



FY 2015 Citizenship and Integration Grant Program Questions and Answers

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Categories:

[About the Grant Program](#)

[Eligibility](#)

[Grant-Funded Activities](#)

[Application](#)

[Budget](#)

[Evaluation](#)

[Grants.gov Requirements](#)

About the Grant Program

Q1. What is different about this year's [notice of funding opportunity](#)?

A1. There are a few important changes to this year's grant program:

- Applicants must provide 40 hours of instruction over an 8-15 week class cycle for students at or below the National Reporting System (NRS) high intermediate level; and
- Applicants must enroll minimum of 200 non-duplicated lawful permanent residents in citizenship classes with a minimum of 40 hours of instruction over the two year period of performance.

Q2. Where can I send questions?

A2. You may send questions about the [notice of funding opportunity](#) to citizenshipgrantprogram@uscis.dhs.gov. For questions about the budget or [Grants.gov](#), you may email CISMailbox@hq.dhs.gov. You may also contact Grants.gov directly at support@grants.gov or call 1-800-518-4726. The Grants.gov Contact Center is open 24 hours a day, 7 days a week.

Q3. Is there a list of current USCIS grant recipients available?

A3. Yes. You can find a list of current and previous grant recipients on the [Citizenship Resource Center](#) web page.

[Back to the top](#)

Eligibility

General Eligibility

- Q1. Does my organization need to demonstrate 501(c)(3) status or is it acceptable to simply be a nonprofit organization?**
A1. You do not need to have 501(c)(3) status. However, to be eligible, you must provide proof of public or nonprofit status as defined in Section D.9 of the [notice of funding opportunity](#).
- Q2. My organization has a pending application for 501(c)(3) status. May I apply for this funding opportunity?**
A2. Yes. However, you must have proof of public or nonprofit status before Oct. 1, 2015, the start of the period of performance for this grant.
- Q3. My organization is an awardee or sub-awardee under the FY 2013 Citizenship and Integration Grant Program. May I apply for this funding opportunity?**
A3. Yes.
- Q4. My organization is an awardee or sub-awardee under the FY 2014 Citizenship and Integration Grant Program. May I apply for this funding opportunity?**
A4. No.
- Q5. May a state agency apply as the primary applicant?**
A5. Yes. However, the state agency must provide direct citizenship instruction or naturalization application services.
- Q6. My organization applied for the Citizenship Instruction Only grant program in previous years, but that program was eliminated. Is there any way my organization can still apply?**
A6. If your organization has recent experience providing citizenship instruction but not naturalization application services, you will need to find a qualified partner organization that meets the eligibility criteria to provide the naturalization application services. Your organization may apply as either the primary applicant or as a sub-awardee to the primary applicant.
- Q7. I am an individual providing citizenship services to immigrants. May I apply for this funding opportunity?**
A7. No.
- Q8. Are for-profit entities eligible to apply?**
A8. No.
- Q9. My organization is a university-based law clinic. May I apply for this funding opportunity?**
A9. Yes, if your organization has public or nonprofit status. You must also meet the other basic eligibility requirements found on pages 5 and 6 of the [notice of funding opportunity](#).

- Q10. How many naturalization cases must my organization have submitted in the past in order to qualify as having experience with naturalization application services? May I discuss my organization's experience with other immigration services?**
- A10.** USCIS does not set a minimum number of naturalization cases that you must have submitted in the past order to qualify as having experience with naturalization application services. However, you should demonstrate the capacity to submit at least 200 [Forms N-400, Application for Naturalization](#) over the two-year performance period. You may discuss your organization's experience with other immigration services, but we will evaluate and score your application based on your organization's experience specifically with naturalization application services.
- Q11. We provide citizenship instruction and have our own assessment process, but we do not yet use a nationally normed standardized test. Are we still eligible for this grant?**
- A11.** Yes. You do not need to have past experience using a nationally normed standardized test. You must have at least one year of experience in the past three years providing direct citizenship instruction in a classroom setting that follows a curriculum. However, your program design for this grant program must indicate that you will use a nationally normed standardized test of English proficiency for student placement and assessment.
- Q12. We currently provide less than 40 hours of citizenship classes. If funded, we would be able to adjust our classes to provide 40 hours of instruction. Are we eligible to apply?**
- A12.** Yes, as long as you propose to offer 40-hour classes with this grant funding. Your past experience providing citizenship instruction does not necessarily have to include providing 40 hours of citizenship instruction per class cycle.

Partners and Sub-Awardees

Q13. Are partnerships allowed?

- A13.** Yes. USCIS encourages partnerships, particularly when you clearly demonstrate that each partner has the necessary expertise and experience to provide the services you will offer under this grant program. Past experience shows that successful citizenship instruction often includes partnerships between organizations that specialize in adult education, including English as a Second Language (ESL) and citizenship instruction, and organizations that regularly provide naturalization application services within the scope of the authorized practice of immigration law.

If you propose to give a portion of your organization's grant funding to a partner organization to provide additional or complementary direct services, then your organization is the primary applicant and the partner organization is the sub-awardee. Your organization still **must** directly provide citizenship instruction, naturalization application services, or both. The sub-awardee may provide additional or complementary citizenship instruction or naturalization application services.

If you choose to work with a sub-awardee, you must:

- Complete a Memorandum of Understanding (MOU) with the sub-awardee;
- Describe your organization's experience working with the sub-awardee organization and your plan for providing integrated services;
- Monitor the sub-awardee's performance and ensure that the sub-awardee complies with all grant award conditions and data reporting requirements.

Sub-awardees must:

- Have a Data Universal Numbering System (DUNS) number;

- Be responsible for financial reporting; and
- Submit their reports to the primary applicant for submission to DHS.

Q14. My organization has experience providing naturalization application services. If I find a partner to provide citizenship instruction, can my organization apply as the primary applicant?

A14. Yes.

Q15. If I cannot locate a partner with one year of experience in citizenship instruction, what are my options?

A15. Proposed activities under this grant program must include both citizenship instruction and naturalization application services. Your organization and any sub-awardees providing citizenship instruction must be able to demonstrate at least one year of experience in the past three years providing citizenship instruction.

