

Fund for the Improvement of Postsecondary Education (FIPSE) Special Projects (84.116J)

Frequently Asked Questions (FAQs)

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Disclaimer: Please note the <u>Notice Inviting Applications (NIA)</u> in the Federal Register is the official application submission guide. These FAQs provide additional technical assistance only.

SECTION 1: OVERVIEW & ELIGIBILITY

1. What is the purpose of the FIPSE – SP program?

The purpose of the FIPSE – SP program is to provide grants to institutions of higher education (IHEs), combinations of such institutions, and other public and private nonprofit institutions and agencies, as the Secretary deems necessary, to support innovative projects concerning one or more areas of national need identified by the Secretary. This competition focuses on supporting four (4) areas of national need – 1) expanding the understanding and use of Artificial Intelligence (AI) technology in postsecondary education, 2) promoting civil discourse on college and university campuses, 3) promoting accreditation reform, and 4) supporting capacity-building for high-quality short-term programs.

In order to support these four (4) crucial needs, this competition includes seven (7) Absolute priorities under which applicants can apply: two (2) priorities dedicated to advancing the

understanding and use of AI in education (Absolute Priorities 1 and 2), one (1) priority dedicated to promoting civil discourse on college and university campuses (Absolute Priority 3), two (2) priorities promoting accreditation reform (Absolute Priorities 4 and 5), and two (2) priorities for capacity-building for high-quality short-term programs (Absolute Priority 6 and 7).

The competition also includes two (2) Competitive Preference Priorities in the area of promoting civil discourse on college and university campuses. The Department intends to award \$50 million to advance AI in Education, \$60 million to promote civil discourse on college and university campuses, \$7 million to support accreditation reform, and \$50 million to develop high-quality short-term programs.

2. What is the deadline to submit an application for the FY 2025 competition?

The deadline for the FY 2025 competition is 11:59:59 p.m. ET on December 3, 2025.

3. Who is eligible to apply? Are there limitations on eligible applicant submissions?

Institutions of higher education (as defined in <u>section 101 of the Higher Education Act of 1965</u>, as amended (HEA)), consortia of such institutions, and other public and private nonprofit institutions and agencies including State higher education agencies as defined in <u>20 U.S.C.</u> 1003(22).

The eligible entity may apply to all four (4) areas of national need as the lead applicant but must submit a separate grant application for each area of national need. The eligible entity may submit only one (1) grant application under an area of national need as the lead applicant. For areas of national need with more than one Absolute Priority, the applicant must select one of the two Absolute Priorities that will be addressed in the application narrative. We understand that a particular project may include elements that connect to both Absolute Priorities within an area of national need. Therefore, applicants are not precluded from incorporating elements from both Absolute Priorities

Please see the following table for additional clarification/guidance:

(1) Advancing the Understanding of and Use of Artificial Intelligence (AI) Technology in Postsecondary Education	AP1 and AP2	One application	AP 1: \$25 million AP 2: \$25 million	\$4 million for AP1 \$4 million for AP2
(2) Promoting Civil Discourse on College and University Campuses,	AP3 + CPP1 and CPP2	One application	AP 3: \$60 million	\$4 million max
(3) Promoting Accreditation Reform	AP4 and AP5	One application	AP 4: \$3.5 million AP 5: \$3.5 million	\$1 million for AP 4 \$1 million for AP 5
(4) Supporting Capacity-Building for High-Quality Short-Term Programs.	AP6 and AP7	One application	AP 6: \$25 million AP 7: \$25 million	\$4 million for AP6 \$4 million for AP7

4. What are the definitions for the entities listed in the eligibility section?

As noted in the NIA, the following entities are defined accordingly:

- a. Institution of Higher Education (IHE) as defined in section 101 of HEA.
- b. Other public and private nonprofit institutions and agencies and State Higher Education Agency (SHEA) as defined in 20 U.S.C. 1003(22).
 - i. State higher education agency means the officer or agency primarily responsible for the State supervision of higher education.
 - ii. The term "nonprofit" as applied to a school, agency, organization, or institution means a school, agency, organization, or institution owned and operated by one or more nonprofit corporations or associations, no part of the net earnings of which inures, or may lawfully inure, to the benefit of any private shareholder or individual.

5. For nonprofit institutions and agencies, what do they have to include in their application to demonstrate eligibility?

An applicant that is a nonprofit organization may, under <u>34 CFR 75.51</u>, demonstrate its nonprofit status by providing:

- a. Proof that the Internal Revenue Service currently recognizes the applicant as an organization to which contributions are tax deductible under section 501(c)(3) of the Internal Revenue Code.
- b. A statement from a state taxing body or the State attorney general certifying that the organization is a nonprofit organization operating within the State and that no part of its net earnings may lawfully benefit any private shareholder or individual.
- c. A certified copy of the applicant's certificate of incorporation or similar document if it clearly establishes the nonprofit status of the applicant; or
- d. Any item described above if that item applies to a State or national parent organization, together with a statement by the State or parent organization that the applicant is a local nonprofit affiliate.

6. How should we demonstrate the type of entity of a lead applicant and/or partner institution/organization as it applies to the eligibility criteria?

Applicants should provide ample documentation regarding their entity type. For example, an applicant that is a nonprofit organization may, under <u>34 CFR 75.51</u>, demonstrate its nonprofit status by providing:

- (1) proof that the Internal Revenue Service currently recognizes the applicant as an organization to which contributions are tax deductible under section 501(c)(3) of the Internal Revenue Code;
- (2) a statement from a State taxing body or the State attorney general certifying that the organization is a nonprofit organization operating within the State and that no part of its net earnings may lawfully benefit any private shareholder or individual;
- (3) a certified copy of the applicant's certificate of incorporation or similar document if it clearly establishes the nonprofit status of the applicant; or
- (4) any item described above if that item applies to a State or national parent organization, together with a statement by the State or parent organization that the applicant is a local nonprofit affiliate.

