

How Local Governments Can Use the Updated Federal Uniform Grants Guidance to Support Evidence-Based Policy and Spending

October 2024

Leading cities and counties are already improving resident outcomes by defining, prioritizing and funding evidence-based policies and programs. The U.S. Office of Management and Budget recently released [updated Uniform Grants Guidance](#), which clarifies ways that local governments and other grant recipients can invest federal dollars in data and evaluation activities and capacity. From staffing to systems, these clarifications offer flexibility that can help your city or county leverage federal funds to build data and evaluation capacity and advance evidence-based policy and spending.

WHAT IS THE U.S. OFFICE OF MANAGEMENT AND BUDGET'S (OMB) UNIFORM GRANTS GUIDANCE?

OMB's Uniform Grants Guidance sets the foundational requirements for federal agencies as they make grants and provide other forms of financial assistance, such as cooperative agreements and loans. While individual grants still have specific requirements, the Uniform Grants Guidance lays out “least common denominator” rules, requirements and definitions that apply almost universally. The full guidance, explanatory [Reference Guides](#) and other resources are available on [CFO.gov](#).

This brief shares three actionable strategies to help cities and counties leverage federal funds to:

- 1 | [Support data and evaluation capacity, including staff and systems.](#)
- 2 | [Implement evidence-based programs and practices.](#)
- 3 | [Engage their community.](#)

It also offers [best practices](#) to begin using the updated guidance in your city or county. Whether your jurisdiction has significant experience with evidence-based policy and spending or is just beginning, the strategies and steps below can help you make the most of federal funding.

STRATEGIES FOR HOW LOCAL GOVERNMENT CAN LEVERAGE FEDERAL FUNDS

1

Support data and evaluation capacity, including staff and systems. Unless a program contains unique restrictions, federal grant funds may be used for data and evaluation activities, as long as the activities are relevant to the grant. To secure federal funds for these purposes, describe specific activities for data and evaluation in your federal grant application, and include the necessary funds in your proposed budget. Including data and evaluation as part of your grant proposal helps to identify resources in advance, which reduces the need to scramble to find funds or navigate difficult trade-offs after the project is approved.

FEDERAL EXAMPLE: REBUILDING AMERICAN INFRASTRUCTURE WITH SUSTAINABILITY AND EQUITY (RAISE) PLANNING GRANTS

These U.S. Department of Transportation (DOT) planning grants call for an assessment of environmental sustainability, including addressing the “disproportionately negative environmental impacts of transportation on disadvantaged communities.” The Uniform Grants Guidance allows grant funds to support data systems—such those needed to measure environmental impacts—and staff capacity to administer or improve relevant programs. In addition, funds may be used for evaluation, such as to [assess the quality or impact of local workforce development programs](#) that may be partners in implementing infrastructure projects.

To take action, cities and counties can propose to use grant funding for:

- **Data, analysis and evaluation staff.** Federal funds can pay for the staff—whether in-house or contractors—needed to implement data and evaluation-related activities. The box below shows OMB’s updated language on the activities that funds can pay for, from gathering, storing, and securing data to analyzing, sharing, and publishing it. This means that federal grants can pay for local government staff time that supports relevant performance activities, which are discussed below. Even if an activity isn’t listed, it may still be allowable. Consult the federal agency providing the grant to find out.

HOW MAY FEDERAL GRANT FUNDS BE USED FOR DATA AND EVALUATION?

The 2024 Uniform 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.”

- **Evaluations.** Federal funds can support both an in-house or contracted evaluation. The evaluation may be specific to your project or cover a larger scope of which your project is a part. For example, a project on high-quality middle school tutoring may look specifically at program outcomes or may participate in a larger evaluation that looks at high school achievement across a variety of factors.
- **Integrated data systems (IDS).** Federal funds can be used for the initial build of an IDS as well as incremental or ongoing costs related to a particular grant. Costs might include designing and testing a system or launching an initial “backbone” system into which other data will be integrated over time, as well as ongoing costs to operate an IDS. Allowable costs can include collecting, storing, analyzing, sharing or publishing data and information as well as for personnel, contracts, security and privacy activities and other administration.
- **A single data system.** Even if your systems are not integrated across programs, federal funds can still support the activities listed above. Funds might pay for case management systems, dashboards for serving clients or monitoring outcomes, and other administrative system costs relevant to the grant. Data systems that operate in a silo generally do not offer the same level of insight and support for decision-making

and outcomes tracking as integrated systems. For this reason, using funds to integrate data and data systems is strongly recommended.