Q16. May I have a partner that is not a sub-awardee?

A16. Yes. However, if a partner receives a portion of the grant funds to provide direct services, USCIS considers the partner a “sub-awardee.”

Q17. Does the sub-awardee need to have at least one year of experience in each program area?

A17. Only if the sub-awardee will use grant funding to provide services in both program areas. You must meet the eligibility criteria for the services that you propose to provide. For example, if the sub-awardee proposes to provide citizenship instruction with grant funding and has at least one year of experience providing citizenship instruction in the past three years, then the organization is eligible.

Q18. We are an adult learning center and we want to partner with a nonprofit organization for legal services. Who should be the primary applicant?

A18. Either you or your partner may be the primary applicant.

Q19. We would like to partner with multiple school districts to reach different areas. Is there a limit on how many organizations we can partner with?

A19. No. There is no limit on the number of sub-awardees that you may have. You should ensure that all organizations meet the eligibility requirements, and you must submit a Memorandum of Understanding (MOU) that outlines the terms of the partnership (see page 18 of the [notice of funding opportunity](#).)

Q20. We do not have experience with formal citizenship instruction or naturalization application services, but our partner has both. Do we still qualify?

A20. If you are the primary applicant, you must have experience providing at least one of the two types of direct services for this program: citizenship instruction or naturalization application services.

Q21. Can we partner with a pro bono attorney?

A21. No. The organization proposing to provide naturalization application services must employ an attorney or BIA accredited representative. You may use pro bono or volunteer attorneys to supplement services, but the pro bono attorney cannot be a partner or sub-awardee

Q22. Can we partner with private attorneys?

A22. No. Applicants and sub-awardees must be organizations with nonprofit or public status. For-profit law firms and attorneys in private practice are not eligible to receive grant funding.

Q23. We are applying with a partner. Do we both need to have experience providing citizenship instruction and naturalization application services?

A23. You are required to meet the eligibility criteria only for the services that you propose to provide.

Q24. Our organization has co-sponsored a citizenship class with another organization for the past year. We have been responsible for outreach, enrollment, and logistics, while our partner organization hired the teacher and been directly responsible for the instruction. Can our organization count this as experience providing citizenship instruction?

A24. No. To be eligible to provide citizenship instruction with this grant funding, your organization must have at least one year of experience in the past three years providing citizenship instruction in a classroom setting that follows a curriculum. If your organization only provided administration and logistics to support a citizenship class, your organization would not meet the eligibility requirement stated above.

However, please keep in mind that either the citizenship instruction provider or naturalization application services provider may apply as the primary applicant. You are only required to meet the eligibility requirements for the services you propose to provide.

Q25. We are working on our BIA accreditation and plan to apply with a qualified partner. Can we terminate our partnership once we receive BIA accreditation?

A25. No. You must continue working with the proposed partner organization throughout the two-year performance period, barring any unforeseen, unusual circumstances.

Organizations with Multiple Offices

Q26. My organization is the local affiliate of a national organization. Does my organization have to be locally incorporated in order to apply?

A26. No. Your organization and any proposed sub-awardees must have public or nonprofit status but you do not need to be locally incorporated.

Q27. Can a national organization with multiple local affiliates apply as the primary applicant? If so, would the organization be allowed to provide direct services to more than one state through local affiliates?

A27. The primary applicant and any proposed sub-awardees must provide direct services in their respective geographic areas. Affiliate offices of a national organization may apply as partners on one application, but one of the affiliates must be the primary applicant.

Q28. Our organization has multiple offices in different states. Can we submit one application, or should each location submit its own application?

A28. Affiliate offices of a national organization may apply as partners on one application, but one of the affiliates must be the primary applicant. Alternatively, the affiliate offices may submit separate applications as long as there is no overlap in funding for the same staff members.

Q29. We are a college with multiple locations, and we have same federal ID number. Will you accept more than one application from us using the same federal ID number?

A29. If an organization has multiple affiliates or locations, more than one affiliate office may apply as long as there is no overlap in funding for the same staff members.

BIA Accreditation and Recognition and Attorneys

Q30. Is my organization (and any sub-awardees) required to be recognized or accredited by the Board of Immigration Appeals (BIA)? If so, how do I prove that my organization meets this requirement?

A30. At the time of application, your organization and any sub-awardees that propose to provide naturalization application services must either: (1) Be recognized by the BIA and have at least one BIA accredited representative employee with experience providing clients with naturalization representation; or (2) Have at least one attorney employee with experience providing clients with naturalization representation.

You are not required to provide proof of BIA recognition or accreditation in order to apply because the list of recognized and accredited organizations is publicly available on the [U.S. Department of Justice's website](#). USCIS may ask for additional documentation before making an award.

Q31. Our organization just received BIA recognition in January, but we have had an off-site attorney working with us in the past. Are we still eligible?

A31. If your organization is recognized by the BIA and you have a BIA accredited representative at the time you apply, you are eligible. You must show that your experience providing naturalization application services was within the authorized practice of immigration law (using an attorney or BIA accredited representative).

Q32. Can we use pro bono attorneys until our staff member obtains BIA accreditation?

A32. No. You must employ an attorney or BIA accredited representative at the time you apply.

Q33. Does the attorney have to be a full-time staff attorney? We have an attorney who comes in once a week.

A33. No. The attorney must be an employee of the applicant or sub-awardee but does not need to work full-time. However, you must establish that the attorney is able to provide sufficient oversight of the program. The attorney must also sign [Form N-400, Application for Naturalization](#) as the preparer and sign [Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative](#) for each Form N-400 filed under this grant.

Q34. The attorneys who provide services for our program are volunteers who receive a stipend. We would use the grant to transition the volunteers to staff members. Would this make us eligible?

A34. In order to be eligible for the grant, you must employ at least one attorney or a BIA accredited representative at the time you apply. If you are awarded the grant, you may use the grant to transition other volunteer attorneys to staff members. For a definition of "employee," see the [FY 2015 Glossary](#). USCIS may ask for additional evidence of the status of attorney or BIA accredited representative employees prior to awarding the grant.