Note: If it is not clear that an applicant meets the eligibility criteria, the application may be flagged as ineligible.

7. Can an institution/ organization submit multiple applications? If we submit an application as the lead applicant, can we also be a partner/subgrantee on another application?

Yes. An eligible entity may submit an application to each of the four (4) areas of national need as the lead applicant. However, an eligible entity may submit only one (1) grant application under an area of national need as the lead applicant (and must clearly identify which absolute priority the application is addressing). An entity can be included as a partner in multiple applications.

8. Can an institution apply to partner with a for-profit organization?

No. Under <u>34 CFR 75.127</u>, only eligible parties may apply in partnership under a particular competition. Because for-profit organizations are <u>not</u> eligible entities under <u>20 U.S.C. § 1138 (a)</u>, institutions may not apply to partner with them.

9. Are K-12 public school districts eligible to apply for funding under the current FIPSE-SP program, or to participate as lead applicants in partnership with higher education institutions?

Yes, as long as the applicant demonstrates it meets the eligibility requirements for "public or private nonprofit institutions or agencies".

10. Can system offices apply on behalf of their institutions? For example, could the "State Board of Community and Technical Colleges," an administrative body representing 20 community and technical colleges be eligible to lead a project?

If the system is a State higher education agency, then they could serve as the lead applicant. If the system is not a State higher education agency, then one of their eligible IHEs should be designated as the lead applicant.

11. Can a university or college system (and all the affiliated colleges in the system) be considered a single IHE?

If the system is a State higher education agency, then they could serve as the lead applicant. If the system is not a State higher education agency but rather is a group of multiple affiliated colleges and universities that are managed by a single governing body, such as a board of regents or trustees, then one of their eligible IHEs should be designated as the lead applicant.

SECTION 2: ABSOLUTE & COMPETITIVE PREFERENCE PRIORITIES

12. What are the funding priorities of the FY 2025 competition?

The notice contains seven (7) Absolute priorities under which applicants can apply, and are outlined below. Additionally, within Absolute Priority 3 there are two (2) Competitive Preference Priorities (CPPs). Under 34 CFR 75.105(c)(2)(i), we will award an additional ten (10) points to an application that meets each of these Competitive Preference Priorities. Applicants may receive Competitive Preference Priority points for both CPP 1 and CPP 2. The Priorities are as follows:

(1) Advancing the Understanding and Use of Artificial Intelligence (AI) in Education

- a. Absolute Priority 1: Advancing Artificial Intelligence to Improve Educational Outcomes of Postsecondary Students
- b. Absolute Priority 2: Ensuring Future Educators and Students Have Foundational Exposure to AI and Computer Science

(2) Promoting Civil Discourse on College and University Campuses

- a. Absolute Priority 3: Promoting Civil Discourse on College and University Campuses
 - i. Competitive Preference Priority 1 (0 or 10 points): Civic Institutes at Institutions of Higher Education
 - ii. Competitive Preference Priority 2 (0 or 10 points): Non-IHE Nonprofit Organizations That Educate Students to Promote Freedom and Engage in Civil Discourse

(3) Promoting Accreditation Reform

- a. Absolute Priority 4: Supporting Institutions in Changing Accrediting Agencies
- b. Absolute Priority 5: Supporting the Creation of New Accrediting Agencies

(4) Capacity-Building for High-Quality Short-Term Programs

- a. Absolute Priority 6: Creation of New High-Quality Short-Term Programs
- b. Absolute Priority 7: Expansion of Existing High-Quality Short-Term Programs

13. What is the difference between Absolute and Competitive Preference Priorities?

In order to be considered for funding, each application must address one (1) of the Absolute Priorities under an area of national need. An applicant can choose whether or not to address a Competitive Preference Priority.

For the Competitive Preference Priorities (CPPs) under Absolute Priority 3 (Promoting Civil Discourse on College and University Campuses), applications that successfully address one or both CPPs may receive an additional ten (10) points for each of these Competitive Preference Priorities. Applicants may receive Competitive Preference Priority points for both CPP 1 and CPP 2. Please refer to the Notice Inviting Applications (NIA) for more details.

14. Must an institution/ organization meet both Absolute and Competitive Preference Priorities?

While Competitive Preference Priorities are optional to respond to, only applications that address one (1) of the Absolute priorities will be considered for funding.

15. Are the Absolute and Competitive Preference Priorities included as part of the recommended page limit?

Yes. The recommended page limit is 35 pages. Responses to the Absolute Priorities and Competitive Preference Priorities, if applicable, should be included in this section.

Responses to the Competitive Preference Priorities under Absolute Priority 3 should be clearly marked as Competitive Preference Priority 1 and/or Competitive Preference Priority 2.

16. If one selected Absolute Priority 1, are they able to select either (a) or (b) under this priority? If yes, if they select (b) are they required to address (I), (ii), and (iii) or can they simply focus on (b) (ii) (iii)

Yes, an applicant applying under Absolute Priority 1 may opt to address 1(a) only, 1(b) only, or both. For priorities that state "one or more of the following," and include subparts, you must address at least one of the subparts, but you may also opt to address a combination of them or all of them.

17. We see under Absolute Priority 1 that language requests "projects or proposals to improve academic instruction and student learning, including efforts designed to assess learning gains made by postsecondary students."

Then, section b describes how projects can partner with state or local education agencies. Does this mean a project focused on middle school students and their teachers would qualify for this call? If so, do we need to specify how improving middle school literacy is related to later postsecondary success?

AP1 must include efforts designed to assess the learning gains made by postsecondary students, but a proposal does not need to be only focused on postsecondary students. It is the applicant's responsibility to adequately address how their project will meet the absolute priority through its services, activities, and target audience.

