number at the time the subaward is made.

- The Federal Government will transition from the DUNS Number to the New Unique Entity Identifier. As of April of 2022, the federal government stopped using the DUNS number to uniquely identify entities. At that point, entities doing business with the federal government will use a Unique Entity Identifier (SAM) created in SAM.gov. They will no longer have to go to a third-party website to obtain their identifier. This transition allows the government to streamline the entity identification and validation process, making it easier and less burdensome for entities to do business with the federal government. If your entity is registered in SAM.gov today, your Unique Entity ID (SAM) has already been assigned and is viewable in SAM.gov. This includes inactive registrations. The Unique Entity ID is currently located below the DUNS Number on your entity registration record. Remember, you must be signed in to your SAM.gov account to view entity records. To learn how to view your Unique Entity ID (SAM) go to this help article.
- You must submit all documents electronically, including all information included on the SF424 and all necessary assurances and certifications. In accordance with the Federal Government's efforts to reduce reporting burden for recipients of federal financial assistance, the general certification and representation requirements contained in the Standard Form 424B (SF-424B) – Assurances – Non-Construction Programs, and the Standard Form 424D (SF-424D) – Assurances – Construction Programs, have been standardized federal-wide. Effective January 1, 2020, the updated common certification and representation requirements will be stored and maintained within SAM. Organizations or individuals applying for federal financial assistance as of January 1, 2020, must validate the federally required common certifications and representations annually through SAM located at SAM.gov.
- After you electronically submit your application, you will receive an automatic acknowledgment from https://www.grants.gov that contains https://www.grants.gov tracking number. The Administration for Community Living will retrieve your application form from https://www.grants.gov.

4. Submission Dates and Times

Due Date for Applications 03/21/2023

03/21/2023

Date for Informational Conference Call:
Applications that fail to meet the application due date will not be reviewed and will receive no further consideration. You are strongly encouraged to submit your application a minimum of 3-5 days prior to the application closing date. Do not wait until the last day in the event you encounter technical difficulties, either on your end or, with http://www.grants.gov. Grants.gov can take up to 48 hours to notify you of a successful submission.

In addition, if you are submitting your application via Grants.gov, you must (1) be designated by your organization as an Authorized Organization Representative (AOR) and (2) register yourself with Grants.gov as an AOR. Details on these steps are outlined at the following Grants.gov web page: http://www.grants.gov/web/grants/register.html.

After you electronically submit your application, you will receive from Grants.gov an automatic notification of receipt that contains a Grants.gov tracking number. (This notification indicates receipt by Grants.gov only)

If you are experiencing problems submitting your application through Grants.gov, please contact the Grants.gov Support Desk, toll free, at 1-800-518-4726. You must obtain a Grants.gov Support Desk Case Number and must keep a record of it.

If you are prevented from electronically submitting your application on the application deadline because of technical problems with the Grants.gov system, please contact the person listed under For Further Information Contact in section VII of this notice and provide a written explanation of the technical problem you experienced with Grants.gov, along with the Grants.gov Support Desk Case Number. ACL will contact you after a determination is made on whether your application will be accepted.

Note: We will not consider your application for further review if you failed to fully register to submit your application to Grants.gov before the application deadline or if the technical problem you experienced is unrelated to the Grants.gov system.

If for any reason (including submitting to the wrong funding opportunity number or making corrections/updates) an application is submitted more than once prior to the application due date, ACL will only accept your last validated electronic submission, under the correct funding opportunity number, prior to the Grants.gov application due date as the final and only acceptable application

Unsuccessful submissions will require authenticated verification from http://www.grants.gov indicating system problems existed at the time of your submission. For example, you will be required to provide an http://www.grants.gov submission error notification and/or tracking number in order to substantiate missing the cut off date.

Grants.gov (http://www.grants.gov) will automatically send applicants a tracking number and date of receipt verification electronically once the application has been successfully received and validated in http://www.grants.gov.

5. Intergovernmental Review

This program is not subject to Executive Order (E.O.) 12372, Intergovernmental Review of Federal Programs.

6. Funding Restrictions

The following activities are not fundable:

- *Construction and/or major rehabilitation of buildings*
- *Basic research (e.g. scientific or medical experiments)*
- *Continuation of existing projects without expansion or new and innovative approaches*

Note: *A recent Government Accountability Office (GAO) report has raised considerable concerns about grantees and contractors charging the Federal Government for additional meals outside of the standard allowance for travel subsistence known as per diem expenses. Executive Orders on Promoting Efficient Spending (E.O. 13589) and Delivering Efficient, Effective and Accountable Government (E.O. 13576) have been issued and instruct Federal agencies to promote efficient spending. Therefore, if meals are to be charged in your proposal, applicants* *should understand such costs must meet the following criteria outlined in the Executive Orders and HHS Grants Policy Statement:*

- *Meals are generally unallowable except for the following:*
    - *For subjects and patients under study (usually a research program);*
    - *Where specifically approved as part of the project or program activity, e.g., in programs providing children's services (e.g. Head Start);*
    - *When an organization customarily provides meals to employees working beyond the normal workday, as a part of a formal compensation arrangement,*
    - *As part of a per diem or subsistence allowance provided in conjunction with allowable travel; and*
    - *Under a conference grant, when meals are necessary and integral part of a conference, provided that meal costs are not duplicated in participants' per diem or subsistence allowances. (Note: conference grant means the sole purpose of the award is to hold a conference.)*

The following updated sections 2 CFR 200.216 "Prohibition on certain telecommunications and video surveillance services or equipment" became **effective on or after August 13, 2020**.

Recommended Actions for any recipient that has received a loan, grant, or cooperative agreement **on or after August 13, 2020**:

- Develop a compliance plan to implement 2 CFR 200.216 regulation.
- Develop and maintain internal controls to ensure that your organization does not expend federal funds (in whole or in part) on covered equipment, services or systems.
- Determine through reasonable inquiry whether your organization currently uses "covered telecommunication" equipment, services, or systems and take necessary actions to comply with the regulation as quickly as is feasibly possible.