- Q35. Where can we find a list of qualified BIA recognized organizations?**
A35. The Department of Justice maintains a [roster of BIA recognized organizations](#).
- Q36. We plan to apply for BIA accreditation for a staff member right now. We can submit copies of his BIA application with our grant application. Will this make us eligible?**
A36. The process to obtain BIA accreditation can take six months to a year to complete. You may apply for BIA accreditation for your staff now, but it is unlikely you will receive accreditation in time to be eligible for this funding opportunity. In order to be eligible, you must employ an attorney or a BIA accredited representative at the time you apply.
- Q37. Is there a way to speed up the BIA accreditation process so we will qualify for the grant?**
A37. Unfortunately, it is not possible to speed up the BIA accreditation application process. For more information, please visit the Department of Justice's [Recognition and Accreditation Program website](#).
- Q38. We have BIA recognition and accreditation, and we are a national organization with field offices. Does the BIA recognition and accreditation apply to all of our field offices?**
A38. If your organization has distinct branch offices providing legal immigration services at separate locations, each branch office must be individually recognized by the BIA. You must submit separate applications for each branch. Additionally, representatives must be BIA accredited at the branch office location to work there. For more information, see the Department of Justice's [frequently asked questions about the Recognition and Accreditation Program](#).
- Q39. If affiliate offices in different states submit one application, does each location need to have an attorney or BIA accredited representative at the time of application?**
A39. At the time of application, you and any sub-awardee proposing to provide naturalization application services must have either a BIA accredited representative employee or an attorney employee with recent experience providing naturalization representation to clients.
- Q40. Is partial BIA accreditation acceptable under this grant?**
A40. Yes. BIA accredited representatives may have partial accreditation to provide services under this grant program.
- Q41. We currently have a pending BIA accreditation application. How do we demonstrate partial approval so that we can apply?**
A41. In order to be eligible for this funding opportunity, you must employ an attorney or a BIA accredited representative *at the time you apply*.
- Q42. My organization does not have experience providing naturalization application services, but a few months ago we hired a lawyer who has done so independently. Are we eligible to apply?**
A42. No, you are not eligible to apply. In order to be eligible, you must be able to show that your organization has at least one year of experience in the past three years providing naturalization application services within the authorized practice of immigration law. You cannot count your recently hired lawyer's past experience as part of your organization's experience.

- Q43. One of our Board of Trustees members is an attorney and has been providing naturalization application services for our agency over the past year. Does that qualify us as meeting your requirement?**
- A43. No.** The organization proposing to provide naturalization application services must employ an attorney or BIA accredited representative at the time you apply. A member of the Board of Trustees is not considered an employee. For a definition of “employee” and “employer,” see the [FY 2015 Glossary](#).

[Back to the top](#)

Grant-Funded Activities

- Q1. Are the awards a one-time opportunity, or will there be a chance for grant recipients to renew the funding?**
- A1.** The performance period is two years. There is no option to renew funding after two years.
- Q2. If affiliate offices in different states submit one application, does each location have to provide both citizenship instruction and naturalization application services?**
- A2.** Yes. If the applicant and sub-awardee are proposing to provide services in different states, then each location must provide both citizenship instruction and naturalization application services.
- Q3. The [notice of funding opportunity](#) asks how our services will differ with grant funding. Should we discuss how we plan to grow our current services, or how our current services differ from what we propose to offer with grant funding?**
- A3.** You must discuss how the grant program will expand and improve the existing services that you offer, even if the existing services are similar to the proposed services. For example, you might hire new teachers or offer an additional class to accommodate students’ schedules.
- Q4. Does the “Program Expansion” section of the [notice of funding opportunity](#) (see pages 13 and 15) apply to FY 2013 grant recipients since the FY 2015 grant would be a continuation of the program and not an expansion?**
- A4.** All applicants, including FY 2013 grant recipients, must discuss how the grant program will expand and improve the existing services offered, even if the existing services are similar to the proposed services. For example, you might hire new teachers or offer an additional class to accommodate students’ schedules.

Citizenship Instruction

- Q5. Must the primary applicant offer citizenship instruction?**
- A5.** The primary applicant must provide citizenship instruction, naturalization application services, or both.

- Q6. The [notice of funding opportunity](#) states that organizations must provide services to lawful permanent residents only (see pages 2, 13 and 16). If my organization also serves other immigrants, should my organization place lawful permanent residents in a class by themselves?**
- A6.** Organizations must adequately demonstrate that only lawful permanent residents will receive services funded by this grant.
- Q7. Can my organization provide general ESL classes or Adult Basic Education under this funding opportunity?**
- A7.** No. This grant funds citizenship instruction to prepare lawful permanent residents for naturalization. You must demonstrate that your organization will offer citizenship instruction that will prepare lawful permanent residents for the civics (U.S. history and government) and English (reading, writing, and speaking) components of the naturalization test. You may not propose to use grant funds for other types of instruction.
- Q8. We currently offer ESL classes, and many of our citizenship students participate in those same classes. Our ESL classes are funded through other grants. Will that arrangement allow us to provide services to individuals who are not lawful permanent residents?**
- A8.** You must ensure that grant-funded citizenship preparation services are provided to **only** lawful permanent residents. This requirement does not affect other programs that are funded by other sources.
- Q9. There is a requirement that students must be assessed using a nationally normed standardized assessment test. What does this mean?**
- A9.** In the context of citizenship education, this refers to specific tests used to determine a student's English language proficiency. A list of standardized tests that the Department of Education has determined to be suitable is available in the [Federal Register](#) and on page 14 of the [notice of funding opportunity](#).
- Q10. Are all students and clients required to take the nationally normed standardized test regardless of their English proficiency level?**
- A10.** All students enrolled in citizenship instruction classes under this grant program must take the standardized test unless they meet the requirements to take the naturalization test in their own language. Clients who receive naturalization application services but do not need citizenship instruction classes are not required to take the standardized test.
- Q11. How should I balance USCIS's minimum instructional hour requirements with the instructional hours required by the vendors of nationally normed standardized tests?**
- A11.** The minimum instructional hour requirements for this grant program are listed in the [notice of funding opportunity](#) (see page 3). You may offer more instructional hours than the minimum requirement. A greater number of instructional hours may correspond better with test vendor requirements. However, you still must use a nationally normed standardized test of English proficiency for the citizenship instruction program, even if you offer a class with fewer instructional hours than the test vendor recommends.
- Q12. Is my organization required to use paid instructors to teach citizenship classes?**
- A12.** No, you are not required to use paid instructors. However, USCIS has observed that a successful citizenship instruction model includes paid instructors. Therefore, USCIS prefers that applicants

and sub-awardees propose to include one or more paid teachers with at least one year of experience teaching ESL or citizenship.