18. Can an applicant address Absolute Priority 2 by partnering with a school instead of a LEA or SEA?

An application under Absolute Priority 2 must "leverage AI to improve teacher preparation by doing one of subparts (a) through (g). While the language in subpart or more of the following that addresses subparts (f) and (g) explicitly mention LEAs/SEAs, not an individual school, a proposed project that includes a partnership with a single school could still meet the requirements of Absolute Priority 2 by addressing one or more of the other subparts.

19. Would a focus on developing and delivering a Master of Science program in Computer Science be considered an appropriate response to Absolute Priority 2 (a)?

Under Absolute Priority 2(a), an applicant may propose a project that leads to an AI and computer science credential in rural communities. Credentials can include master or professional degrees.

20. In Absolute Priority 2(a), it notes "Deliver AI and computer science credentials in rural communities". How is rural community defined in this competition?

This competition does not include a definition for "rural community"; therefore, applicants have flexibility to define "rural community" in their application. Applicants should clearly demonstrate how they are defining "rural community" and the target population to be served, specifically as it relates to Absolute Priority 2 – Ensuring Future Educators and Students Have Foundational Exposure to AI and Computer Science.

Note: For assistance with identifying rural communities, applicants may retrieve locale codes from the following NCES search tools. This is included as a resource to assist applicants; however, it is **not required** for applicants to provide the NCES locale codes in order to meet the requirements of Absolute Priority 2.

- **a.** NCES School District search tool (https://nces.ed.gov/ccd/districtsearch/), where LEAs can be looked up individually to retrieve locale codes
- **b.** Public School search tool (https://nces.ed.gov/ccd/schoolsearch/), where individual schools can be looked up to retrieve locale codes.
- **c.** NCES College Navigator search tool (https://nces.ed.gov/collegenavigator/), where IHEs can be looked up individually to determine the campus setting.

21. In Absolute Priority 3, how are "civil discourse", "freedom", "civic thought", "constitutional studies", "American history", and "economic liberty" defined?

These terms are not defined in the <u>NIA</u>. However, the Department encourages applicants to refer to the text of the absolute priority and the background section for additional guidance on the types of projects the Department is seeking to support.

22. In Absolute Priority 3, what does the term "academic unit" mean?

This term means: (1) colleges, schools, and departments of civics, history, ethics, government, etc. at universities and colleges; (2) independent centers or offices at colleges and universities primarily focused on those topics; and (3) social studies, history, government programs, etc. within a university's school, college, or department of education."

23. In Competitive Preference Priority 1 (CPP 1) in Absolute Priority 3, how can an applicant show that independent academic units "demonstrate a sustained commitment to robust civil discourse, the liberal arts, and the study of American history and politics through primary documents"?

An applicant may provide this evidence through the IHE's offerings in degree programs (including interdisciplinary degrees with related departments), courses addressing relevant content areas, research and expertise of related faculty, and educational and research events (seminars, symposia, workshops, etc.) pertaining to the relevant areas of the priorities.

24. In Competitive Preference Priority 2 (CPP 2) in Absolute Priority 3, can the non-IHE nonprofit organization be part of the lead applicant's IHE?

No, the non-IHE nonprofit organization must be independent of the IHE.

Note: As a reminder, to meet the requirements of CPP 2 non-IHE nonprofit organizations are private nonprofit organizations that do not meet the HEA definition of an institution of higher education and that educate students to promote freedom and engage in civil discourse. Furthermore, these entities must demonstrate experience working with higher education institutions on matters of civil discourse.

25. In CPP 2 in Absolute Priority 3, how can an applicant show that a non-IHE nonprofit organization has "demonstrate[d] experience working with higher education institutions on matters of civil discourse"?

A non-profit organization may provide to the applicant evidence of "demonstrated experience" by providing documentation related to services, events, and products provided to or in partnership with college and universities relative to the exchange of information or debate of ideas on matters related to the public good or civic governance.

26. For Absolute Priority 4, can IHEs propose projects to change or add accrediting agencies that are not yet recognized by the Department?

Absolute Priority 4 and the <u>NIA</u> do not define or limit the term 'accrediting agency' to a 'nationally recognized accrediting agency' as otherwise defined under <u>34 CFR 600.2</u>. Because this term is undefined, the Department will accept projects under Absolute Priority 4 that propose to change or add accrediting agencies that are not yet recognized by the Department.

Note: Adding or changing accrediting agencies may impact institutional eligibility under Title IV and recommends that institutions of higher education contact <u>aslrecordsmanager@ed.gov</u> for questions of institutional eligibility.

27. What are the requirements/process for notifying the Department if an applicant proposes changing accrediting agencies?

Please review the "Changes to the Approval Process for Changing Accrediting Agencies" in the Dear Colleague Letter published on May 1, 2025: https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2025-04-30/changes-approval-process-changing-accrediting-agencies.

For additional questions about the Dear Colleague Letter, please email us at FIPSE-SP@ed.gov.

28. In terms of Absolute Priority 5, Supporting the Creation of New Accrediting Agencies, is it correct that new programmatic accreditors are eligible to apply, in addition to new institutional accrediting agencies?

Yes, new programmatic accreditors are eligible to apply as long as the lead applicant meets the eligibility criteria for this competition:

- Institutions of higher education (as defined in <u>section 101 of the HEA</u>),
- Consortia of such institutions
- Other public and private nonprofit institutions and agencies including State higher education agencies as defined in 20 U.S.C. 1003(22).

29. Is it possible to focus the grant on specific job sectors in Absolute Priority 6 and 7 (National Need Area #4)?

Yes, it is possible to focus the project on specific job sectors, assuming they meet and align with the definition of high-quality, short-term programs as defined by the One Big Beautiful Bill Act (OBBBA) and are in-demand industry sectors as defined by Workforce Innovation and Opportunity Act (WIOA).

Note: High-quality, short-terms programs as defined in the eligibility requirements in the Workforce Pell Grants program in Section 83002(b) of the OBBBA, including program length requirements and alignment with high-skill, high-wage, or in-demand industry sectors or occupations.