7. Other Submission Requirements

None

V. Application Review Information

1. Criteria

Applicants must document all of their source material. If any text, language and/or materials are from another source, the applicant must make it clear the material is being quoted and where the text comes from. The applicant must also cite any sources when they obtain numbers, ideas, or other material that is not their own. If the applicant fails to comply with this requirement, regardless of the severity or frequency of the plagiarism, the reviewers shall reduce their scores accordingly even to the degree of issuing no points at all.

Applications are scored by assigning a maximum of 100 points across the desired review criteria:

a. Project Relevance & Current Need

b. Approach

c. Budget

d. Project Impact

e. Organizational Capacity

Project Relevance & Current Need **Maximum Points:** 10

a. Does the proposal adequately explain the relevance of this Funding Opportunity Announcement's priority areas to the needs within the applicant's proposed regional service area? Does the applicant understand the specific and current nature, varieties and prevalence of private and public pension issues facing potential clients throughout the proposed regional service area? **(5 points)**

b. Does the proposal clearly describe the relevance of the stated regional needs to the applicant's proposed delivery of services? Are the identified "need and relevance" themes appropriately and thoughtfully addressed throughout the proposal? **(5 points)**

Approach **Maximum Points:** 50

a. Goals and Objectives: Has the applicant clearly stated the goal(s) of the proposed project? Is the goal(s) of the project clearly driven by the ACL's overarching program purpose as stated in this Funding Opportunity Announcement? Are the major themes as identified in this funding opportunity clearly reflected in the proposal's organization and content? **(5 points)**

b. Activities: Is the approach clearly defined? Does it reflect a coherent and feasible approach for successfully addressing the identified problem and achieving the identified outcome(s)? Does the project take into account barriers and opportunities that exist in the larger environment that may impact on the project's success?

i. Regional Pension Counseling, Assistance and Referral Services: Does the applicant clearly explain and support its approach for delivering the full range of pension-specific case services in all states within the proposed region? Does this approach include the development or maintenance of a comprehensive referral system for non-pension issues identified for or by pension clients, including but not limited to responses to elder abuse? Does the applicant present a sound rationale for, and approach to, the proposed geographic service area and potential client populations therein, including no-charge access? **(15 points)**

ii. Regional Outreach: Does the applicant clearly explain and support its approach for outreach activities to the entire region? Does the proposal appropriately integrate the PCIP messaging and any toolkit developed by the national technical assistance resource center into its outreach activities? Does the outreach plan identify outreach materials and activities distinct from those of its sponsoring organization? Does the proposal identify appropriate aging and other community-based groups, public and private agencies, and service providers to aid the project in planning and/or executing these efforts? **(5 points)**

iii. Targeting: Has the applicant identified pension-specific needs among disadvantaged and limited-English speaking populations, people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality within the proposed region, and identified specific outreach strategies to reach those groups. Does the application describe how local community-based organizations will be involved in a meaningful way in the planning and implementation of these efforts? **(5 points)**

iv. Programmatic Consistency: Does the applicant propose an operational model that is consistent with identified staffing practices to provide consistent services in all states in the proposed region? Does the proposal adequately plan for staff development in coordination with the national technical assistance resource center? Does the proposal reflect strong commitment to the collection and reporting of client and outreach data? Does the proposal incorporate shared-learning objectives and outcomes into its proposed approach? **(5 points)**

c. Work Plan: Is the project work plan clear and comprehensive? Does it include sensible and feasible time frames for the accomplishment of tasks presented? Does the work plan include specific objectives and tasks that are clearly driven by the proposed approach, consistent with the priorities set forth in the Funding Opportunity Announcement, and directly contribute to its specified measurable outcomes? Are the roles and responsibilities of project management, staff, consultants, and partners clearly defined and linked to specific objectives, tasks, and outcomes? Has the applicant adequately planned for the appropriate training and technical support necessary for project staff, regional affiliates, and identified intake and support networks? Has the applicant planned for the involvement of the national technical assistance project in facilitating the execution of its work plan? **(15 points)**

Budget **Maximum Points:** 10

Is the budget justified with respect to the adequacy and reasonableness of resources requested? Is the time commitment of project staff, consultants, and/or partners appropriate and adequate to carry out the project? Are budget line items clearly delineated and consistent with work plan objectives? Have adequate resources been dedicated to staff development and shared learning initiatives? **(10 points)**

Project Impact **Maximum Points:** 20

a. Outcomes: Are the expected project benefits and results clear, realistic, and consistent with the objectives and purpose of the project? Are the anticipated outcomes of the proposed project likely to be achieved, and will they significantly assist individuals in understanding and exercising their pension rights? Has the applicant articulated an approach to issue- spotting and referral of related legal issues, including but not limited to civil legal remedies for elder abuse? Are the proposed outcomes measurable and consistent with the Funding Opportunity Announcement's definition of a project outcome? **(15 points)**

b. Evaluation & Dissemination: Does the approach reflect a thoughtful and well-designed methodology that will adequately measure whether the project has achieved its proposed measurable outcome(s)? Are client and outreach data collection and reporting a central component of the proposal's evaluation activities? Is the evaluation also designed to capture and communicate "lessons learned" that might be of use to others in the pension counseling community, or those interested in replicating the project? Will the dissemination plan get relevant and easy-to-use information in a timely manner to parties that might be interested in making use of its findings, particularly to those who might want to replicate the project? **(5 points)**

Organizational Capacity **Maximum Points:** 10

a. Sustainability: Does the applicant organization clearly identify its capability for carrying out the proposed project and evaluation? Is the organization sponsoring the proposed project well-situated in the community, and in the region to effectively deliver regional pension counseling and related? Does the proposal lay out a realistic contingency plan to deal with sustainability and the possibility that Federal financial assistance may not be available in the future? **(2 points)**

b. Project Management / Internal Capacity: Is the time commitment of project staff, consultants, and/or partners appropriate to carry out the project? Are the applicant organization's staff and collaborators sufficiently knowledgeable of pension law, regional service delivery, and the range of required counseling, outreach and support services to efficiently and effectively undertake the proposed approach? Are the roles and responsibilities of collaborators clear and justified based on project purpose and need? **(6 points)**

c. Collaborations: Are letters included, as appropriate, from stakeholders and organizations identified as collaborators, and do they specify the commitment, role, and resources/activities that will be provided in support of the applicant, consistent with the work plan description of their intended roles and contributions or are they mere generic statements of support? **(2 points)**

2. Review and Selection Process

An independent review panel of at least three individuals will evaluate applications that pass the screening and meet the responsiveness criteria if applicable. These reviewers are experts in their field, and are drawn from academic institutions, non-profit organizations, state and local governments, and federal government agencies. Based on the Application Review Criteria as outlined under section V.1, the reviewers will comment on and score the applications, focusing their comments and scoring decisions on the identified criteria.