Using volunteers can enhance a program's service offerings, but volunteers must have adequate training and support. If you propose to use volunteers to teach citizenship instruction, you must demonstrate that the program has a comprehensive volunteer-training program and sufficient program oversight by a paid program coordinator or paid lead teacher who is qualified to manage and oversee an education program. A paid lead teacher or a paid education program coordinator must supervise the volunteers.

Q13. Are all citizenship teachers required to have one year of teaching experience?

A13. Yes. All citizenship teachers providing services under this grant program must have at least one year of experience teaching ESL or citizenship to adults (see pages 3 and 14 of the [notice of funding opportunity](#)).

Q14. May I propose to use volunteers as citizenship teachers?

A14. Yes. However, all paid and unpaid teachers providing services under this grant program must have at least one year of experience teaching ESL or citizenship to adults. Also, a paid lead teacher or a paid education program coordinator must supervise volunteer teachers. If volunteers do not have requisite experience, USCIS encourages you to use these volunteers to provide tutoring or to assist teachers in the classroom.

Q15. Is the citizenship education coordinator required to have teaching experience?

A15. No. There is no requirement regarding the experience of the citizenship education coordinator. However, USCIS has observed that successful citizenship instruction programs employ education coordinators with teaching and management experience.

Q16. Are we required to provide an equal number of hours of citizenship instruction for every week of the cycle?

A16. No. You are not required to provide an equal number of hours of citizenship instruction for every week of the class cycle. However, most successful applicants have a fixed schedule that does not vary from week to week. If you propose to provide a varying number of hours per week, please note this in the class cycle table in the project abstract, and explain the schedule in the project narrative.

Q17. Is my organization required to offer more than one level of citizenship instruction?

A17. No. However, USCIS has observed that successful citizenship instruction programs offer more than one class level to meet the different instructional needs of students. Applicants offering a multi-level class should explain how the different levels will be managed in the classroom.

Q18. May my organization offer only one level of instruction under this grant program and refer students to other providers for all other levels?

A18. Yes.

Q19. Can we count tutoring hours towards the number of instructional hours that we are required provide for each class?

A19. No. Only classroom instructional hours can be counted towards the requirement.

- Q20. Can students receiving tutoring be counted towards the enrollment goal?**
A20. It depends. If you provide one-on-one instruction through formal tutoring that operates like a class (follows a curriculum and includes assessments), then you may count those students towards the enrollment goal. Students receiving informal, unstructured tutoring do not count towards the enrollment goal.
- Q21. We have a structured citizenship class model, and we would like to partner with another program that specializes in test preparation for homebound students. Is that allowed?**
A21. You may partner with other direct service providers who offer specialized services, such as citizenship preparation services for homebound students. The homebound students may count towards your enrollment goals only if you propose to have a curriculum in place and assess all students.
- Q22. In the past, USCIS has allowed applicants to provide 24 hours of instruction to students at the low intermediate level and above. Why are we now required to provide 40 hours of instruction?**
A22. USCIS has determined that the strongest need for citizenship preparation services is among permanent residents with lower levels of English language proficiency, and these students require more instructional hours to prepare for the naturalization test. We made this change to better align with our policy priorities.
- Q23. Can we propose to offer some classes at 40 hours and other classes at 24 hours?**
A23. You may offer 24-hour classes as a supplement to the program, but you are still required to enroll at least 200 students in 40-hour classes. You are welcome to propose to serve more than 200 students. For example, you could set your enrollment goal at 300 and enroll 200 in 40-hour classes and 100 in 24-hour classes.
- Q24. We offer some citizenship classes for language exempt students. Are we required to offer those classes at a minimum of 40 hours?**
A24. You may propose to serve students who are exempt from the English language requirement and offer shorter classes to them as a supplement to the program. However, you still must enroll at least 200 non-duplicated lawful permanent residents in citizenship classes with a minimum of 40 hours of instruction over the two year period of performance. The majority of the citizenship instruction you provide through this grant should include both an English component and a civics (U.S. history and government) component.
- Q25. We use the USCIS curriculum for our ESL and citizenship courses. Will we be able to receive this free curriculum in enough volume to serve the 200 projected clients?**
A25. USCIS does not have a citizenship curriculum, and you are expected to have developed your own curriculum and explain it in your application. (See page 17-18 of the [Notice of Funding Opportunity](#) for what you should include in the curriculum.) USCIS will provide grant recipients with some citizenship preparation materials at the beginning of the performance period. Grant recipients may use grant funding to pay for additional materials.
- Q26. Can you explain what the NRS high intermediate level is?**
A26. For more information on the Department of Education’s National Reporting System (NRS) education levels, see the [NRS Test Benchmarks for Educational Functioning Levels](#). The English as a Second Language functioning levels are listed on pages 4 and 5.

Q27. I have experience teaching as a private tutor. Does that qualify as one year of experience teaching?

A27. Each citizenship teacher in this program must have at least one year of experience teaching ESL or citizenship to adults. However, your application will be more competitive if you propose to use teachers who have experience teaching in a classroom setting that follows a curriculum.

Q28. Our citizenship teacher does not have ESL certification. Is she still eligible to teach under this program?

A28. The teacher must have at least one year of experience teaching ESL or citizenship to adults. ESL certification is not required for this grant program, but having the certification makes your application more competitive.

Q29. If we teach English as a Second Language (ESL) classes that employ a citizenship-based curriculum, would that be enough to qualify for citizenship instruction?