Note: In-demand industry sectors or occupations, as defined in section 3(23) of the WIOA, means (i) an industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, or local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors; or (ii) an occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy, as appropriate.

30. In Absolute Priority 6 and 7, what are the program eligibility requirements for Workforce Pell Grants in the One Big Beautiful Bill Act (OBBBA)?

Section 83002(b) of the OBBBA lists the program eligibility requirements for Workforce Pell Grants. The text of the bill is located here: https://www.congress.gov/bill/119th-congress/house-bill/1/text.

According to Section 832002 (b), an eligible Workforce Pell Grant program is a program that must be at least 150 clock hours of instruction, but less than 600 clock hours of instruction (or an equivalent number of credit hours), offered during a minimum of eight weeks but less than 15 weeks, and is not offered as a correspondence course. In addition, an eligible program must be approved by the State Governor in accordance with the requirements in Section 83002(b)(2)(iii) of the OBBBA.

31. Who qualifies as an eligible student for a Workforce Pell Grant under OBBBA?

To meet basic eligibility for a Workforce Pell Grant under OBBBA, a student must:

- Meet normal Pell eligibility (e.g., financial need, undergrad level).
- Be enrolled in an eligible workforce program—short-term, non-degree, accredited.

• Not simultaneously receiving a traditional Pell Grant or a TEACH Grant.

The Department will provide active communication and technical assistance for grantees selected funding under this program, to ensure that such grantees are made aware of any updates to Workforce Pell Grant student eligibility as a result of negotiated rulemaking.

SECTION 3: FUNDING

32. Are the stated dollar amounts for each award in the <u>NIA</u> under "II. Award Information" the estimated and maximum amounts per year or for the entire project period?

The estimated and maximum award amounts listed under Section "II. Award Information" of the <u>NIA</u> corresponds to the entire 48-month project period.

33. May an applicant request less than the average award size?

Yes.

34. What is the performance period for this grant?

Up to 48 months.

SECTION 4: SUBAWARDS & PARTNERS

35. Are subgrants allowable?

Yes, a grantee may award subgrants--to directly carry out project activities--to the following types of entities listed in their grant application: IHEs and public and private nonprofit institutions and agencies including State higher education agencies as defined in <u>20 U.S.C.</u> 1003(22).

Yes, a grantee may award subgrants to directly carry out project activities <u>ONLY</u> to eligible entities. Please see the eligibility portion of the <u>NIA</u> or FAQ #3 for this list.

36. Do the subgrantees need to be the same entity type as the lead applicant?

No, subgrantees do not need to be the same entity type as the lead applicant. Under <u>34 CFR</u> <u>75.708(b)</u> and <u>(c)</u>, a grantee under this competition may award subgrants to directly carry out project activities described in its application to the following types of entities: IHEs and public

and private nonprofit institutions and agencies including State higher education agencies as defined in 20 U.S.C. 1003(22).

Note: If a subgrantee is a nonprofit organization they must demonstrate its nonprofit status according to the requirements in the eligibility criteria.

37. Are private, for-profit organizations allowed to be a subgrantee? Alternatively, can a private, for-profit organization receive funding as a contractor/consultant as a direct cost line item under our award?

No. A lead applicant can only provide subgrants to eligible entities as explained in the <u>NIA</u> and FAQ #3. Under <u>34 CFR 75.708(b)</u> and (c), a grantee under this competition may award subgrants to directly carry out project activities described in its application to the following types of entities: IHEs and public and private nonprofit institutions and agencies including State higher education agencies as defined in 20 U.S.C. 1003(22).

Yes, you may contract with a private, for-profit organization for the purpose of obtaining goods and services for the recipient's use and creates a procurement relationship with a contractor.

38. If an applicant proposes subawards, where in the application should they include the subaward budget?

The budgeted amount for a subaward will go in the "Contractual" line item of the lead applicant's ED-524 Budget Summary Form. The specific details of each subaward must be provided in a separate, detailed budget narrative for each year of the project period.

39. Does the 8% indirect cost rate apply to subgrants as well?

Yes. Subawardees, must comply with the administrative requirements of the award, including the indirect cost rate limitations outlined in <u>2 CFR 200.332 Requirements for pass-through entities</u>, particularly the requirements for pass-through entities. This includes Indirect Cost Rate Identification as per <u>2 CFR 200.332(b)(1)(xiv)</u> and the review and approval process for indirect cost rates specified in <u>2 CFR 200.332(b)(4)</u>.

If a subrecipient has an indirect cost rate that exceeds 8% of Modified Total Direct Costs, their rate must be capped at 8% of Modified Total Direct Costs like the awardee (passthrough entity).

40. Are letters of support for partners required? What about for subawards?

Applicants are strongly advised to provide support or commitment letters to facilitate the evaluation of a partner's contribution, the relationship between entities, and to confirm the need

for the project. As noted in the application package, an applicant should provide a formal, signed letter of commitment from each partner institution/organization. Commitment letters should briefly describe what services and resources partners will be contributing to the project. Letters should be submitted on official organizational letterhead.

Please list each partner entity referenced in the abstract, as well as the type of institution/organization (i.e., institution of higher education (IHE), nonprofit organization, local education agency (LEA), state education agency (SEA), etc.) in the letter.

Applicants that intend to enter into subawards, as noted in the <u>NIA</u>, must identify within their application those entities to which it intends to subaward, and a description of the proposed subaward activities. While letters of support may be helpful in describing the activities of the subaward, they are not required under the <u>NIA</u>.

41. Where should an applicant include CVs and Letters of Commitment for subawards?

Applicants should include these attachments in the "Other Attachments" form. All attachments must be uploaded as a PDF.

42. If an organization is not formally listed as a partner in the application, may awarded funds still be used later by the grantee to purchase or contract for that company's platform or services? If so, does this apply at the university level, the K–12 partner level, or both?

