

2024 U.S. Office of Management and Budget Uniform Grants Guidance Resource

Top Takeaways and Implementation Actions for Federal Agencies

On April 4, 2024, the White House Office of Management and Budget (OMB) released <u>updated</u> Uniform Grants Guidance that sets governmentwide policy for federal grants. These revisions clarify how federal agencies can help improve grantees' capacity to evaluate programs and build data systems. They also make key policy changes that, once adopted by federal agencies, will simplify the federal grants process, reduce administrative burden, promote equity, and improve the customer experience. If implemented effectively, the new guidance will free up time and money, allowing federal grantees – including state, local, and tribal governments – to better use over \$1 trillion in annual federal grants to improve the lives of the people they serve.

For example, OMB's implementing memo for their 2024 Uniform Grants Guidance, M-24-11 Reducing Burden in the Administration of Federal Financial Assistance, specifically instructs federal agencies to reassess merit review processes as they make changes to notices of funding opportunities and to "consider prioritizing Federal awards to applicants that propose evidence-based practices." The U.S. Department of Education systematically does this across their competitive grant portfolio and Results for America has identified a total of 98 federal grant programs at 11 federal agencies that invest in what works by defining and prioritizing evidence of effectiveness.

This guide lays out top takeaways from the updated Uniform Grants Guidance and recommends specific steps federal agencies can take to support effective implementation.

THE 2024 REVISED UNIFORM GRANTS GUIDANCE HAS THE POTENTIAL TO

- Encourage state, local, and tribal governments to invest federal funds in data infrastructure and evidence building, including in integrated data systems
- Make federal grants accessible to more organizations, particularly those representing underserved communities
- Encourage state, local, and tribal governments to get community input, including from affected communities, when designing federallyfunded programs



TOP TAKEAWAYS: WHAT THE UNIFORM GRANTS GUIDANCE DOES

Encourages state, local, and tribal governments to invest federal funds in data infrastructure and evidence-building, including integrated data systems

The revised guidance:

- States clearly that federal grantees may use federal funds to support data and evaluation, including integrated data systems (§ 200.455(c)). With the new language, federal grantees can confidently make critical investments in integrated data systems and analytic capacity. These investments, in turn, can help grantees understand, improve and report on program results effectively, provided there are no statutory barriers to these investments. The guidance offers clear examples of the breadth of activities included under data and evaluation costs.
- Specifies that integrated data systems and program evaluation costs may be considered direct or indirect costs, if they are related to the federal award (§ 200.413(b)).
 These examples help clarify how grantees may use funds in different ways to support these critical needs.
- Encourages federal agencies to consider available data and recent evaluations in program design

CAN FEDERAL GRANT FUNDS BE USED FOR DATA AND EVALUATION?

The 2024 Uniform Grants Guidance uses Section 200.455(c) to explain and give examples of how grantees may use federal funds for data and evaluation. Importantly, these examples are not exhaustive. Even if a use is not listed, it may still be allowable.

§ 200.455(c)

"The costs related to data and evaluation are allowable." Data costs include (but are not limited to) the expenditures needed to gather, store, track, manage, analyze, disaggregate, secure, share, publish, or otherwise use data to administer or improve the program, such as data systems, personnel, data dashboards, cybersecurity, and related items. Data costs may also include direct or indirect costs associated with building integrated data systems — data systems that link individual-level data from multiple State and local government agencies for purposes of management, research, and evaluation. Evaluation costs include (but are not limited to) evidence reviews, evaluation planning and feasibility assessment, conducting evaluations, sharing evaluation results. and other personnel or materials costs related to the effective building and use of evidence and evaluation for program design, administration, or improvement."

(§ 200.202(b)). Putting evidence into use, including through program design, is a critical part of improving outcomes and continuing to build an evidence base.

• Maintains the OMB exceptions authority as a means to support innovation in how programs are designed and administered (§ 200.102(a)). Federal agencies may ask OMB for an exception to Uniform Grants Guidance requirements to test and evaluate new program designs or alleviate compliance requirements while still holding grantees accountable for performance.