Final award decisions will be made by the Administrator, ACL. In making these decisions, the Administrator will take into consideration: recommendations of the review panel; reviews for programmatic and grants management compliance; the reasonableness of the estimated cost to the government considering the available funding and anticipated results; and the likelihood that the proposed project will result in the benefits expected.

3. Anticipated Announcement Award Date

Award notices to successful applicants will be sent out prior to the project start date.

The anticipated project period start date for this announcement is: 07/01/2023

VI. Award Administration Information

1. Award Notices

Successful applicants will receive an electronic Notice of Award. The Notice of Award is the authorizing document from the U.S. Administration for Community Living authorizing official, Office of Grants Management. Acceptance of this award is signified by the drawdown of funds from the Payment Management System. Unsuccessful applicants are generally notified within 30 days of the final funding decision and will receive a disapproval letter via e-mail. Unless indicated otherwise in this announcement, unsuccessful applications will not be retained by the agency and will be destroyed.

2. Administrative and National Policy Requirements

The award is subject to HHS Administrative Requirements, which can be found in 45 CFR Part 75 and the Standard Terms and Conditions, included in the Notice of Award as well as implemented through the HHS Grants Policy Statement.

Should you successfully compete for an award, recipients of federal financial assistance (FFA) from HHS will be required to complete an HHS Assurance of Compliance form (HHS 690) in which you agree, as a condition of receiving the grant, to administer your programs in compliance with federal civil rights laws that prohibit discrimination on the basis of race, color, national origin, age, sex and disability, and agreeing to comply with federal conscience laws, where applicable. This includes ensuring that entities take meaningful steps to provide meaningful access to persons with limited English proficiency; and ensuring effective communication with persons with disabilities. Where applicable, Title XI and Section 1557 prohibit discrimination on the basis of sexual orientation, and gender identity, The HHS Office for Civil Rights provides guidance on complying with civil rights laws enforced by HHS. See https://www.hhs.gov/civil-rights/for-providers/provider-obligations/index.html and https://www.hhs.gov/civil-rights/for-individuals/nondiscrimination/index.html.

A standard term and condition of award will be included in the final notice of award; all applicants will be subject to a term and condition that applies the terms of 48 CFR section 3.908 to the award and requires the grantees inform their employee in writing of employee whistleblower rights and protections under 41 U.S.C. 4712 in the predominant native language of the workforce.

Applicants may follow their own procurement policies and procedures when contracting with Project Funds, but You must comply with the requirements of 2 C.F.R. §§ 200.317-200.326. Additionally, when using Project Funds to procure supplies and/or equipment, applicants are encouraged to purchase American-manufactured goods to the maximum extent practicable. American-manufactured goods are those products for which the cost of their component parts that were mined, produced, or manufactured in the United States exceeds 50 percent of the total cost of all their components. For further guidance regarding what constitutes an American manufactured good (also known as a domestic end product), see 48 C.F.R. Part 25.

3. Reporting

Reporting frequency for performance and financial reports, as well as any required form or formatting and the means of submission will be noted within the terms and conditions on the Notice of Award.

4. FFATA and FSRS Reporting

The Federal Financial Accountability and Transparency Act (FFATA) requires data entry at the FFATA Subaward Reporting System (http://www.FSRS.gov) for all sub-awards and sub-contracts issued for $30,000 or more as well as addressing executive compensation for both grantee and sub-award organizations.

For further guidance please follow this link to access ACL's Terms and Conditions: https://www.acl.gov/grants/managing-grant#

VII. Agency Contacts

Project Officer

First Name:
Jeremy

Last Name:
Bell

Phone:
(202) 795-7374

Office:
Office of Elder Justice and Adult Protective Services

Grants Management Specialist

First Name:
Miles

Last Name:
Rather

Phone:
(202) 240-3165

Office:
Office of Grants Management

VIII. Other Information

Application Elements

• SF 424, required – Application for Federal Assistance (See "Instructions for Completing Required Forms" for assistance).

• SF 424A, required – Budget Information. (See Appendix for instructions).

• Separate Budget Narrative/Justification, required (See "Budget Narrative/Justification - Sample Format" for examples and "Budget Narrative/Justification – Sample Template.")

NOTE: Applicants requesting funding for multi-year grant projects are REQUIRED to provide a Narrative/Justification for each year of potential grant funding, as well as a combined multi-year detailed Budget Narrative/Justification.

• SF 424B – Assurance, required. Note: Be sure to complete this form according to instructions and have it signed and dated by the authorized representative (see item 18d on the SF 424).

• Lobbying Certification, required.

• Proof of non-profit status, if applicable

• Copy of the applicant's most recent indirect cost agreement or cost allocation plan, if requesting indirect costs. If any sub-contractors or sub-grantees are requesting indirect costs, copies of their indirect cost agreements must also be included with the application.

• Project Narrative with Work Plan, required (See "Project Work Plan – Sample Template" for a formatting suggestions).

• Vitae for Key Project Personnel.

• Letters of Commitment from Key Partners, if applicable.