Applicants must clearly identify all contractors and subawardees in the Project Narrative and the Budget Narrative. The justification should include services to be performed and products to be provided, along with the corresponding costs. Please review <u>Appendix 2 – Contract Provisions for Non-Federal Entity Contracts Under Federal Awards under the Uniform Guidance (2 CFR 200)</u>, §200.308, §200.318-322, §200.327 (Contract Provisions), and <u>EDGAR 74.42</u>.

The requirement applies to all contractors and subawardees.

43. How should the flow of funds be structured (e.g., paid directly by the IHE, through a subcontract, through a district partner, etc.)?

Review the above-referenced regulations in FAQ #42 regarding contracting requirements with respect to structuring the flow of funds.

SECTION 5: APPLICATION LOGISTICS

44. What should be included in the abstract?

The abstract should serve as a quick reference guide to your application. Include the items below in the order listed and use the same number format. To complete the information accurately, you will need to provide the following details:

- 1. Lead Applicant Institution: Name the institution that is the primary applicant.
- 2. **Partner Entities:** List partner entities involved in the project, mentioning their type (e.g., institution of higher education (IHE), nonprofit organization, local education agency (LEA), state education agency (SEA), etc.).
- 3. **Project Title:** Provide the title of the project.
- 4. **Area of National Need:** Specify which national need the application addresses.
- 5. **Absolute Priority Addressed:** Identify the Absolute Priority addressed by number (e.g., Absolute Priority 3) and briefly describe how it is are addressed.
- 6. **Competitive Preference Priority/ies Addressed:** If applicable under Absolute Priority 3, identify the Competitive Preference Priority/ies addressed by number (e.g., CPP 1 and/or CPP 2) and briefly describe how it is/they are addressed.
- 7. **Target Population:** Define the target population (e.g., faculty, staff, students, etc.).
- 8. **Proposed Activities:** Outline the activities proposed in the project.
- 9. **Anticipated Results:** Describe the anticipated results, such as learning outcomes.

Please ensure all relevant information is included for a comprehensive application.

45. How should we format our project narrative?

Before preparing the Project Narrative, applicants should review the program statute, program regulations, <u>Common Instructions</u>, and the <u>Federal Register Notice Inviting Applications</u> for specific guidance and requirements. Additional guidance can be found in the application booklet, and the pre-application technical assistance webinar.

The Secretary evaluates an application according to the program specific criteria in <u>34 CFR</u> <u>75.210</u>. The Project Narrative is where the applicant provides detailed responses to each selection criterion, as the project pertains to the area of national need and Absolute Priority or Priorities the applicant is responding to, and if applicable, the responses to one or both of the Competitive Preference Priorities in Absolute Priority 3.

Applicants should respond to the selection in the same order as presented in the <u>NIA</u> when developing the Project Narrative. The Project Narrative should be written in a concise and clear manner and be consecutively ordered as reflected in the <u>NIA</u>. Clearly label each selection criteria and separately address each of the criterion.

46. Does everything have to be double-spaced and 12-point font?

Yes. For all formatting requirements, please read the Common Instructions published in the Federal Register on August 29, 2025 (90 FR 42234), and available at https://www.federalregister.gov/documents/2025/08/29/2025-16571/common-instructions-and-information-for-applicants-to-department-of-education-discretionary-grant.

47. Is it acceptable to use the landscape orientation for the tables that address the design, management plan, and evaluation plan?

Yes.

48. Are references included in the 35-page limit?

The recommended 35-page limit applies only to the application narrative (responses to the priorities and the Selection Criteria) and does not apply to the cover sheet and Table of Contents, the budget section, including the narrative budget justification, the assurances and certifications, or the one-page abstract, the resumes, the bibliography, the letters of support, or other appendices.

49. Should the SF424 and the ED 524 Budget Summary Form (and accompanying budget narrative) indicate the total amount requested over the 48 months as a single budget period?

Yes. Additionally, the ED 524 Budget Summary Form should include a budget breakdown for each year of the 48-month project period.

50. What do I need to submit in the budget section?

Applicants should upload a detailed supporting Budget Narrative explaining the proposed costs for each year of the performance period. Total costs per year should align with the costs stated on the ED-524 Budget Form. Include the level of effort (time commitment) per year for key personnel. You must upload the supporting narrative in .pdf format.

Note:

• Applicants are required to prepare a detailed and comprehensive Budget Narrative for all proposed line items listed in the ED 524 Budget Form (Sections A and B). This narrative should be attached as the "Budget Narrative Attachment Form."

- The detailed Budget Narrative is for each year of the budget over the 4-year performance period.
- Refer to "Instructions for ED 524 Budget Summary Form, Section C" for additional instructions on the Budget Narrative.

51. What is the indirect cost rate for this grant?

This program has established a restricted indirect cost rate of 8%. For more information regarding indirect costs, or to obtain a negotiated indirect cost rate, please see https://www.ed.gov/about/ed-offices/ofo#indirect-cost-division.

Additional Reference Regulations for Indirect Costs:

- a. Uniform Guidance (2 CFR 200)
 - i. 2 CFR 200 Subpart E Cost Principles
 - ii. 2 CFR 200.414 Indirect Costs
 - iii. <u>Appendix III to Part 200</u> Indirect (F&A) Costs Identification and Assignment, and Rate Determination for Institutions of Higher Education (IHEs)
 - iv. <u>Appendix IV to Part 200</u> Indirect (F&A) Costs Identification and Assignment, and Rate Determination for Nonprofit Organizations
 - v. <u>Appendix VII to Part 200</u> State and Local Government and Indian Tribe Indirect Cost Proposals
- b. Education Department General Administrative Regulations (EDGAR)
 - i. <u>34 CFR 75.560 75.580</u> Indirect Cost Rates

Note: Please send any questions concerning indirect costs to the following mailbox: IndirectCostDivision@ed.gov.