Makes federal grants more accessible to potential grantees, particularly those representing under-served communities

The revised guidance:

- Calls on federal agencies to streamline notice of funding opportunities and write them in plain language (§ 200.204). OMB emphasizes the need for agencies to actively strive to make funding opportunities accessible, especially for applicants that are new to federal grants and that support under-served communities.
- Explicitly allows federal award information to be provided in multiple languages (§ 200.111).
 This clarification increases access to specific programs and awards in communities and for organizations where English is not the primary language or may not be the most effective language for communicating and supporting outcomes.
- Grounds reporting requirements in customer experience and agency evaluation plans (§ 200.329(b)).
 By emphasizing the importance of measuring customer experience and considering evaluation plans when outlining reporting requirements, the guidance helps agencies focus and streamline reporting around priorities that tie back to real-life experience and results.
- Streamlines reporting requirements to what is necessary for effective monitoring or evaluation, and enables waivers of unnecessary performance reports (§ 200.329(b), (§ 200.329(g)). By eliminating or waiving performance reports that are unnecessary for a grantee to achieve the goals and objectives of a particular award, agencies can help on-the-ground work and resources stay focused on getting results.



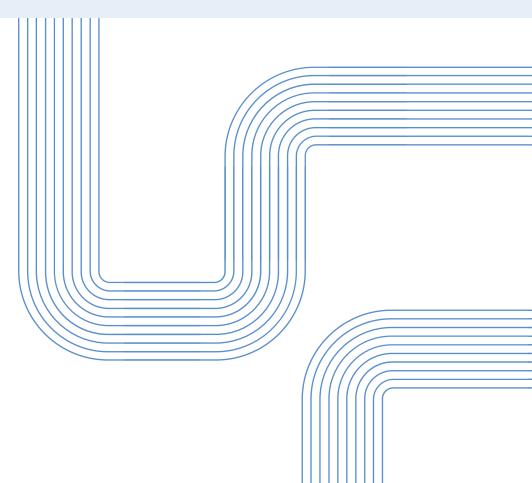
Encourages state, local, and tribal governments to get community input, including from affected communities, when designing federally-funded programs

The revised guidance:

- Calls on federal agencies to design programs with impacted communities and to extend eligibility to all potential applicants (§ 200.202(b)). These mandates, together with the requirement to consider current data and evidence in designing programs, will help agencies build their programs around the real-life needs, challenges and opportunities of the people they intend to serve.
- Requires federal agencies to encourage applicants to engage relevant communities in program design, where practicable (§ 200.202(a)(5)). In addition to agency engagement with communities, engagement by applicants can help ensure that funded projects reflect the priorities, needs, and perspectives of the people and groups who will be directly affected.



See OMB's <u>Reference Guides</u> for more details on key topics including data, evaluation, community engagement, and burden reduction.





IMPLEMENTATION ACTIONS FOR FEDERAL AGENCIES

Outlined here are concrete ways federal agencies can support grantees' investment in data and evaluation, increase access to and simplify the federal grant process, reduce administrative burden, and strengthen community engagement and customer experience through the implementation of the Uniform Grants Guidance.

DATA AND EVALUATION

This guide shares five strategies federal agency staff should take to help build grantees' data and evaluation capacity, offering concrete steps for each strategy:

- 1 Design the review process to prioritize applications that propose evidence-based practices.
- 2 Articulate clear support for data and evaluation in notice of funding opportunities (NOFOs).
- 3 Offer technical assistance both pre-award and post-award that highlights evidence-based practices, data infrastructure, analysis, and/or evaluation.
- 4 Develop reporting requirements that build on evidence-based practices, data infrastructure, analysis, and/or evaluation activities.
- 5 Coordinate across federal agencies during program planning and design.
 - Design the review process to prioritize applications that propose evidence-based practices. OMB's implementing memo on their 2024 Uniform Grants Guidance (M-24-11 Reducing Burden in the Administration of Federal Financial Assistance) specifically instructs agencies to reassess merit review processes as they make changes to NOFOs and to "consider prioritizing Federal awards to applicants that propose evidence-based practices." Results for America has identified a total of 98 federal grant programs at 11 federal agencies that invest in what works by defining and prioritizing evidence of effectiveness. Moreover, in many cases, capacity for collecting and using data plays a key role in successfully implementing evidence-based practices and achieving key outcomes.
 - Include the use of evidence-based practices in merit review criteria.



