

**Questions and Answers for
Combating Sports Corruption in Mexico
OFOP0001599**

Date: September 25, 2024

Updated: September 30, 2024

Q1 - Although the NOFO states that Public International Organizations (PIOs) are ineligible to apply for this funding, I would like to check if an exception can be granted for this opportunity.

R - Unfortunately, no exceptions can be made in regards to awarding a grant to a PIO as a prime recipient. In short, INL has [C-175](#) authority which allows us to fund PIOs, but through International Organization Letters of Agreement (IO-LOAs), not grants.

Q2 – The Eligibility criteria does not appear to exclude national government agencies. Can you please confirm this? In addition, can national government agencies be engaged as a sub-partner – or should individual employees be engaged as consultants?

R –National government agencies are not listed as an eligible applicant type, therefore, national government agencies cannot serve as a prime or lead applicant. However, a national agency can serve as a subcontractor.

Also, see response to question 3 regarding the engagement of a sub-partner or individual employees.

Q3 – Person “X” is the principal of their own law firm. Person “X” recently presented at a conference on the fight against corruption in sports. Can person “X” be included under their law firm, or in their individual capacity?

R- It depends. If an agreement is made directly with person “X,” then person “X” should be included as an individual consultant. However, if an agreement is made with the law firm to utilize person “X” services, the law firm should be included. Please consult 2 CFR 200.331 - Subrecipient and Contractor Determination for additional guidance.

Q4 – Can individuals be engaged by eligible organizations as consultants?

R- Yes. Please consult 2 CFR 200.331 - Subrecipient and Contractor Determination for additional guidance.

Q5 - Can you please clarify whether all Partners/ Consultants (or sub-recipients) are required to have an UEI regardless of the proposed budget amount (i.e., not just the Lead Agency)? (Page 25 of the NOFO)

R – All proposed sub-recipients are required to have a Unique Entity Number (UEI), regardless of the proposed budget amount, prior to receiving funding. An active SAM.gov registration is not required for sub-recipients.

Note that it is the responsibility of the respective organization to obtain a UEI. Any issues encountered should be directed toward SAM.gov as INL bears no responsibility in this matter.

Q6 - I am assuming that a Public International Organization (PIO) is ineligible to apply as the Lead organization, but can it contribute expertise/ support – as a formal partner, or informally?

R – PIOs cannot serve as a prime recipient for INL funding (see response to Question 1). However, PIOs can serve as a sub-contractor.

Q7 - Is it allowable to include a technological tool that was developed under a previous project?

R – Yes, it is allowable.

Q8 - Could you please clarify whether it is permissible to allocate a portion of the grant for the purpose of an awards system?

R - In general, prizes (or rewards) may be considered an allowable cost under certain circumstances. However, a prize should not be an end in itself, but one means within a broader strategy (2 CFR §200.100(e) references OMB M-10-11 guidance on the Use of Challenges and Prizes). The award should have a broader goal where prizes are just a step to fulfilling the larger goal. A stand-alone award just to pay prizes would not be allowed.

Q9 - Could you kindly confirm if it would be possible for a consultant, who is already involved in another proposal, to also participate in our proposal as a consultant?

R – Yes.

Q10 - Is it possible for a Public International Organization (PIO) to partner with a civil society organization (CSO)?

R –See response to question 6.

Q11 - Could you kindly confirm if the total funds allocated are up to \$2 million for each award, or in case there are 2 awards, the total funds will be divided between both of them?

R- There is a maximum of \$2 million of total available funding. Whether one or more awards are selected for funding, the total funding will not exceed \$2 million.

Q12 - Can INL suggest the percentage of the budget that should be directed towards the public media messaging campaign?

R – INL does not have a suggested budget as it would depend on how each proposal is built.

Q13 - Page 9 of the solicitation indicates that the Proposal Narrative should be a “Maximum 20 pages” but “Recommended page limit: 10.” Can INL clarify the desired length for the Proposal Narrative?

R – The recommended and page limit is 10 pages. However, proposal narratives should not exceed 20 pages. Any proposal narratives that exceed the 20-page maximum, only the first 20 pages will be reviewed by the panel.

Q14 - Can you clarify, not just copyright, but ownership of Intellectual Property, so it can be used for future research and teaching purposes?