52. Is there a matching requirement for this program?

No.

53. When will applicants be notified of whether they will be awarded a grant?

The Department's Office of Legislation and Congressional Affairs will inform the Congress regarding applications approved for new program grants.

Successful applicants will receive award notices by mail or e-mail shortly after the Congress is notified. No funding information will be released before the Congress is notified.

Unsuccessful applicants will be notified in writing following the notice to successful applicants.

54. When are grantees projected to begin grant activities?

Grants should be ready to immediately begin grant activities following the grant start date, which will be located on the Grant Award Notification (GAN) in Box 6. We anticipate a grant start date of January 1, 2026.

SECTION 6: EVALUATION & PERFORMANCE REPORTING

55. What are the performance measures that the applicant must propose and report on?

For the purpose of Department reporting under <u>34 CFR 75.110</u>, the Department has established a set of performance measures for this competition:

Project-Specific Performance Measures: Applicants must propose project-specific performance measures and performance targets (both as defined in this notice) consistent with the objectives of the proposed project. Applications must provide the following information as directed under 34 CFR 75.110(b) and (c):

- **a. Project-specific performance measures:** How each proposed project-specific performance measure would accurately measure the performance of the project; be consistent with the program performance measures established under this notice; and be used to inform continuous improvement of the project.
- **b. Baseline (as defined in the notice) data:** (i) Why each proposed baseline is valid and reliable, including an assessment of the quality data used to establish the baseline; or (ii) if the applicant has determined that there are no established baseline data for a particular performance measure, an explanation of why there is no established baseline and of how and when, during the project period, the applicant would establish a valid baseline for the performance measure.
- **c. Performance targets:** Why each proposed performance target is ambitious yet achievable compared to the baseline for the performance measure and when, during the project period, the applicant would meet the performance target(s).

56. What reporting requirements are there for this program?

All grantees must submit an Annual Performance Report (APR) with information that is responsive to these performance measures.

If you apply for a grant under this competition, you must ensure that you have in place the necessary processes and systems to comply with the reporting requirements in 2 CFR part 170

should you receive funding under the competition. See the standards in <u>2 CFR 170.105</u> to determine whether you are covered by <u>2 CFR part 170</u>.

At the end of your project period, you must submit a Final Performance Report (FPR), including financial information, as directed by the Secretary. If you receive a multiyear award, you must submit an APR that provides the most current performance and financial expenditure information as directed by the Secretary under 34 CFR 75.118. The Secretary may also require more frequent performance reports under 34 CFR 75.720(c). For specific requirements on reporting, please go to www.ed.gov/fund/grant/apply/appforms/appforms.html.

57. Is an external evaluator a requirement?

No, you may work with either an internal or external evaluator. You should select an evaluator that works best based on your project's needs and evaluation design.

SECTION 7: ALLOWABLE COSTS & ACTIVITIES

58. Are costs related to AI platform licensing, curriculum development, teacher training, and AI literacy micro credentials allowable under this grant?

Yes, these costs are allowable and should be clearly justified in the Budget Narrative and aligned with the goals and objectives of the project in response to the requirements of AP1 or AP2.

59. Can project funds be used to scale or enhance existing AI tools/platforms, or must all technology be newly developed as part of the project?

Project funds may be used to scale existing AI tools or develop new tools in alignment with the requirements of AP 1 or AP2 and according to the needs of the educational institution as demonstrated in the application narrative.

60. Are scholarships and direct student aid an allowable cost?

No.

61. Are student vouchers for buss pass, groceries, childcare, housing, or other use an allowable cost?

No.

62. Can the evaluator be paid using grant funds? Is there a suggested budget amount for evaluation in the grant?

Yes, evaluators can be paid using grant funds.

No, there is no requirement regarding the minimum or maximum amount of grants funds that can be budgeted for evaluation purposes.

63. Is construction, remodeling, and/or broadband infrastructure an allowable activity/cost under this program?

No, this program does not include any infrastructure projects or activities as allowable activities/costs and, therefore, is not subject to the BABAA domestic sourcing requirements. No grantee may use its grant for acquisition of real property or for construction unless specifically permitted by the applicable statutes and regulations.

However, minor remodeling/renovations are an allowable activity/cost. Minor remodeling means minor alterations in a previously completed building. The term also includes the extension of utility lines, such as water and electricity, from points beyond the confines of the space in which the minor remodeling is undertaken but within the confines of the previously completed building. The term does not include building construction, structural alterations to buildings, building maintenance, or repairs.

64. Additional allowable costs and activities

This is not a comprehensive list of allowable costs or activities. For additional guidance on allowable costs, please review <u>2 CFR Subpart E</u> (Cost Principles) and contact <u>FIPSE-SP@ed.gov</u> with additional questions.

- a. Student stipends for internships and apprenticeships (Please refer also to "Participant Support Costs" below.
- b. Salary and benefits for program staff.
 - i. Please refer to the personnel compensation and benefits regulations in 2 CFR 200.430-431 for additional guidance.
- c. Supplemental salary or stipends for existing employees of an institution to increase their paid hours (e.g. When employees may be otherwise 9- or 10-month employees).
 - Please ensure it is aligned with your institution's policies and procedures for extra pay. Refer to <u>2 CFR 200.430</u> for additional guidance on compensation of personnel services, including standards for documentation of personnel expenses and extra pay.