The U.S. Department of Education <u>guidance</u> uses an evidence framework that includes definitions for evidence-based interventions, including for strong, moderate and promising evidence and evidence that demonstrates a rationale. These definitions help competitive grant programs distinguish and prioritize different evidence levels among applicants. U.S. Department of Education regulations further provide <u>general selection criteria</u> to apply these evidence definitions in NOFOs, specifically "the extent to which the proposed project is supported by promising evidence (as defined in 34 CFR 77.1(c))."

The Substance Abuse and Mental Health Services Administration's (SAMHSA) <u>Mental Health Block Grant</u> (MHBG) includes a 10 percent set-aside of allocated funding for evidence-based interventions to address the needs of individuals with early serious mental illness.

Include a commitment to invest in and use data infrastructure, analysis, and/or evaluation in merit review criteria.

The U.S. Department of Labor's (DOL) <u>Strengthening Community Colleges Training Grants</u> competitions require grantees to conduct an evaluation of their projects using grant funds. In some years, DOL offered additional, competitive funding for rigorous project evaluations.

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Results for America's <u>Defining and Prioritizing Evidence of Effectiveness in Grant Programs</u> outlines two steps that agencies can take when developing their Notices of Funding Opportunity (NOFOs) to increase the likelihood that grant funds produce the intended results.

Articulate clear support for data and evaluation in notice of funding opportunities (NOFOs). Using the OMB Uniform Grants Guidance NOFO template in Appendix I, look for ways to highlight opportunities to invest in integrated data systems, data infrastructure, data analysis, evidence-based practices, evaluation activities, and related costs such as in the executive summary, program description, and application review criteria.

The U.S. Department of Health and Human Services' Maternal, Infant, and Early Childhood Home Visiting (MIECHV) Program FY2024 NOFO states that at least 75 percent of service delivery funding must be allocated toward one or more of the home visiting models which meet the evidence criteria developed by ACF's Home Visiting Evidence of Effectiveness (HomVEE) review committee. In addition, awardees must report on how their program performs across six benchmark areas, and they must show that they've improved in at least four of the six areas.



Executive Summary. This plain language description of the program summarizes the
goals and objectives, target audience, and eligible recipients in 500 words or less. Use the
executive summary to acknowledge that integrated data systems, data infrastructure,
data analysis, evidence-based practices, evaluation activities, and/or related costs will
play important roles in meeting program goals and objectives and clarify up front that
grant funds can support these functions. See Appendix I Section(b)(1)(i)(H).

- **Program Description.** This section contains the full program description of the funding opportunity, including several subsections where data and evaluation can play a key role. The following required program description items may be appropriate to address data and/or evaluation. See Appendix I Section(b)(3)(i) paragraphs (B) through (G).
 - Agency funding priorities or focus areas. Would evidence-based practices, data infrastructure including integrated data systems, analysis, and/or evaluation be an effective emphasis?
 - Program goals and objectives. Is supporting grantee data infrastructure, analysis, or evaluation among the goals and objectives?
 - Description of how the award will contribute to achieving the program's
 goals. How can evidence-based practices, data infrastructure, analysis, and/or
 evaluation play a key enabling role in program goals, including priorities identified
 in consultation with impacted communities during program design?
 - Expected performance goals, indicators, targets, baseline data, data collection, and other outcomes the federal agency expects recipients to achieve. A grantee's ability to collect, store, and use data effectively is critical to tracking and understanding meaningful outcomes. How does the agency expect grantee data infrastructure including integrated data systems, analysis, or evaluation to play a role in performance, outcomes, and data-related activities? How can funds be used in this way?



Looking for more resources? See Results for America's <u>Guide for Clear Outcomes</u>, <u>Evaluation</u>, and <u>Evidence Language in Federal Notice of Funding Opportunities</u>.



• **Unallowable costs.** Should applicants know of any costs related to data infrastructure, analysis, and/or evaluation that are specifically unallowable as they propose their project?