A29. Citizenship instruction is defined as instruction to prepare lawful permanent residents for the civics (U.S. history and government) and English (reading, writing, and speaking) components of the naturalization test (see page 3 of the [Notice of Funding Opportunity](#)). You must demonstrate in the project narrative that your organization has at least one year of experience in the past three years providing citizenship instruction that meets the above definition in a classroom setting that follows a curriculum. You must also demonstrate in the project narrative and in the curriculum attachment that the proposed instruction under this grant meets the above definition. Please review our [Guide to the Adult Citizenship Education Content Standards and Foundation Skills](#) for more information about developing a citizenship curriculum.

Enrollment Requirements

Q30. Can my organization provide grant-funded services to individuals with any legal immigration status?

A30. No. Individuals receiving services under this grant program must be lawful permanent residents. You must demonstrate how you will verify and document that only lawful permanent residents will receive grant-funded services.

Q31. Do individuals who received Deferred Action for Childhood Arrivals (DACA) qualify for services under this grant program?

A31. No. You may serve only lawful permanent residents with this grant funding.

Q32. Can organizations limit services based on national origin, ethnicity, religion, or language?

A32. No. You must serve eligible participants regardless of their ethnic or religious backgrounds, national origin, or the language they speak.

Q33. A lot of the individuals we serve are exempt from the English language requirement. Can we still serve them with this grant funding?

A33. Applicants may propose to serve students who are exempt from the English language requirement. However, the majority of the citizenship instruction provided through this grant should include both an English component and a civics (U.S. history and government) component.

Q34. Does USCIS require applicants to screen for income eligibility?

A34. No. There are no income eligibility requirements under this funding opportunity.

Q35. Does USCIS plan to collect client names and personal data?

A35. USCIS will not collect client names in quarterly reports. However, USCIS may collect alien registration numbers for all lawful permanent residents receiving services with this grant funding. USCIS may use these numbers to track naturalization outcomes during and after the period of performance (see pages 34 and 35 of the [notice of funding opportunity](#)).

Q36. My organization uses an open enrollment system for classes. Is that allowed under this program?

A36. Yes. You do not have to use a particular type of enrollment in your citizenship instruction program. However, USCIS has observed that successful citizenship programs use a closed or managed enrollment model rather than an open enrollment model. As a reminder, you must provide citizenship instruction over an 8 to 15 week class cycle. A class cycle is defined as a period of time with beginning and end dates during which class meetings are held on a frequent basis.

Q37. How many lawful permanent residents must my organization serve with the funds and time allotted?

A37. Over the two-year period of performance, you must provide naturalization application services to at least 200 lawful permanent residents and must provide citizenship instruction to at least 200 lawful permanent residents. We expect that many clients will receive both types of services. If you propose to serve significantly more than the minimum number required, you should rely on your experience to set goals that are realistic and demonstrate a reasonable plan to achieve these goals.

Q38. There is a requirement to enroll 200 individuals in classes and submit 200 naturalization applications. Can we serve the same 200 individuals with both services?

A38. Yes. Successful applicants generally have significant overlap between the individuals who receive citizenship instruction and the individuals who receive naturalization application services. You should integrate your services so that lawful permanent residents are aware of the full range of grant-funded services and can easily access both types of services.

Q39. For the program goals on page 18 and 19 of the [notice of funding opportunity](#), who can we count towards the number of lawful permanent residents that pass the naturalization test (goal 4) and naturalize (goal 5)?

A39. You can count all individuals receiving grant-funded services (either citizenship instruction or naturalization application services, or both) towards the goals for the number of permanent residents who pass the test and naturalize.

Q40. We are a smaller organization and would like to apply for less than the maximum award amount. If we apply for half of the maximum award amount, are we still required to meet the outcomes of 200 students enrolled and 200 naturalization applications filed?

A40. Yes. You may request less than the maximum award amount of \$250,000. However, all applicants must enroll 200 lawful permanent residents in citizenship classes and submit 200 Form N-400, Applications for Naturalization, over the two-year performance period.

- Q41. We receive funding from another government agency and we provide naturalization application services under that contract. Can we count the naturalization applications submitted under that contract towards the 200 served under the USCIS grant?**
- A41.** No. Grant recipients may not count services provided with another grant towards the goals for this grant.
- Q42. Is there a requirement that individuals served have to naturalize during the grant performance period?**
- A42.** No. There is no requirement that the students and clients served through this grant program must naturalize within the grant performance period.
- Q43. Are students required to complete the program in order to count as being enrolled?**
- A43.** For this program, enrollment refers to registering a student in a citizenship class. Some attrition is to be expected, but USCIS would view an unusually high attrition rate as a performance issue.
- Q44. If the grant recipient does not enroll the required minimum of 200 students over two years, what are the consequences?**
- A44.** If you do not meet the minimum program goals (200 students enrolled in citizenship classes and 200 Forms N-400 submitted with Form G-28), then that will reflect poorly on your performance as a grant recipient. USCIS may consider your past performance when making future award decisions.
- Q45. Can we serve high school students with this grant funding?**
- A45.** You may use grant funding to serve high school students as long as they are lawful permanent residents. Keep in mind that applicants must be 18 years old to be eligible for naturalization.
- Q46. Most of our students speak English well but need help with the civics material. Can we serve them with this grant funding?**
- A46.** You may propose to serve students who have a higher English proficiency level, but USCIS would view this as a supplement to your program. If you propose a program focused only on serving students at the higher English proficiency levels, your program would not fit the purpose of this grant opportunity. One of the main purposes of the grant is to support citizenship instruction to prepare permanent residents for *both* the English and civics components of the naturalization test. Grant recipients must enroll at least 200 students in citizenship classes offered at the high intermediate level. or below

Naturalization Application Services

- Q47. Can my organization use grant funds to pay the costs associated with BIA recognition and accreditation?**
- A47.** Yes. However, at the time of application, your organization and any sub-awardees must be BIA recognized and have a BIA accredited representative employee or an attorney employee with recent experience providing clients with naturalization representation. You may use grant funds to pay for additional staff members to pursue BIA accreditation. If you propose a partnership and one of your partner organizations provides only citizenship instruction, that organization may use grant funds to pay the costs associated with BIA recognition and accreditation.