The Paperwork Reduction Act of 1995 (P.L. 104-13)

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The project description and Budget Narrative/Justification is approved under OMB control number 0985-0018. Public reporting burden for this collection of information is estimated to average 10 hours per response, including the time for reviewing instructions, gathering and maintaining the data needed and reviewing the collection information.

Appendix

Accessibility Provisions for All Grant Application Packages and Funding Opportunity Announcements

Should you successfully compete for an award, recipients of federal financial assistance (FFA) from HHS will be required to complete an HHS Assurance of Compliance form (HHS 690) in which you agree, as a condition of receiving the grant, to administer your programs in compliance with federal civil rights laws that prohibit discrimination on the basis of race, color, national origin, age, sex and disability, and agreeing to comply with federal conscience laws, where applicable. This includes ensuring that entities take meaningful steps to provide meaningful access to persons with limited English proficiency; and ensuring effective communication with persons with disabilities. Where applicable, Title XI and Section 1557 prohibit discrimination on the basis of sexual orientation, and gender identity, The HHS Office for Civil Rights provides guidance on complying with civil rights laws enforced by HHS. See https://www.hhs.gov/civil-rights/for-providers/provider-obligations/index.html and https://www.hhs.gov/civil-rights/for-individuals/nondiscrimination/index.html.

- Recipients of FFA must ensure that their programs are accessible to persons with limited English proficiency. HHS provides guidance to recipients of FFA on meeting their legal obligation to take reasonable steps to provide meaningful access to their programs by persons with limited English proficiency. Please see https://www.hhs.gov/civil-rights/for-individuals/special-topics/limited-english-proficiency/fact-sheet-guidance/index.html and https://www.lep.gov. For further guidance on providing culturally and linguistically appropriate services, recipients should review the National Standards for Culturally and Linguistically Appropriate Services in Health and Health Care at https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=2&lvlid=53.

- Recipients of FFA also have specific legal obligations for serving qualified individuals with disabilities. Please see http://www.hhs.gov/ocr/civilrights/understanding/disability/index.html.
- HHS funded health and education programs must be administered in an environment free of sexual harassment. Please see https://www.hhs.gov/civil-rights/for-individuals/sex-discrimination/index.html; https://www2.ed.gov/about/offices/list/ocr/docs/shguide.html; and https://www.eeoc.gov/sexual-harassment.
- Recipients of FFA must also administer their programs in compliance with applicable federal religious nondiscrimination laws and applicable federal conscience protection and associated anti-discrimination laws. Collectively, these laws prohibit exclusion, adverse treatment, coercion, or other discrimination against persons or entities on the basis of their consciences, religious beliefs, or moral convictions. Please see https://www.hhs.gov/conscience/conscience-protections/index.html and https://www.hhs.gov/conscience/religious-freedom/index.html.

Please contact the HHS Office for Civil Rights for more information about obligations and prohibitions under federal civil rights laws at https://www.hhs.gov/ocr/about-us/contact-us/index.html or call 1-800-368-1019 or TDD 1-800-537-7697.

Instructions for Completing Required Forms

This section provides step-by-step instructions for completing the four (4) standard Federal forms required as part of your grant application, including special instructions for completing Standard Budget Forms 424 and 424A. Standard Forms 424 and 424A are used for a wide variety of Federal grant programs, and Federal agencies have the discretion to require some or all of the information on these forms. ACL does not require all the information on these Standard Forms. Accordingly, please use the instructions below in lieu of the standard instructions attached to SF 424 and 424A to complete these forms.

a. Standard Form 424

1. **Type of Submission:** (REQUIRED): Select one type of submission in accordance with agency instructions.

- Preapplication
- Application
- Changed/Corrected Application – If ACL requests, check if this submission is to change or correct a previously submitted application.

2. **Type of Application**: (REQUIRED) Select one type of application in accordance with agency instructions.

- New

- Continuation
- Revision

3. **Date Received:** Leave this field blank.

4. **Applicant Identifier**: Leave this field blank

5a **Federal Entity Identifier**: Leave this field blank

5b. **Federal Award Identifier**: For new applications leave blank. For a continuation or revision to an existing award, enter the previously assigned Federal award (grant) number.

6. **Date Received by State:** Leave this field blank.

7. **State Application Identifier:** Leave this field blank.

8. **Applicant Information**: Enter the following in accordance with agency instructions:

a. Legal Name: (REQUIRED): Enter the name that the organization has registered with the System for Award Management (SAM), formally the Central Contractor Registry. Information on registering with SAM may be obtained by visiting the Grants.gov website (https://www.grants.gov) or by going directly to the SAM website (www.sam.gov).

b. Employer/Taxpayer Number (EIN/TIN): (REQUIRED): Enter the Employer or Taxpayer Identification Number (EIN or TIN) as assigned by the Internal Revenue Service. In addition, we encourage the organization to include the correct suffix used to identify your organization in order to properly align access to the Payment Management System.

c. Organizational UEI (REQUIRED): If your entity is registered in SAM.gov today, your Unique Entity ID (SAM) has already been assigned and is viewable in SAM.gov. This includes inactive registrations. The Unique Entity ID is currently located below the DUNS Number on your entity registration record. Remember, you must be signed in to your SAM.gov account to view entity records.

d. Address: (REQUIRED) Enter the complete address including the county.

e. Organizational Unit: Enter the name of the primary organizational unit (and department or division, if applicable) that will undertake the project.

f. Name and contact information of person to be contacted on matters involving this application: Enter the name (First and last name required), organizational affiliation (if affiliated with an organization other than the applicant organization), telephone number (Required), fax number, and email address (Required) of the person to contact on matters related to this application.

9. **Type of Applicant:** (REQUIRED) Select the applicant organization “type” from the following drop down list.