- d. Staff and student travel
 - Please consult with your Program Specialist for additional guidance.
 Please ensure it is aligned with your institution's travel policies/procedures, as well as the requirements in <u>2 CFR 200.475</u> Travel Costs.
- e. Equipment (i.e., laboratory equipment, start up for new employees)
 - i. Please refer to the equipment regulations in <u>2 CFR 200.313</u> and <u>2 CFR 200.439</u>.
- f. Supplies for grant activities
 - i. Please refer to the equipment regulations in <u>2 CFR 200.314</u> and <u>2 CFR 200.453</u>.
- g. Food for conferences and events
 - Allowable uses of food can be found at https://www.ed.gov/media/document/faqs-food-and-conferences-107432.pdf.
- h. Participant Support Costs
 - i. This is typically allowable for grant activities; however, we recommend consulting with your Program Specialist before spending money for this purpose.
- i. Administrative Costs
 - As stated in the <u>NIA</u>, this program does not include any program-specific limitation on administrative expenses. All administrative expenses must be reasonable and necessary and conform to Cost Principles described in <u>2</u> <u>CFR part 200 subpart E</u> of the Uniform Guidance.
- j. Renovations/Remodeling
 - i. Only minor renovations/remodeling are allowable costs are under the competition. Minor remodeling means minor alterations in a previously completed building. The term also includes the extension of utility lines, such as water and electricity, from points beyond the confines of the space in which the minor remodeling is undertaken but within the confines of the previously completed building. The term does not include building construction, structural alterations to buildings, building maintenance, or repairs.

SECTION 8: TECHNICAL ASSISTANCE

65. Who should we provide CVs for?

It is recommended that you provide CVs for all project personnel at the lead applicant institution/organization, as well as any project personnel from subaward and/or partner entities.

66. Are non-degree/non-certificate programs and/or non-credit courses allowable as a short-term program?

No, short-term programs must lead to a recognized postsecondary credential that is stackable towards one or more certificate or degree programs.

67. What is the target population this grant is geared towards? Is there a minimum number of individuals that the intervention(s) must impact?

AP1 must include efforts designed to assess the learning gains made by postsecondary students, but a proposal does not need to be only focused on postsecondary students. It is the applicant's responsibility to adequately address how their project will meet the absolute priority through its services, activities, and target audience.

There is no minimum or maximum number of individuals the intervention must impact.

68. Is there an expectation for the percentage of time expended by the Project Director?

We do not determine the time and effort of directors. You should set the percentage based on what you deem appropriate and explain why. This should be well explained in your management plan and budget.

69. Can a PD/PI be multiple individuals?

Yes.

70. Does the Project Lead (director or investigator) need to be a full-time position?

No, but you want to make sure that there is adequate time dedicated to the management and implementation of the project, and sufficient key personnel dedicated to accomplishing the goals and objectives of the grant.

71. If we have not hired a project director, whose CV do we upload?

You may want to include a job description if this person has not yet been hired.

72. Can I hold a FIPSE – SP grant at the same time as another Department of ED grant? Yes.

73. I am having trouble uploading my documents, what should I do?

If you have problems submitting to Grants.gov, please contact Grants.gov Customer Support at 1-800-518-4726 or email at: support@grants.gov or access the Grants.gov Self-Service Knowledge Base web portal at: https://grants-portal.psc.gov/Welcome.aspx?pt=Grants.

SECTION 9: OPEN LICENSING

This guidance is not intended to create new requirements but to clarify issues that arise from the implementation of the rule published on January 17, 2017. The text can be found at 2 C.F.R. §3474.20 and online, click here.

If you are responding to a notice inviting application (NIA) for an open grant competition and have any questions about this guidance or about an aspect of the open licensing requirement that is not addressed in this guidance, please submit your questions to the contact listed in the <u>NIA</u> with a copy to <u>tech@ed.gov</u>. Please also feel free to provide comments or other input on this guidance to <u>tech@ed.gov</u>.

74. What is the open licensing requirement for competitive grant programs, aka "open rule"?

Beginning with FY 2018 grant competitions, in accordance with the "open rule" published in early 2017, the Department is generally requiring that for competitive grants, grantees and subgrantees must openly license grant deliverables created wholly or in part with Department grant funds. This requirement will apply to new copyrightable works and any new modifications to pre-existing works that are separately identifiable and developed during the grant implementation.

Under this open rule, all new NIAs for discretionary grant programs will clearly indicate whether that program is subject to the requirements of the open rule or whether it has been granted an exception. The unusual circumstances needed to justify exceptions for individual grantees and grant deliverables are also described in the open rule (more guidance on this may be developed in the future).

75. Does the open rule apply to all copyrightable works?

Unless an exception applies to the grant program, the open rule applies to all final grant deliverables created wholly or in part with Department funds, including any program support materials.

Final grant deliverables are final versions of a work developed to carry out the purposes of the grant. Each year, the Department funds a variety of grant programs that support a diverse array of grant-funded works. These have included instructional materials, personalized learning delivery systems, assessment systems, language tools, and teacher professional development training modules, just to name a few.

Program support materials are materials that are necessary to understand, learn from, use, and replicate the final grant deliverables. For example, some support materials may document best practices in implementation of certain tools for specific target populations. Since the best practices would be considered a key element to the appropriate use of final grant deliverables, they would be covered by the requirement that they be openly licensed and made available to the public.

Materials, such as staff training guides, production guides, or planning documents that are created as a result of implementing the grant project, may or may not provide useful information for understanding the administration of grant activities. In these cases, the Department is committed to working with grantees to determine whether these should be openly licensed. Other copyrightable works, such as email correspondence, administrative documentation, or deliberative work products that are produced through a grant project, will generally not be considered program support materials necessary to the use of the deliverables and therefore would not need to be openly licensed. The open rule only applies to copyrightable works and does not apply to the creation of "trade secrets" or "patentable inventions" with Department funds.

76. How does the open rule apply to previously licensed materials?

The open rule does not apply to any pre-existing intellectual property. This includes existing copyrightable works or any copyrightable works purchased by grantees or created by grantees without any funds from the Department.

77. How does the open rule apply to modifications to existing materials?

The rule applies only to modifications that are separately identifiable from the existing materials and do not apply to existing materials themselves.

78. How does the open rule apply when a work is built using a copyrighted or patented product?

The open rule does not apply to the tools used to create a final grant deliverable, only to the deliverable itself.