- Q48. If affiliate offices in different states submit one application, do we need a national staff attorney to supervise the BIA accredited representatives?**
- A48.** No. You may use grant funding for staff salaries at the primary applicant organization or at the sub-awardee organization. Grant funding may not support staff salaries at any other offices. Each location providing naturalization application services must meet the qualifications to provide naturalization application services (see pages 5 and 6 of the [notice of funding opportunity](#)).
- Q49. What percentage of naturalization application assistance must be completed by the primary legal service provider as opposed to volunteers?**
- A49.** USCIS does not have a requirement regarding the percentage of application assistance that the primary legal service provider must complete. Organizations proposing to use pro bono or volunteer attorneys to supplement the grant program must ensure that the staff attorney or BIA accredited representative signs Form N-400 as the preparer, files Form G-28 with each Form N-400 filed under this grant, and mails the naturalization application package to USCIS on behalf of the client. You must provide ongoing case management to all naturalization applicants under the grant.
- Q50. Are attorneys and BIA accredited representatives required to submit Form G-28 even if students file Form N-400 on their own?**
- A50.** You do not need to submit a Form G-28 if you did not prepare and submit the Form N-400 or provide other naturalization representation to the student. Attorneys and BIA accredited representatives must sign [Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative](#) when they prepare and submit [Form N-400, Application for Naturalization](#) on behalf of a client or when they provide other naturalization representation to a client, such as assistance with a Request for Evidence or representation at an interview. You must mail the application package to USCIS on behalf of the client.
- Q51. Is an attorney or BIA accredited representative who files Form G-28 with Form N-400 required to attend the naturalization interview with the client?**
- A51.** While naturalization applicants have the right to be represented by an attorney or a BIA accredited representative at the naturalization interview ([see 8 CFR 103.2\(a\)\(3\)](#)), an attorney or accredited representative who submits a [Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative](#) is not required to attend the naturalization interview. At the interview, the interviewing officer may ask the client to sign a waiver indicating his or her desire to proceed without the attorney or BIA accredited representative. Attorneys and BIA accredited representatives should work with their clients to determine whether their services will include representation at the interview.
- Q52. Can my organization use grant funding to support group events that provide eligibility screening and help people fill out naturalization applications?**
- A52.** You may use grant funding to support group events that help people fill out naturalization applications. Regardless of whether you provide services under the grant program in a group setting or individually, you must:
- Provide ongoing case management for naturalization applicants; and
 - Ensure that an attorney or BIA accredited representative signs form N-400 as the preparer, files Form G-28 with each Form N-400 filed under this grant, and mails the naturalization application package to USCIS on behalf of the client.

- Q53. Are volunteer attorneys required to file Form G-28 at group events that help people fill out naturalization applications?**
- A53.** An attorney or BIA accredited representative must sign [Form N-400, Application for Naturalization](#) as the preparer and must submit [Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative](#) with each Form N-400 filed under this grant. Your organization must also mail the naturalization application package to USCIS on behalf of the client and provide ongoing case management to naturalization applicants. You may use volunteer attorneys to provide assistance at a group naturalization application processing event, but USCIS recommends that the grant recipient's attorney or BIA accredited representative sign Form G-28.
- Q54. Can we direct clients to a Web-based system that helps applicants complete and submit naturalization applications on their own if the charge for using the Web-based system is no more than \$50?**
- A54.** No. Attorneys and BIA accredited representatives must sign Form N-400 as the preparer, submit Form G-28 with each Form N-400 filed under this grant, and mail the naturalization application package to USCIS on behalf of the client.
- Q55. When proposing a goal for the number of Forms N-400 my organization will submit, should I separately list the number of cases that include [Form N-648, Medical Certification for Disability Exceptions](#)?**
- A55.** No. When proposing a goal, you should count only the [Forms N-400, Application for Naturalization](#) that you plan to submit under the grant program.
- Q56. How long does USCIS expect us to be involved with the client during the application process, particularly after an application was denied?**
- A56.** We do not have a requirement for how long we expect you to be involved with a case after USCIS has issued a decision. This grant program supports the application preparation process, ongoing case management, and preparation for the naturalization interview. You may set your own policies on additional services provided after a case is denied. You should ensure that you communicate to the client the extent of the services you provide.

Charging Fees

- Q57. Is my organization allowed to charge a fee for services?**
- A57.** Yes, you may charge a nominal fee for services, but it cannot exceed \$50 for either type of service. If your organization proposes to charge for services under the grant program, please present a justification for these fees, including a detailed explanation of how your organization will use the fees to enhance the program.
- Q58. Does the \$50 limit on fees for services include both educational and legal services, or is it a \$50 limit for each service?**
- A58.** The \$50 limit is for each service. You may propose a nominal fee of \$50 or less for citizenship instruction and a separate fee of \$50 or less for naturalization application services. However, it has been our experience that successful programs generally charge less for citizenship instruction than for naturalization application services. Successful programs that charge a fee for citizenship instruction usually charge no more than \$25. Such fees are sometimes used to cover the cost of books and supplies. Being mindful that the grant provides up to \$250,000 to an organization

to support citizenship preparation services, you should justify any proposed fees for services in the budget narrative and include a detailed explanation of how you will use the fees to enhance the program. Program income generated from these fees must go back into the grant-funded program.

Q59. If we charge a nominal fee for services, can we use the program income generated from those fees to pay part of the USCIS application fee for some of our clients?

A59. No. Applicants may *not* use grant funds or program income generated through grant-funded services to pay for USCIS application fees.

Q60. Can we charge more than \$50 for complex naturalization cases?

A60. No. You may propose to charge a maximum of \$50 per client for naturalization application services provided with this grant funding.

[Back to the top](#)

Application

Q1. Is there a required format for the Memorandum of Understanding (MOU)?

A1. No. There is no required format. The MOU should include the responsibilities expected of each party, performance expectations, plans for maintaining communication, and the payment or reimbursement process for the sub-awardee(s). Both parties must sign and date the MOU.

Q2. Should organizations submit an MOU for individual volunteers?

A2. No. The MOU is required for any formal agreement between the applicant and another organization. MOUs are not required for individual volunteers.

Q3. What happens if my organization submits more than one application?