- **Performance management and reporting.** Federal funds can pay for a variety of activities related to performance management. For example, funds could pay for data collection and analysis for continuous quality improvement purposes, for dashboards that help track performance or manage program operations, or for publishing performance information to the public.

LOCALITIES IN ACTION: KING COUNTY'S INVESTMENT IN DATA SYSTEMS AND EVALUATION

King County, Washington, leveraged federal pandemic relief funding to invest in data systems and evaluation for the [Eviction Prevention and Rent Assistance Program](#) (EPRAP). Alongside state and local funds, a portion of federal funds supported new evaluation staff to lead the work as well as data systems that helped the County establish housing stability metrics.

2

Implement evidence-based programs and practices. Define what evidence means for your jurisdiction, and direct federal funds into evidence-based programming.

WHAT DOES OMB SAY ABOUT EVIDENCE-BASED PROGRAMS AND PRACTICES?

When it released the updated Uniform Grants Guidance, OMB also issued an implementing memo ([M-24-11 Reducing Burden in the Administration of Federal Financial Assistance](#)) that emphasizes the importance of evidence-based practices in competitive grants. This memo specifically instructs federal agencies to “consider prioritizing Federal awards to applicants that propose evidence-based practices” in grant competitions.

As a result, cities and counties that propose evidence-based strategies may receive stronger consideration based on the process and criteria laid out in individual grant announcements. Results for America has identified a total of [98 federal grant programs at 11 federal agencies](#) and [79 state grant programs at 57 state agencies](#) that already invest in what works by defining and prioritizing evidence of effectiveness.

To take action, cities and counties can:

- **Define what “[evidence](#)” means for your city, county or agency.** In certain programs, [federal agencies provide definitions of evidence](#) for grantees to use. At the same time, [leading localities are adopting their own definitions](#) to bring clear, consistent standards to policy and program decisions.



Creating definitions prepares your locality to compete for grant opportunities that require or prioritize evidence-based interventions. Need help crafting a definition? See [Results for America’s Evaluation Policy Guide chapter on Defining Evidence of Effectiveness](#).

- **Propose evidence-based activities in federal grant applications.** Describe how your proposed activities are backed by evidence, how they fit into your overall approach to evidence-based policy and programming, and how they relate to evidence standards the federal program may have. In some cases, a grant program may require you to use a program or approach that appears in an evidence-based clearinghouse.

Even if a federal grant announcement does not require or prioritize evidence-based proposals, using your jurisdiction’s definitions and framework for evidence can help to build and reinforce a culture of evidence, align programs, and strengthen your grant application. See Results for America’s [Building a Culture of Evidence and Evaluation](#) for more insights.

FEDERAL EXAMPLE: CHILDREN’S MENTAL HEALTH INITIATIVE GRANTS FROM THE SUBSTANCE ABUSE AND MENTAL HEALTH SERVICES ADMINISTRATION (SAMHSA)

There are a growing number of federal grants that require the use of evidence-based programs. For example, the FY2023 grant announcement for SAMSHA’s Children’s Mental Health Initiative required applicants to provide evidence-based and culturally appropriate mental health services to children, youth, and young adults with severe emotional disturbance or at risk, including across diverse demographic groups.

LOCALITIES IN ACTION: SAN ANTONIO'S EQUITY MATRIX

An important part of identifying relevant evidence-based approaches for your community is understanding the needs and demographics across your jurisdictions. In San Antonio, Texas, the [Equity Matrix and Demographic Indicator Maps](#) help promote data-informed decisions that address disparities across a variety of indicators and improve access to opportunity for all San Antonio residents.