79. What are the exceptions to the open rule?

There are some specific exceptions to the open rule:

Program Exceptions

- **a.** Grant programs that provide funding for general operating expenses
- **b.** Grant programs that provide support to individuals (e.g., scholarships, fellowships).
- **c.** Grants awarded through the Ready to Learn Television Program, which already has a well-established system of disseminating the products of the grants.

Materials/Resources

- **a.** Peer-reviewed scholarly publications that arise from any scientific research funded, either fully or partially, from grants awarded by the Department.
- **b.** Final grant deliverables that are jointly funded by the Department and another Federal agency, if the other Federal agency does not require the open licensing of its final grant deliverables for the relevant grant program.
- **c.** Works created by the grantee or subgrantee not using Department grant funds, including matching funds, unless an exception is made.

Individual Exceptions

- **a.** The Secretary has determined that unusual circumstances exist that warrant the grantee (or subgrantee) to receive an exception.
- **b.** The Department has determined that compliance would conflict with other intellectual property rights of the grantees (or subgrantees).
- c. If one of these program exceptions applies to a grant program, it will be clearly stated in the NIA. Exceptions for specific deliverables or for individual grantees can be considered after a grant is awarded. These case-by-case decisions will be made during the period of grant performance, as deliverables are developed and there is more information about the deliverable, such as the nature of the content, funding sources, and specific areas of conflict.

80. What are examples of final grant deliverables that are covered by the open rule?

- Grants by the Department's Office of Special Education Programs (OSEP) aim to create resources that support children, youth, and adults with disabilities. Through these grants, Benetech, a nonprofit corporation operates the DIAGRAM+ Center to provide image and math accessibility for students with print disabilities, such as blindness and dyslexia, autism spectrum disorders, hearing impairments, intellectual disabilities, and other disabilities, as well as students with any disabilities who are also English language learners. Benetech has voluntarily provided these resources under a Creative Commons license so that all schools, community organizations, technology developers, and students may freely use, adapt, and widely redistribute the assistive technologies, resources, and training materials. For more information, visit: http://diagramcenter.org/.
- The National Language Resource Centers (LRC) program funds institutions of higher education to research and develop resources for Less Commonly Taught Languages (LCTL). Though there was no requirement for the grantees to openly license their resources, the University of Texas at Austin elected to openly license the Center for Open Educational Resources and Language Learning (COERLL), which creates fully openly licensed language and pedagogical materials for 16 languages, in addition to an open platform for discovery, remix, and repurposing of these language resources and open research found at https://www.coerll.utexas.edu/coerll/.

81. What if the grant program does not require and/or involve the creation of copyrightable materials?

Each year, the Department funds a variety of grant programs. Although many of these result in copyrightable works that would be considered grant deliverables, many grantees do not produce grant materials. In cases where grant deliverables are not required by the grant program or if they are not proposed to be produced by grantees in the execution of their grant projects, the open rule would not apply. If consultation with program officers shows that a grantee will not be developing a deliverable covered by the open rule, the grantee would not need to take further action.

82. What is a license to a work, and what is an open license?

Generally, a license is a legal document that specifies what can and cannot be done with copyrightable work (such as audio, text, an image, or multimedia). It grants the user of the copyrightable work permissions and states any restrictions on use.

Broadly speaking, an open license grants permission to access, re-use, and redistribute a work with few or no restrictions. Some examples of the conditions that must be met in order for a license to be open are available in the Open Knowledge Definition 2.1, but others may apply.

83. How do open licenses relate to open-source software?

An open-source software license is a type of open license specific to computer software and other products that allows source code, blueprints, or design to be used, modified, and/or shared under defined terms and conditions. Generally, to be considered an open-source license, the license on the software or other product must be approved by the Open Software Initiative based on its Open-Source Definition that allows free use, modification, and sharing.

Examples of open-source licenses that can be used to meet the requirements of the open rule include GNU General Public License (GNU-GPL), Apache, Mozilla Public License (MPL), MIT, or those that otherwise follow principles established by the Open-Source Initiative. Grantees may use any open-source license that meets the requirements listed immediately below.

84. What are examples of open licenses that satisfy the requirements of the open rule?

Yes, the open rule requires the selection of any license that will allow the public to use the final grant deliverables as described above in a royalty-free manner, i.e., at no cost. In addition, the license to the final grant deliverable is required to be perpetual and irrevocable.

Open licenses that are royalty-free, perpetual, and irrevocable allow the public to continuously access the licensed final version of the final grant deliverable at no cost. However, grantees may elect to charge for access to services or derivative versions of the final grant deliverable at any time during or after the grant period.

In order to satisfy the requirements of the open rule, the open license must be worldwide, non-exclusive, royalty-free, perpetual, and irrevocable. In addition, the open license must permit the public to:

- **d.** Access, reproduce, publicly perform, publicly display, and distribute the copyrightable work;
- **e.** Prepare derivative works and reproduce, publicly perform, publicly display, and distribute those derivative works; and
- **f.** Otherwise use the copyrightable work, provided that in all such instances attribution is given to the copyright holder.

The open license must also contain:

- **g.** A symbol or device that readily communicates to users the permissions granted concerning the use of the copyrightable work;
- **h.** Machine-readable code for digital resources;
- i. Readily accessed legal terms; and
- i. The statement of attribution and disclaimer specified in 34 CFR 75.620(b).

85. Does an open license mean that we must allow the public to access the final grant deliverables at no cost?

Yes, the open rule requires the selection of any license that will allow the public to use the final grant deliverables as described above in a royalty-free manner, i.e., at no cost. In addition, the license to the final grant deliverable is required to be perpetual and irrevocable

Open licenses that are royalty-free, perpetual, and irrevocable allow the public to continuously access the licensed final version of the final grant deliverable for no cost. However, grantees may elect to charge for access to services or derivative versions of the final grant deliverable at any time during or after the grant period.