A3. If you submit multiple applications, USCIS will contact you before we begin our review to confirm which application you want to include in the review process. We will not review the other applications.

Q4. May my organization be listed on more than one application, as either the primary applicant or the sub-awardee?

A4. You may apply only once as a primary applicant. If USCIS receives multiple applications with your organization as the primary applicant, we will contact you to clarify which application to consider.

We do not prohibit you from appearing as a sub-awardee on multiple applications. However, you should note that the goal of the grant program is to expand the availability of high-quality citizenship preparation services for lawful permanent residents in communities across the nation. Before making an award, we will consider whether applicants represent a diverse geographic area. We reserve the right to contact all organizations included in the application before making an award.

- Q5. Can I submit letters of support?**
A5. No. You should not submit any documentation other than what is requested in the [notice of funding opportunity](#). We will not consider letters of support.
- Q6. Should I attach a copy of citizenship education materials that my organization has developed, or should I just describe the materials?**
A6. You must include a description of the materials to be used for each class (see page 14 of the [notice of funding opportunity](#)). You may also attach citizenship instruction materials developed by your organization, but this is not required. A description will suffice.
- Q7. Am I required to submit a project plan attachment as in previous years?**
A7. No. Instead of a project plan, you must submit a goal chart. See pages 18 and 19 of the [notice of funding opportunity](#).
- Q8. If we submit our application early and forgot a document, will we be informed before the application deadline so we have time to fix it?**
A8. We will not review any applications before the deadline. If you forgot a document, you may submit a revised copy of your application package as long as you submit it before the deadline. After the application period is over, we will contact applicants to ensure that we review the correct application package.
- Q9. Is a letter of intent required?**
A9. No. There is no requirement that you submit a letter of intent.
- Q10. How to do I attach the project abstract to the application package?**
A10. Attach the project abstract to the “Attachments” form under the “Optional” section of the grant application package. Please note that the project abstract is required and your application will be deemed non-responsive if it is missing.
- Q11. The project abstract asks for a list of any grants received by the primary applicant in the past three years that focused on adult education, legal services, or services to immigrants. We have too many grants that fit that description to list here. How would you recommend we list them?**
A11. Include the grants that are the most recent and most relevant to the services proposed under this grant program. You may provide a short explanation that the list does not include all relevant grants.
- Q12. How do we show in the application that the attorney is an employee at the organization?**
A12. You should list the attorney, like all other grant-funded staff, in the personnel section of the budget narrative and table in your application. The attorney’s line item in the budget should include the full-time equivalent (FTE) and the total amount charged to the grant for that position.
- Q13. In the staff table in the project narrative, we are required to list all paid personnel and volunteer staff. We have over 30 volunteers who work on our program. Should we include all of them?**
A13. Include a few of the volunteers who have been with your program the longest and dedicate the most time to the program. You can include a note indicating the total number of volunteers and explain that they are not all included in the table.

- Q14. For the curriculum attachment, would you prefer an outline or a complete curriculum including all of our presentations and handouts?**
- A14.** You do not need to provide all of your materials, but it would be helpful to see a sampling in order for USCIS’ grant reviewers to assess the content and quality of your curriculum. Your curriculum should include the class level(s), learning objectives, a detailed schedule, topics to be covered, and corresponding materials for each class (see pages 17-18 of the [Notice of Funding Opportunity](#).) Please review our [Guide to the Adult Citizenship Education Content Standards and Foundation Skills](#) for more information about developing a citizenship curriculum.
- Q15. The staff table in the project narrative asks for the FTE charged to the grant. Could you explain what this means?**
- A15.** The FTE (full-time equivalent) charged to the grant refers to the amount of time, as a proportion of a full-time employee’s work hours, that an employee works on this grant program. For example, if you have a full-time employee who spends half of his or her time working for this program, you would show that position as a 0.5 FTE. If you have a part-time employee who spends half of his or her time working for the program, you would show that position as a 0.25 FTE.

[Back to the top](#)

Budget

- Q1. Am I required to submit both a budget narrative and a budget table?**
- A1.** Yes. For more information, see Section D.8 of the [notice of funding opportunity](#).
- Q2. My organization is the primary applicant and proposes to work with several partners who will provide additional direct services and receive a portion of the grant funds. Should I submit one combined budget narrative or separate budget narratives?**
- A2.** You must submit a budget narrative and table for your organization and a separate budget narrative and table for each sub-awardee. Provide the same level of detail for all budget narratives and budget tables.
- Q3. In the “Budget” section of the [notice of funding opportunity](#), USCIS asks applicants to show a balance of costs between the citizenship instruction program and naturalization application services program. What does this mean?**
- A3.** We will evaluate budgets on the extent to which they include reasonable and realistic costs that support and reflect the activities described in the project narrative and the proposed numbers served. Budgets should demonstrate a commitment to providing both high-quality citizenship instruction and high-quality naturalization application services.
- Q4. Is my organization allowed to subcontract services?**
- A4.** Your organization and any proposed sub-awardees must provide direct services and must demonstrate the ability to successfully manage and provide all aspects of the grant-funded project, including financial management.

- Q5. May I list sub-awardee costs as contractual costs?**
A5. No. You must present costs for the sub-awardee organization in a separate budget narrative and table. You should provide the same level of detail in the budgets for both the primary applicant and the sub-awardee.
- Q6. Do volunteer hours count as an in-kind contribution?**
A6. Yes.
- Q7. Which budget category includes facility rental costs?**
A7. You should include facility rental costs under “Other Direct Costs” (see Section D.8 of the [notice of funding opportunity](#)). Facility rental costs should not be more than 20 percent of the total approved budget.
- Q8. How do I demonstrate my organization’s approved fringe benefit rate?**
A8. If a cognizant federal agency has negotiated or approved your fringe benefit rate, provide a copy of the agreement. If no rate agreement exists, provide a breakdown of the amounts and percentages that comprise fringe benefit costs such as health insurance, FICA, retirement insurance, and taxes. Identify the base for allocating these fringe benefit expenses. See Section D.8.c of the [notice of funding opportunity](#).
- Q9. Can I apply for less than the maximum award amount?**
A9. Yes.
- Q10. May I include costs for interpreters and translators? If so, what budget category would those fall under?**
A10. Yes. You may include costs for interpreters and translators under the “Contractual” budget category. However, these costs should be reasonable and justified in the project narrative. When possible, your organization should employ staff with knowledge of the language used by the majority of the lawful permanent residents served in the community.
- Q11. What portion of the grant funds should go to the sub-awardee?**
A11. You should ensure that proposed costs reflect the activities described in the project narrative, and that the budget reasonably balances the costs between the citizenship instruction program and the naturalization application services program.
- Q12. Can we include costs for mileage for staff?**
A12. Transportation costs for employees and volunteers are allowed under this grant. See page 26 and 27 of the [notice of funding opportunity](#) for more information.
- Q13. Should we include curriculum costs in our budget?**
A13. Yes. You may use grant funding to pay for resources to support citizenship instruction, including textbooks and materials (page 26 of the [Notice of Funding Opportunity](#)).