A. State Government B. County Government C. City or Township Government D. Special District Government E. Regional Organization F. U.S. Territory or Possession G. Independent School District H. Public/State Controlled Institution of Higher Education I. Indian/Native American Tribal Government (Federally Recognized) J. Indian/Native American Tribal Government (Other than Federally Recognized) K. Indian/Native American Tribally Designated Organization L. Public/Indian Housing Authority M. Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education) N. Nonprofit without 501C3 IRS Status (Other than Institution of Higher Education) O. Private Institution of Higher Education P. Individual Q. For-Profit Organization (Other than Small Business) R. Small Business S. Hispanic-serving Institution T. Historically Black Colleges and Universities (HBCUs) U. Tribally Controlled Colleges and Universities (TCCUs) V. Alaska Native and Native Hawaiian Serving Institutions W. Non-domestic (non-US) Entity X. Other (specify)

10. **Name of Federal Agency**: (REQUIRED) Enter U.S. Administration for Community Living

11. **Catalog of Federal Domestic Assistance Number/Title:** The CFDA number can be found on page one of the Program Announcement.

12. **Funding Opportunity Number/Title:** (REQUIRED) The Funding Opportunity Number and title of the opportunity can be found on page one of the Program Announcement.

13. **Competition Identification Number/Title:** Leave this field blank.

14. **Areas Affected by Project:** List the largest political entity affected (cities, counties, state etc.)

15. **Descriptive Title of Applicant's Project:** (REQUIRED) Enter a brief descriptive title of the project (This is not a narrative description).

16. **Congressional Districts Of**: (REQUIRED) 16a. Enter the applicant's Congressional District, and 16b. Enter all district(s) affected by the program or project. Enter in the format: 2 characters State Abbreviation – 3 characters District Number, e.g., CA-005 for California 5th district, CA-012 for California 12th district, NC-103 for North Carolina's 103rd district. If all congressional districts in a state are affected, enter "all" for the district number, e.g., MD-all for all congressional districts in Maryland. If nationwide, i.e. all districts within all states are affected, enter US-all. See the below website to find your congressional district:

https://www.house.gov/

17. **Proposed Project Start and End Dates**: (REQUIRED) Enter the proposed start date and final end date of the project**. If you are applying for a multi-year grant, such as a 3 year grant project, the final project end date will be 3 years after the proposed start date.** In general, all start dates on the SF424 should be the 1st of the month and the end date of the last day of the month of the final year, for example 7/01/2014 to 6/30/2017. The Grants Officer can alter the start and end date at their discretion.

18. **Estimated Funding:** (REQUIRED) If requesting multi-year funding, enter the full amount requested from the Federal Government in line item 18.a., as a multi-year total. For example and illustrative purposes only, if year one is $100,000, year two is $100,000, and year three is $100,000, then the full amount of federal funds requested would be reflected as $300,000. The amount of matching funds is denoted by lines b. through f. with a combined federal and non-federal total entered on line g. Lines b. through f. represents contributions to the project by the applicant and by your partners during the total project period, broken down by each type of contributor. The value of in-kind contributions should be included on appropriate lines, as applicable.

NOTE: Applicants should review cost sharing or matching principles contained in Subpart C of 45 CFR Part 75 before completing Item 18 and the Budget Information Sections A, B and C noted below.

All budget information entered under item 18 should cover the total project period. For sub-item 18a, enter the federal funds being requested. Sub-items 18b-18e is considered matching funds. For ACL programs that have a cost-matching requirement (list here), the dollar amounts entered in sub-items 18b-18f must total at least 1/3 of the amount of federal funds being requested (the amount in 18a). For a full explanation of ACL's match requirements, see the information in the box below. For sub-item 18f (program income), enter only the amount, if any, that is going to be used as part of the required match. Program Income submitted as match will become a part of the award match and recipients will be held accountable to meet their share of project expenses even if program income is not generated during the award period.

There are two types of match: 1) non-federal cash and 2) non-federal in-kind. In general, costs borne by the applicant and cash contributions of any and all third parties involved in the project, including sub-grantees, contractors and consultants, are considered **matching funds**. Examples of **non-federal cash match** includes budgetary funds provided from the applicant agency's budget for costs associated with the project. Generally, most contributions from sub-contractors or sub-grantees (third parties) will be non-federal in-kind matching funds. Volunteered time and use of third party facilities to hold meetings or conduct project activities may be considered in-kind (third party) donations.

NOTE: **Indirect charges** may only be requested if: (1) the applicant has a current indirect cost rate agreement approved by the Department of Health and Human Services or another federal agency; or (2) the applicant is a state or local government agency. State governments should enter the amount of indirect costs determined in accordance with HHS requirements. **If indirect costs are to be included in the application, a copy of the approved indirect cost agreement or cost allocation plan must be included with the application. Further, if any sub-contractors or sub-grantees are requesting indirect costs, a copy of the latest approved indirect cost agreements must also be included with the application, or reference to an approved cost allocation plan.**

19. **Is Application Subject to Review by State Under Executive Order 12372 Process?** Please refer to IV. Application and Submission Information, 4. Intergovernmental Review to determine if the ACL program is subject to E.O. 12372 and respond accordingly.

20. **Is the Applicant Delinquent on any Federal Debt?** (Required) This question applies to the applicant organization, not the person who signs as the authorized representative. If yes, include an explanation on the continuation sheet.

21. **Authorized Representative**: (Required) To be signed and dated by the authorized representative of the applicant organization. Enter the name (First and last name required) title (Required), telephone number (Required), fax number, and email address (Required) of the person authorized to sign for the applicant. A copy of the governing body's authorization for you to sign this application as the official representative must be on file in the applicant's office.

(Certain federal agencies may require that this authorization be submitted as part of the application.)

Standard Form 424A

NOTE: Standard Form 424A is designed to accommodate applications for multiple grant programs; thus, for purposes of this ACL program, many of the budget item columns and rows are not applicable. You should only consider and respond to the budget items for which guidance is provided below. Unless otherwise indicated, the SF 424A should reflect a multi-year budget.

Section A - Budget Summary

Line 5: Leave columns (c) and (d) blank. Enter TOTAL Federal costs in column (e) and total non federal costs (including third party in-kind contributions and any program income to be used as part of the grantee match) in column (f). Enter the sum of columns (e) and (f) in column (g).

Section B - Budget Categories

Column 1: Enter the breakdown of how you plan to use the Federal funds being requested by object class category.