In addition, the following optional program description items may be appropriate to address data infrastructure, analysis, and/or evaluation. See <u>Appendix I Section(b)(3)(ii)</u> paragraphs (A) and (B).

- Program history. Have evidence-based practices, data infrastructure, analysis, and/or evaluation played a meaningful role in the development, evolution, or priorities in the program?
- Past project examples. How have evidence-based practices, data infrastructure, analysis, and/or evaluation played an important role in the success of past projects, or how have grantees used program funds to support these functions and activities in key ways?
- Application Review Criteria. This section addresses how the federal agency will conduct the review process for competitive awards. Because review criteria help determine which applications are funded, they send one of the strongest signals about what the program and agency value. See Appendix I Section(b)(6)(ii) and based on the priorities, goals, and objectives of the program, should investments in evidence-based practices, supporting or using data infrastructure, analysis, and/or evaluation be included in the criteria that determine awards?

The <u>AmeriCorps State and National Competitive Grants NOFO</u> assigns 20 of 100 points in its selection criteria for the strength of the evidence base supporting an applicant's proposed program design.

The <u>System of Care Program</u> for children with serious emotional disturbances awards 25 of 100 points in its selection criteria based on the evidence for the proposed approach and the associated plan for monitoring and fidelity.



Looking for more resources? See Results for America's Economic Mobility Catalog of evidence-based practices.



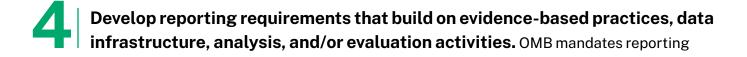
The <u>Safe Streets and Roads for All (SS4A)</u> grant program under the U.S. Department of Transportation funds "demonstration activities" to support grantees in testing and evaluating strategies to improve road safety. Data collection and evaluation activities are among the application review criteria.

Offer technical assistance — both pre-award and post-award — that highlights evidence-based practices, data infrastructure, analysis, and/or evaluation.

The <u>Temporary Assistance for Needy Families (TANF) Data Collaborative Equity Analysis Awards</u> from the U.S. Department of Health and Human Services, Administration for Children and Families support state, territory, or county TANF agencies in conducting equity-focused analyses of their TANF and other human services data. ACF will provide intensive training and technical assistance to build the capacity of grantee agencies.

The <u>2019 WIC Special Project Innovation grant</u> from the U.S. Department of Agriculture's Food and Nutrition Service offered pre – and post-award technical assistance. Post-award technical assistance included support to grantees to develop evaluation plans, create data collection procedures, timelines and analytic support.

Describe how data and evaluation capacity support program goals, including priorities
identified in consultations with impacted communities during program design.
Explain how grantees can/must use funds to support evidence-based practices.
Explain whether and how grantees can use funds — including braiding funds across
federal agency programs — to support integrated data and evaluation capacity.
Give examples of how current or past grantees have used grant dollars to support
integrated data systems, evaluation and customer service.
Offer examples — whether actual or aspirational — of when and how your agency might
waive performance reporting requirements that are not necessary due to innovative
approaches, higher-quality outcomes data or other scenarios.





	•	ring requirements that are not necessary. See § 200.329(b) and § 200.329(g).
		Focus reporting requirements on information that, in addition to supporting federal oversight, will also add value to the practical implementation of grantees' projects.
		Allow applicants to propose reporting and accountability elements that best leverage their data infrastructure, other critical analysis, and/or evaluation of their project.
		Work with grantees to identify reporting requirements that could be waived in favor of more insightful information that their data and analytic capacity or evaluation activities could provide with less burden.
5	encou	dinate across federal agencies during program planning and design. OMB rages agencies to work together on program design, particularly where the goals and tives of programs or projects align. See § 200.202(b).
	٥	Use existing interagency committees, coordinating structures, or initiatives (including input from applicants) to identify partner agencies and programs that serve similar populations and/or have aligned goals and objectives that would be best served by grantees having integrated data systems.
		Work with partner agencies to identify complementary data, evidence, and evaluation needs or requirements — or work actively to align needs and requirements — to help grantees focus on collecting and using data for greatest impact across programs.
		Align NOFO priorities, language, timing, and technical assistance across programs to help applicants identify and braid funding that can play a complementary role in supporting data infrastructure, evaluation and analytical capacity.