3

Engage your community. Community engagement is a cornerstone of understanding and meeting your residents' needs. The revised Uniform Grants Guidance supports these efforts by:

- Encouraging community engagement by grant applicants.
- Allowing grantees to pay for “participant support costs” related to community engagement activities—like stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care and per diem—without seeking prior approval.

FEDERAL EXAMPLE: SAFE STREETS AND ROADS FOR ALL (SS4A) PLANNING GRANTS

These U.S. DOT grants require robust community engagement with frontline stakeholders to ensure safety action plans meet local needs. OMB's updated Uniform Grants Guidance makes this easier. Grant funds can pay for “participant support costs” like stipends and temporary dependent care without going back to the federal agency for approval once you have the grant.

To take action, cities and counties can:

- **Propose community engagement activities in your grant application.** Describe how engagement will support your project goals and benefit impacted communities.
- **Include community engagement activities in your proposed budget.** Make sure to include the cost of the community engagement activities you propose in your budget—both administrative expenses and participant support costs.

- **Reach out to federal agencies about non-English materials where language poses a barrier for organizations and communities in your city or county.** Barriers could include applying for grants, participating as a subgrantee or efficiently administering existing grants. This may be most relevant in cases where your locality relies on community-based partners to provide services to individuals and groups who speak languages other than English.

LOCALITIES IN ACTION: KANSAS CITY EARLY INTERVENTION COMMUNITY COURT

In 2022, Kansas City, Missouri, received over \$500,000 from the U.S. Department of Justice to design a community court that has the active support and confidence of community members. This early intervention approach for youth and first-time offenders is designed to strengthen community engagement and help to address underlying issues that lead to criminal behavior. A planning team including neighborhood residents, business owners, clergy leaders, the mayor, city administrator, city prosecutor, court administrator and social service agencies committed to host open community meetings, review feedback, and study best practice programs. In addition, Kansas City also began a research-practice partnership to support learning and evidence-building through the project.

BEST PRACTICES TO GET READY TO USE THE UPDATED UNIFORM GRANTS GUIDANCE IN YOUR CITY OR COUNTY

1. **Lay the groundwork for data and evaluation.** Implementing data and evaluation activities takes relationships, trust, and understanding—which all take time. The best practices below can help you get started before the clock starts ticking to submit a particular grant application.
 - **For individual agencies and programs, coordinate in advance across offices responsible for program, data, and evaluation.** If you work in a program office, reach out to colleagues and offices responsible for data collection, sharing, analysis, and evaluation. Learning about foundational data, evaluation and evidence-based work and priorities—including governmentwide data standards and evaluation policy—in advance of a federal grant announcement will make it easier to talk about bandwidth, budget, and other resources for specific projects and proposals.

LOCALITIES IN ACTION: TEMPE'S EVALUATION POLICY

The City of Tempe, Arizona, is committed to using evaluations to improve programs, policies, or services to provide better outcomes for the community. Its [evaluation policy](#) establishes guidelines and guiding principles to create a culture of evaluations that are high-quality with results that inform decisions and are shared with internal and external partners.

- **At the government-wide level, engage senior leaders with decision-making authority for data, IT systems, and budget.** Integrating data sets and systems takes time, trust, and planning—and offers significant payoff through actionable insights. Engaging senior leaders is critical to setting a vision and goals for how data and evaluation can serve the whole city or county. Senior leaders may include agency heads, Chief Data Officers (CDO), Chief Information Officers (CIO), and Budget Directors. This engagement can help to create a framework that makes it easier to engage staff from CDO, CIO, and budget offices to develop specific grant proposals.

2. **Plan for community engagement.** Community engagement is not a one-size-fits-all activity.

Carefully considering whether, when, and how to conduct community engagement is an important step. Below are factors to consider, both for specific grant proposals and for longer-term planning:

- **Will engagement produce relevant information that you can act on?** Engagement that does not lead to action or clearly influence decisions can erode trust with communities.
- **Can other recent or planned community engagement inform your work?** Consider whether data and insights that affected residents have already provided or may soon provide through a separate effort may also support your project.
- **Can other agencies or partner organizations help?** Help could include leveraging existing engagement efforts, coordinating and streamlining activities, or informing whether and how to conduct engagement.