Column 2: Enter the breakdown of how you plan to use the non-Federal share by object class category.

Column 5: Enter the total funds required for the project (sum of Columns 1 and 2) by object class category.

Section C - Non-Federal Resources

Column A: Enter the federal grant program.

Column B: Enter in any non-federal resources that the applicant will contribute to the project.

Column C: Enter in any non-federal resources that the state will contribute to the project.

Column D: Enter in any non-federal resources that other sources will contribute to the project.

Column E: Enter the total non-federal resources for each program listed in column A.

Section D - Forecasted Cash Needs

Line 13: Enter Federal forecasted cash needs broken down by quarter for the first year only.

Line 14: Enter Non-Federal forecasted cash needs broken down by quarter for the first year.

Line 15: Enter total forecasted cash needs broken down by quarter for the first year.

Note: This area is not meant to be one whereby an applicant merely divides the requested funding by four and inserts that amount in each quarter but an area where thought is given as to how your estimated expenses will be incurred during each quarter. For example, if you have initial startup costs in the first quarter of your award reflect that in quarter one or you do not expect to have contracts awarded and funded until quarter three, reflect those costs in that quarter.

Section E – Budget Estimates of Federal Funds Needed for Balance of the Project (i.e. subsequent years 2, 3, 4 or 5 as applicable).

Column A: Enter the federal grant program

Column B (first): Enter the requested year two funding.

Column C (second): Enter the requested year three funding.

Column D (third): Enter the requested year four funding, if applicable.

Column E (forth): Enter the requested year five funding, if applicable.

Section F – Other Budget Information

Line 21: Enter the total Indirect Charges

Line 22: Enter the total Direct charges (calculation of indirect rate and direct charges).

Line 23: Enter any pertinent remarks related to the budget.

Separate Budget Narrative/Justification Requirement

Applicants requesting funding for multi-year grant programs are REQUIRED to provide a combined multi-year Budget Narrative/Justification, as well as a detailed Budget Narrative/Justification for each year of potential grant funding. A separate Budget Narrative/Justification is also REQUIRED for each potential year of grant funding requested.

For your use in developing and presenting your Budget Narrative/Justification, a sample format with examples and a blank sample template have been included in these Attachments. In your Budget Narrative/Justification, you should include a breakdown of the budgetary costs for all of the object class categories noted in Section B, across three columns: Federal; non-Federal cash; and non-Federal in-kind. Cost breakdowns, or justifications, are required for any cost of $1,000 or for the thresholds as established in the examples. The Budget Narratives/Justifications should fully explain and justify the costs in each of the major budget items for each of the object class categories, as described below. Non-Federal cash as well as, sub-contractor or sub-grantee (third party) in-kind contributions designated as match must be clearly identified and explained in the Budget Narrative/Justification The full Budget Narrative/Justification should be included in the application immediately following the SF 424 forms.

Line 6a: **Personnel**: Enter total costs of salaries and wages of applicant/grantee staff. Do not include the costs of consultants, which should be included under 6h Other.

In the Justification: Identify the project director, if known. Specify the key staff, their titles, and time commitments in the budget justification.

Line 6b: **Fringe Benefits**: Enter the total costs of fringe benefits unless treated as part of an approved indirect cost rate.

In the Justification: If the total fringe benefit rate exceeds 35% of Personnel costs, provide a breakdown of amounts and percentages that comprise fringe benefit costs, such as health insurance, FICA, retirement, etc. A percentage of 35% or less does not require a breakdown but you must show the percentage charged for each full/part time employee.

Line 6c: **Travel**: Enter total costs of all travel (local and non-local) for staff on the project. NEW: Local travel is considered under this cost item not under Other. Local transportation (all travel which does not require per diem is considered local travel). Do not enter costs for consultant's travel - this should be included in line 6h.

In the Justification: Include the total number of trips, number of travelers, destinations, purpose (e.g., attend conference), length of stay, subsistence allowances (per diem), and transportation costs (including mileage rates).

Line 6d: **Equipment**: Enter the total costs of all equipment to be acquired by the project. For all grantees, "equipment" is nonexpendable tangible personal property having a useful life of more than one year and an acquisition cost of $5,000 or more per unit. If the item does not meet the $5,000 threshold, include it in your budget under Supplies, line 6e.

In the Justification: Equipment to be purchased with federal funds must be justified as necessary for the conduct of the project. The equipment must be used for project-related functions. Further, the purchase of specific items of equipment should not be included in the submitted budget if those items of equipment, or a reasonable facsimile, are otherwise available to the applicant or its subgrantees.

Line 6e: **Supplies**: Enter the total costs of all tangible expendable personal property (supplies) other than those included on line 6d.

In the Justification: . For any grant award that has supply costs in excess of 5% of total direct costs (Federal or Non-Federal), you must provide a detailed break down of the supply items (e.g., 6% of $100,000 = $6,000 – breakdown of supplies needed). If the 5% is applied against $1 million total direct costs (5% x $1,000,000 = $50,000) a detailed breakdown of supplies is not needed. Please note: any supply costs of $5,000 or less regardless of total direct costs does not require a detailed budget breakdown (e.g., 5% x $100,000 = $5,000 – no breakdown needed).

Line 6f: **Contractual**: Regardless of the dollar value of any contract, you must follow your established policies and procedures for procurements and meet the minimum standards established in the Code of Federal Regulations (CFR's) mentioned below. Enter the total costs of all contracts, including (1) procurement contracts (except those which belong on other lines such as equipment, supplies, etc.). Note: The 33% provision has been removed and line item budget detail is not required as long as you meet the established procurement standards. Also include any awards to organizations for the provision of technical assistance. Do not include payments to individuals on this line. Please be advised: A subrecipient is involved in financial assistance activities by receiving a sub-award and a subcontractor is involved in procurement activities by receiving a sub-contract. Through the recipient, a subrecipient performs work to accomplish the public purpose authorized by law. Generally speaking, a sub-contractor does not seek to accomplish a public benefit and does not perform substantive work on the project. It is merely a vendor providing goods or services to directly benefit the recipient, for example procuring landscaping or janitorial services. In either case, you are encouraged to clearly describe the type of work that will be accomplished and type of relationship with the lower tiered entity whether it be labeled as a subaward or subcontract.