SIMPLIFICATION AND BURDEN REDUCTION

This guide shares two strategies federal agency staff should take to help increase access to and simplify the grants process for grantees, offering concrete steps for each strategy:



- 1 Use plain language in NOFOs.
- 2 Communicate clearly where prior approvals are not needed.
- Use plain language in NOFOs. OMB's implementing guidance M-24-11 Reducing Burden in the Administration of Federal Financial Assistance emphasizes that agencies should use plain language in NOFOs to reduce grant application barriers and burdens. See Appendix I Section(A) 1)(i).

In 2023, the U.S. <u>Department of Health and Human Services instituted a pilot project</u> across bureaus aimed at simplifying and streamlining NOFOs. The Administration for Children and Families at HHS has already found that their NOFO prototypes took 31 percent less time to complete on average, among other positive results.

- Limit page length by including only necessary information and linking to supplemental information.

 Look for ways to use simple, clear language that increases readability. See https://www.
- plainlanguage.gov/ for more information.
- Communicate clearly where prior approvals are not needed.
 - During and after the award process, make clear to grantees that prior approval is unnecessary for costs already included in the project narrative and budget approved in the federal award process (§ 200.308).
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Results for America's <u>Guide for Clear Outcomes</u>, <u>Evaluation</u>, <u>and Evidence Language in Federal Notice of Funding Opportunities</u> helps notice of funding opportunities writers and other government personnel involved with grantmaking think through the essential questions staff should ask to help determine program goals, desired outcomes, and anticipated evidence and evaluation use. Based on specific needs and goals, the guide recommends plain language for agencies to use or adapt. RFA developed this guide after reviewing over 200 NOFOs from operating divisions across the Department of Health and Human Services (HHS) to identify best practices and clarify terms and concepts.



Emphasize that prior approval is no longer necessary for participant support costs
Among other things, these costs can include stipends paid to community members
participating in an outreach program or providing input (§ 200.456).

COMMUNITY ENGAGEMENT AND CUSTOMER EXPERIENCE

This guide shares five strategies federal agency staff should take to help grantees strengthen community engagement and customer experience, offering concrete steps for each strategy:

- 1 Prioritize community feedback in program design.
- 2 Ensure that performance reporting and evaluations capture community-identified priorities.
- 3 Emphasize the importance of community engagement by agencies and grant applicants in NOFOs.
- 4 Offer pre-award technical assistance to explain expectations for community engagement.
- 5 Provide NOFOs, technical assistance, and related materials in additional languages beyond English — and allow grant applications and reports in other languages.
 - **Prioritize community feedback in program design.** The guidance calls on agencies to consult with relevant communities when developing programs. See § 200.202(a)(5). It also asks agencies to encourage grant applicants to engage impacted communities when developing program or project proposals. See § 200.202(b).

The Family and Youth Services Bureau at the U.S. Department of Health and Human Services released a February 2024 Information Memorandum <u>"Leading in Partnership with Youth and Young Adults"</u> about how to include young people with lived experience into program design, implementation, and evaluation. The memo, which applies to grantees of multiple divisions and programs within the bureau, also clarifies that grant funds may be used for these purposes.

The U.S. Department of Transportation, Federal Highway Administration NOFO for the <u>Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation</u> (PROTECT) program includes public engagement, partnerships, and collaboration as a merit criterion. DoT rates applications based on specific proposed practices to ensure meaningful public engagement, partnering, and collaboration,