R - Unless otherwise specified, the recipient may copyright any work that is subject to copyright and was developed or acquired under a Federal award. However, the Department reserves a royalty-free, nonexclusive and irrevocable right to reproduce, publish, or otherwise use the work for Federal purposes, and to authorize other entities, including other non-Federal entities, to do so. In addition, the Federal Government has the right to obtain, reproduce, publish, or otherwise use data produced under a Federal award.

Please also refer to the 2 CFR 200. 315 and 2 CFR 600.315.

Q15 - As part of our project proposal is it necessary to develop a recruitment strategy to ensure that local Mexican agencies are contacted and know about the program or is this

something that the State Department will do? If State Department does not do the recruitment, is there a vetting for the applicants or should we build in both recruitment and vetting processes to our proposed program?

R – INL Mexico may assist on contacting the Mexican Agencies, however, ideally the potential awardee should have the ability to reach out to government officials on its own.

Q16 - If we are to include Mexican-based partners in our proposal, what type of organizational type is allowable (e.g., educational institutions, charities, non-charitable organizations)?

R – Please see responses to questions 2, 3, and 4.

Q17 - On Page 12 of the NOFO, under Applicant Management Capabilities, History of U.S. Government Federal Assistance Awards, it asks for an outline of the applicant organization's experience in implementing U.S. government-funded federal assistance awards. How many years or awards should this cover?

R – There is no specified years or awards. However, applicants are encouraged to provide as much of an exhaustive list as possible of current and completed projects indicating their organization's experience with implementing U.S. government-funded federal assistance awards.

Q18 - For each of the four activities, could you please clarify which should include Federal and/or State level actors?

R - This should be determined by each proposal and be based on the developed project context section.

Q19 - To what extent should we prioritize the World Cup 2026 in our initiatives? This includes both the prioritization of States and the focus on football relative to other sports.

R - Please see response question 18.

Q20 - To what extent should we offer virtual versus in-person capacity building?

R - Please see response to question 18.

Q21 - Can INL please clarify if the performance assessment plan (referenced on page 5 of the NOFO) is meant to be different from the performance monitoring plan (referenced on page 10), or are they the same item?

R – This refers to the documents on page 10 that should be finalized with the INL team after the award process is completed.

Q22 - Does INL expect a specific type of work product from the performance assessment plan, such as a final assessment report or evaluation?

R – Please see response to question 21.

Q23 - Does INL have any preference on if the performance assessment occurs throughout program implementation or at the end of program implementation?

R – Per the NOFO, if a full performance assessment plan cannot be defined at the time of the proposal, applicants should indicate that the plan is notional. If selected, a final version of the documents will be required as an early deliverable. This means this has to be delivered by the beginning of the project implementation.

Q24 - Relevant sports authorities (e.g. Olympic committee, sports federations, governing bodies, etc.) are included in the Project Vision but not in the Project Goal or Objectives, can INL confirm that engaging with sports authorities is a priority of this program? Additionally, in objective 2, when “regulatory authorities” is mentioned, does INL mean Mexican government authorities or sports authorities?

R – Please see the “participants and audience” section in the NOFO. These should also be determined based on your developed project context section. In addition, regulatory authorities can be both sports or government agencies.

Q25 - The project goal specifies increase in capacity to “detect, investigate, and prosecute financial crimes and corruption.” However, is the type of corruption limited to financial corruption or can it relate to other types of corruption such as sexual corruption or doping?

R – Other crimes or behaviors can be included but priority should be corruption and financial corruption. These should be in line to the Mexican legal framework.

Q26 – How does INL define Public International Organizations (PIOs)?

R – INL defines PIOs based on the definition included in the 2 CFR 200.1. Any organization that meets the criteria indicated below, would qualify as a PIO. However, INL does not bear responsibility for determining whether an organization meets the criteria. It is based on regulatory requirements.

Foreign public entity means:

- (1) A foreign government or foreign governmental entity;
- (2) A public international organization, which is an organization entitled to enjoy privileges, exemptions, and immunities as an international organization under the International Organizations Immunities Act ([22 U.S.C. 288-288f](#));
- (3) An entity owned (in whole or in part) or controlled by a foreign government; or
- (4) Any other entity consisting wholly or partially of one or more foreign governments or foreign governmental entities.

As noted in previous responses, PIOs are not eligible to apply as a prime recipient to this funding opportunity. However, PIOs can serve as a subcontractor.