In the Justification: Provide the following three items – 1) Attach a list of contractors indicating the name of the organization; 2) the purpose of the contract; and 3) the estimated dollar amount. If the name of the contractor and estimated costs are not available or have not been negotiated, indicate when this information will be available. The Federal government reserves the right to request the final executed contracts at any time. If an individual contractual item is over the small purchase threshold, currently set at $100K in the CFR, you must certify that your procurement standards are in accordance with the policies and procedures as stated in 45 CFR Part 75 for states, in lieu of providing separate detailed budgets. This certification should be referenced in the justification and attached to the budget narrative.

Line 6g: **Construction**: Leave blank since construction is not an allowable costs for this program.

Line 6h: **Other**: Enter the total of all other costs. Such costs, where applicable, may include, but are not limited to: insurance, medical and dental costs (i.e. for project volunteers this is different from personnel fringe benefits), non-contractual fees and travel paid directly to individual consultants, postage, space and equipment rentals/lease, printing and publication, computer use, training and staff development costs (i.e. registration fees). If a cost does not clearly fit under another category, and it qualifies as an allowable cost, then rest assured this is where it belongs.

Note: A recent Government Accountability Office (GAO) report number 11-43, has raised considerable concerns about grantees and contractors charging the Federal government for additional meals outside of the standard allowance for travel subsistence known as per diem expenses. If meals are to be charged towards the grant they must meet the following criteria outlined in the Grants Policy Statement:

- *Meals are generally unallowable except for the following:*
- *For subjects and patients under study(usually a research program);*
- *Where specifically approved as part of the project or program activity, e.g., in programs providing children's services (e.g., Headstart);*
- *When an organization customarily provides meals to employees working beyond the normal workday, as a part of a formal compensation arrangement;*
- *As part of a per diem or subsistence allowance provided in conjunction with allowable travel; and*

- *Under a conference grant, when meals are a necessary and integral part of a conference, provided that meal costs are not duplicated in participants' per diem or subsistence allowances (Note: the sole purpose of the grant award is to hold a conference).*

  In the Justification: Provide a reasonable explanation for items in this category. For example, individual consultants explain the nature of services provided and the relation to activities in the work plan or indicate where it is described in the work plan. Describe the types of activities for staff development costs.

Line 6i: **Total Direct Charges**: Show the totals of Lines 6a through 6h.

Line 6j: **Indirect Charges**: Enter the total amount of indirect charges (costs), if any. If no indirect costs are requested, enter "none." Indirect charges may be requested if: (1) the applicant has a current indirect cost rate agreement approved by the Department of Health and Human Services or another federal agency; or (2) the applicant is a state or local government agency. **State governments should enter the amount of indirect costs determined in accordance with DHHS requirements.** An applicant that will charge indirect costs to the grant must enclose a copy of the current rate agreement. Indirect Costs can only be claimed on Federal funds, more specifically, they are to only be claimed on the Federal share of your direct costs. Any unused portion of the grantee's eligible Indirect Cost amount that are not claimed on the Federal share of direct charges can be claimed as un-reimbursed indirect charges, and that portion can be used towards meeting the recipient match.

Line 6k: **Total**: Enter the total amounts of Lines 6i and 6j.

Line 7: **Program Income**: As appropriate, include the estimated amount of income, if any, you expect to be generated from this project that you wish to designate as match (equal to the amount shown for Item 15(f) on Form 424). **Note:** Any program income indicated at the bottom of Section B and for item 15(f) on the face sheet of Form 424 will be included as part of non-Federal match and will be subject to the rules for documenting completion of this pledge. If program income is expected, but is not needed to achieve matching funds, **do not** include that portion here or on Item 15(f) of the Form 424 face sheet. Any anticipated program income that will not be applied as grantee match should be described in the Level of Effort section of the Program Narrative.

c. Standard Form 424B – Assurances (required)

This form contains assurances required of applicants under the discretionary funds programs administered by the Administration for Community Living. Please note that a duly authorized representative of the applicant organization must certify that the organization is in compliance with these assurances.

d. Certification Regarding Lobbying (required)

This form contains certifications that are required of the applicant organization regarding lobbying. Please note that a duly authorized representative of the applicant organization must attest to the applicant's compliance with these certifications.

Proof of Nonprofit Status (as applicable)

Non-profit applicants must submit proof of non-profit status. Any of the following constitutes acceptable proof of such status:

- A copy of a currently valid IRS tax exemption certificate.
- A statement from a State taxing body, State attorney general, or other appropriate State official certifying that the applicant organization has a non-profit status and that none of the net earnings accrue to any private shareholders or individuals.
- A certified copy of the organization's certificate of incorporation or similar document that clearly establishes non-profit status.

Indirect Cost Agreement

Applicants that have included indirect costs in their budgets must include a copy of the current indirect cost rate agreement approved by the Department of Health and Human Services or another federal agency. This is optional for applicants that have not included indirect costs in their budgets.

Budget Narrative/Justification- Sample Format

NOTE: Applicants requesting funding for a multi-year grant program are REQUIRED to provide a detailed Budget Narrative/Justification for EACH potential year of grant funding requested.