disadvantaged populations or communities. Identify program goals and objectives that explicitly address the top priorities identified by community members, including the concepts and language they use. Explain in program materials how the design reflects community input. Where feasible, share back with communities how their input shaped program design and seek feedback on the process. Allow time in the application process for prospective applicants to engage communities in designing their proposals. **Emphasize that grant-related materials can be provided to and submitted by applicants** and grantees in languages other than English — and provide a clear, timely process to request translated materials. Clarify when and how community engagement and participant support costs are allowable, and make sure that award amounts provide for these key functions. Ensure that performance reporting and evaluations capture community-identified **priorities.** Performance measurement should reflect the goals and objectives set for the program during the design phase, which should include input from members of communities impacted by the program. In addition to capturing recipients' progress, reporting and evaluation help to identify promising practices and build the evidence base that informs agency decisions. See § 200.301. Consider performance measures that address the priorities and perspectives of impacted communities in order to support learning and outcomes in these areas. Incorporate community-identified priorities and perspectives into federally funded evaluations. Emphasize the importance of community engagement — by agencies and grant applicants — in NOFOs. See the OMB Uniform Grants Guidance NOFO template in Appendix I.

including a wide range of partners. The engagement process is to demonstrate inclusion of



The U.S. Department of Commerce's Economic Development Administration's <u>Recompete Pilot Program NOFO</u> requires grant applicants to describe how the proposed project will provide for inclusive community engagement, and includes this as part of the evaluation criteria for the grant award.

Executive Summary. Because this brief section includes only core information, using it
to encourage applicants to engage community members will underscore its importance.
See Appendix I Section(b)(1)(i)(H).

- **Program Description.** Community engagement can be meaningfully incorporated into multiple parts of this section. See Appendix I Section(b)(3)(i) paragraphs (B) through (G) for these required sections.
 - **Agency funding priorities or focus areas.** Do these areas clearly reflect the input agencies received during community consultations? Do they include community engagement by applicants or grantees?
 - Program goals and objectives. Are these aligned with priorities and perspectives shared with the agency during community consultations? Do the goals and objectives include supporting community engagement by applicants or grantees?
 - Description of how the award will contribute to achieving the program's goals. How will awards advance the priorities and perspectives shared in community consultations? How can grantees use funds to support further community engagement?
 - Expected performance goals, indicators, targets, baseline data, data collection, and other outcomes the federal agency expects recipients to achieve. Do performance measures address the priorities and perspectives of impacted communities in order to support learning and outcomes in these areas? How can funds be used to support community engagement and participation needed for these purposes, including participant support costs and any potential pre-award costs (§ 200.456 and § 200.458)?
 - **Unallowable costs.** Are there any costs related to community engagement or similar activities that are unallowable?

See Appendix I Section(b)(3)(ii) paragraphs (A) and (B) for these optional sections.



- Program history. How has community engagement informed the program's design or evolution?
- Past project examples. How has community engagement looked in past successful projects, or how have grantees used program funds to support these functions and activities in key ways?
- **Application Review Criteria.** Because review criteria help determine which applications are funded, they send one of the strongest signals about what the program and agency value. See Appendix I Section (b)(6)(ii) and how can the extent to which community engagement has informed applicants' proposals be included in review criteria?
- Offer pre-award technical assistance to explain expectations for community engagement.
 - Explain whether engagement is required or optional for developing an application and how it should inform applicants' proposals.
 - Offer examples of how high-quality, authentic engagement looks, including from successful applicants in the past.
 - Share how community engagement will factor into merit review.
 - Clarify expectations for community engagement post-award and how grant funds can be used.
- Provide NOFOs, technical assistance, and related materials in additional languages beyond English and allow grant applications and reports in other languages where feasible and relevant. Agencies have discretion to produce materials in multiple languages where translations may help grow the applicant pool or support participation by specific communities. Making materials available in other languages can significantly increase the ability of organizations and communities where English is not the predominant language to participate in federal programs and help achieve their goals. See § 200.111.
 - Use a variety of sources to determine which languages will be most effective at increasing applicant pools and reaching prospective applicants that would otherwise



impacted communities, input from regional offices, and information from organizations that represent or serve states, localities, tribes and territories. Create an outreach strategy to make sure that alternate-language resources reach the communities and organizations that can best use them. Track uptake of materials and opportunities in languages other than English to inform ongoing outreach. Work closely with grantees to identify and support needs to receive or submit materials in languages other than English, both for their current projects and to support prospective applicants and grantees.

face barriers to entry. Examples include demographic information, consultation with