[Back to the top](#)

Evaluation

Q1. Will USCIS favor organizations with limited resources over organizations with substantial resources that do not necessarily need additional funding?

A1. No. An organization's net worth is not one of the evaluation criteria for the Citizenship and Integration Grant Program.

Q2. What point values will USCIS use to evaluate applications?

A2. You can find the evaluation criteria and corresponding point values on pages 29 and 30 of the [notice of funding opportunity](#).

Q3. How can I obtain feedback about my organization's application so that I am better prepared to apply in the future?

A3. After we announce the FY 2015 grant recipients, applicants who did not receive a grant may request a written summary evaluation and score breakdown by sending an email to: citizenshipgrantprogram@uscis.dhs.gov. We will send you the results within 60 days from the date we receive the written request.

Q4. If my organization received a USCIS grant in the past, do I receive preference over organizations applying for the first time?

A4. Each year, USCIS reviews and rates each application individually. We may consider the past performance of previous Citizenship and Integration Grant Program award recipients when making funding recommendations.

Q5. Will the use of technology in the classroom impact how USCIS rates my application?

A5. During the technical review process, USCIS will not assign points for the use of technology. However, before making an award, we may consider several policy priorities, including whether an application incorporates the use of technology in the citizenship instruction classroom (see page 32 of the [notice of funding opportunity](#)).

Q6. May I request a top-scoring proposal from the FY 2014 grant program?

A6. You may submit a [Freedom of Information Act \(FOIA\) request](#) to view a top-scoring proposal from the FY 2014 grant program. However, the grant program requirements have changed and a proposal from last year will not exactly match the requirements of the [current notice of funding opportunity](#). Keep in mind that it may take more than a month to obtain a response to a FOIA request.

Q7. The [notice of funding opportunity](#) states that USCIS may consider whether an application, when balanced with other potential awards and current grant recipients, represents a diverse geographic area (see page 32). What does this mean?

A7. When making an award, USCIS may consider the balance of geographic areas represented by the applicants and current grant recipients. We seek to maximize the number of permanent residents across the United States who can receive services through this grant program.

- Q8. When making awards, does USCIS consider the needs of the region and the existing services in that region?**
A8. It is your responsibility to demonstrate and provide evidence of your community's need for citizenship preparation services. We may consider whether an application, when balanced with other potential awards and with current grant recipients, represents a diverse geographic area.
- Q9. Does USCIS prefer to fund organizations in a particular region in the United States?**
A9. No. You must demonstrate and provide evidence of your community's need for citizenship preparation services. We may consider whether an application, when balanced with other potential awards and with current grant recipients, represents a diverse geographic area.
- Q10. Does USCIS award any points for the project abstract?**
A10. We will not allot points specifically for the project abstract, but reviewers will consider sections of the project abstract (such as the class table) when scoring an application.
- Q11. Can you suggest a website that can help us specifically research lawful permanent resident populations? In the past, we have lost points because we've only been able to break down data by foreign-born populations.**
A11. For data on lawful permanent residents, you may check the [DHS Office of Immigration Statistics](#). Please note that the sections on community need in this year's [notice of funding opportunity](#) ask you to discuss the lawful permanent resident population that your organization *currently serves* and that population's need for citizenship preparation services (see pages 13 and 15.)
- Q12. How much do you consider in-kind support as a factor for funding?**
A12. USCIS does not consider in-kind support during our technical review of your grant application and it does not impact your score. (See page 29 of the [Notice of Funding Opportunity](#) for the list of evaluation criteria.) However, we may consider in-kind support as a strategic program priority when evaluating the finalists at the internal review panel stage (see page 32 of the [Notice of Funding Opportunity](#).)

[Back to the top](#)

Grants.gov Requirements

- Q1. Are partners (sub-awardees) required to register with [Grants.gov](#)?**
A1. No. Only the primary applicant must register with [Grants.gov](#).
- Q2. Are partners (sub-awardees) required to have a DUNS number?**
A2. Yes. If a partner will receive a portion of the grant funds, then the partner is considered a sub-awardee and must have its own DUNS number.
- Q3. Is a national organization allowed to use one DUNS number to submit applications for local offices?**
A3. Yes. A national organization may submit multiple applications under one DUNS number, but it must be clear on each application which location or affiliate office is applying.

Q4. How do I migrate to the System for Award Management (SAM) from the Central Contractor Registration (CCR) system?

A4. To migrate from CCR to SAM, please follow the steps outlined in the [SAM Quick Guide for Migrating Roles](#). You can find more information on SAM at www.sam.gov.

Q5. We are in the process of getting a Taxpayer Identification Number (TIN). Will we have access in SAM while we are waiting?

A5. No. You will need your TIN to register in SAM, so you will not be able to access SAM while you are waiting.

Q6. Can we see the application before we are registered in SAM?

A6. Yes. You do not need to access SAM in order to view the funding announcement for the program. You may access the [notice of funding opportunity](#) at any time. For more information about the program, visit www.uscis.gov/grants.

Q7. How do I find out if we need to update our status in SAM?

A7. To see if your SAM registration is current, [check your status on the SAM website](#). It is important to check this immediately as it may take up to two weeks to update if your registration is not current.

[Back to the top](#)