Object Class Category	**Federal Funds**	**Non-Federal Cash**	**Non-Federal In-Kind**	**TOTAL**	**Justification**
Personnel	$47,700	$23,55 4	$0	$71,254	**Federal** Project Director (name) = .5 FTE @ $95,401/yr = $47,700 **Non-Fed Cash** Officer Manager (name) = .5FTE @ $47,108/yr = $23,554

					Total 7 1,254
Fringe Benefits	$17,482	$8,632	$0	$26,114	**Federal** Fringe on Project Director at 36.65% = $17,482 FICA (7.65%) Health (25%) Dental (2%) Life (1%) Unemployment (1%) **Non-Fed Cash** Fringe on Office Manager at 36.65% = $8,632 FICA (7.65%) Health (25%) Dental (2%) Life (1%) Unemployment (1%)
Travel	$4,707	$2,940	$0	$7,647	**Federal** Local travel: 6 TA site visits for 1 person Mileage: 6RT @ .585 x 700 miles $2,457 Lodging: 15 days @ $110/day $1,650 Per Diem: 15 days @ $40/day $600 Total $4,707 **Non-Fed Cash** Travel to National Conference in (Destination) for 3 people Airfare 1 RT x 3 staff @ $500 $1,500 Lodging: 3 days x 3 staff @ $120/day $1,080

					Per Diem: 3 days x 3 staff @ $40/day $360 Total $2,940
Equipment	$10,000	$0	$0	$10,000	No Equipment requested OR: Call Center Equipment Installation = $5,000 Phones = $5,000 Total $10,000
Supplies	$3,700	$5,670	$0	$9,460	**Federal** 2 desks @ $1,500 $3,000 2 chairs @ $300 $600 2 cabinets @ $200 $400 **Non-Fed Cash** 2 Laptop computers $3,000 Printer cartridges @ $50/month $300 Consumable supplies (pens, paper, clips etc…) @ $180/month $ 2,160 Total $9,460
Contractual	$30,171	$0	$0	$30,171	(organization name, purpose of contract and estimated dollar amount) Contract with AAA to provide respite services:

					11 care givers @ $1,682 = $18,502 Volunteer Coordinator = $11,669 Total $30,171 *If contract details are unknown due to contract yet to be made provide same information listed above and:* A detailed evaluation plan and budget will be submitted by (date), when contract is made.
Other	$5,600	$0	$5,880	$11,480	**Federal** 2 consultants @ $100/hr for 24.5 hours each = $4,900 Printing 10,000 Brochures @ $.05 = $500 Local conference registration fee (name conference) = $200 Total $5,600 **In-Kind** **Volunteers** 15 volunteers @ $8/hr for 49 hours = $5,880
Indirect Charges	$20,934	$0	$0	$20,934	21.5% of salaries and fringe = $20,934 IDC rate is attached.
TOTAL	$140,294	$40,866	$5,880	$187,060	

Budget Narrative/Justification - Sample Template

NOTE: Applicants requesting funding for a multi-year grant program are REQUIRED to provide a detailed Budget Narrative/Justification for EACH potential year of grant funding requested.

Object Class Category	**Federal Funds**	**Non-Federal Cash**	**Non-Federal In-Kind**	**TOTAL**	**Justification**
Personnel					
Fringe Benefits					

Travel					
Equipment					
Supplies					
Contractual					
Other					
Indirect Charges					
TOTAL					

Project Work Plan - Sample Template

NOTE : Applicants requesting funding for a multi-year grant program are REQUIRED to provide a Project Work Plan for EACH potential year of grant funding requested.

Goal:

Measurable Outcome(s):

* Time Frame (Start/End Dates by Month in Project Cycle)

Major Objectives	Key Tasks	Lead Person	1*	2*	3*	4*	5*	6*	7*	8*	9*	10*	11*	12*
1.														
2.														
3.														
4.														
5.														
6.														

NOTE: Please do note infer from this sample format that your work plan must have 6 major objectives. If you need more pages, simply repeat this format on additional pages.

Instructions for Completing the Project Summary/ Abstract

- All applications for grant funding must include a Summary/Abstract that concisely describes the proposed project. It should be written for the general public.
- To ensure uniformity, limit the length to 265 words or less, on a single page with a font size of not less than 11, doubled-spaced.
- The abstract must include the project's goal(s), objectives, overall approach (including target population and significant partnerships), anticipated outcomes, products, and duration. The following are very simple descriptions of these terms, and a sample Compendium abstract.

Goal(s) - broad, overall purpose, usually in a mission statement, i.e. what you want to do, where you want to be.

Objective(s) - narrow, more specific, identifiable or measurable steps toward a goal. Part of the planning process or sequence (the "how") to attain the goal(s).

Outcomes - measurable results of a project. Positive benefits or negative changes, or measurable characteristics among those served through this funding (e.g., clients, consumers, systems, organizations, communities) that occur as a result of an organization's or program's activities. These should tie directly back to the stated goals of the funding as outlined in the funding opportunity announcement. (Outcomes are the end-point)

Products - materials, deliverables.

- A model abstract/summary is provided below:

The Delaware Division of Services for Aging and Adults with Physical Disabilities (DSAAPD), in **partnership** with the Delaware Lifespan Respite Care Network (DLRCN) and key stakeholders will, in the course of this two-year project, expand and maintain a statewide coordinated lifespan respite system that builds on the infrastructure currently in place.
The **goal** of this project is to improve the delivery and quality of respite services available to families across age and disability spectrums by expanding and coordinating existing respite systems in Delaware. The **objectives** are: 1) to improve lifespan respite infrastructure; 2) to improve the provision of information and awareness about respite service; 3) to streamline access to respite services through the Delaware ADRC; 4) to increase availability of respite services. Anticipated **outcomes** include: 1) families and caregivers of all ages and disabilities will have greater options for choosing a respite provider; 2) providers will demonstrate increased ability to provide specialized respite care; 3) families will have streamlined access to information and satisfaction with respite services; 4) respite care will be provided using a variety of existing funding sources and 5) a sustainability plan will be developed to support the project in the future. The expected **products** are marketing and outreach materials, caregiver training, respite worker training, a Respite Online searchable database, two new Caregiver Resource Centers (CRC), an

annual Respite Summit, a respite voucher program and 24/7 telephone information and referral services.

Instructions for Completing the "Supplemental Information for the SF-424" Form

1. Project Director.

Name, address, telephone and fax numbers, and e-mail address of the person to be contacted on matters involving this application. Items marked with an asterisk (*) are mandatory.

2. Novice Applicant. Select "Not Applicable To This Program."