

FY 2012 Citizenship and Integration Grant Program Questions and Answers

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About the Grant Program

1. What is different about this year's grant program?

There are several important changes to this year's grant program:

- Current awardees under FY 2011 Citizenship and Integration Grant Program funding opportunities DHS-11-CIS-010-003, DHS-11-CIS-010-002 and DHS-11-CIS-010-001 may **not** apply because the FY 2011 two-year period of performance will not expire before the start of the new program.
- Applicants may request a maximum grant award of \$160,000.
- USCIS will not offer the National Capacity Building grant program.
- USCIS will not offer the Citizenship Instruction Only Direct Services grant program.
- Applicants must propose citizenship preparation programs consisting of both citizenship instruction and naturalization application services components. Partnerships between organizations that provide citizenship instruction and organizations that provide naturalization application services are encouraged.

2. Last year USCIS awarded approximately \$9 million in grant awards. Why did the total award amount decrease to \$5 million this year?

Since its creation, USCIS has received appropriations for the grant program. In FY 2009 USCIS awarded 13 organizations a total of \$1.2 million. In FY 2010 nearly \$8.1 million went to 56 organizations. In FY 2011 USCIS granted approximately \$9 million to 42 organizations. In FY 2012, however, Congress authorized USCIS to continue the grant program using fee revenue. In an effort to balance the importance of the grant program to USCIS' civic integration mission with the impact a fee-funded program would have on our applicants and petitioners, USCIS will make an investment of \$5 million to continue the program in FY 2012.

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Eligibility

1. Are partnerships allowed?

Yes, partnerships are allowed and encouraged. A partner organization is considered a “sub-awardee” if the organization will receive a portion of the grant funding to provide additional or complementary direct services. If a sub-awardee is proposed, the applicant **must** provide the citizenship instruction. The sub-awardee may provide additional citizenship instruction, naturalization application services, or both. The applicant must complete a Memorandum of Understanding (MOU) with the proposed sub-awardee. The applicant must show how it will 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 and will be responsible for financial reporting.

2. My organization applied for the Citizenship Instruction Only grant program in previous years, but that program is not offered this year. Is there any way my organization can still apply?

If your organization has recent experience providing citizenship instruction, but not naturalization application services, your organization is not eligible to independently apply. In order to be eligible to apply, your organization will need to find a qualified partner that meets the eligibility criteria to provide the naturalization application services.

3. Are current National Capacity Building Grant Program sub-awardees allowed to apply for the FY 2012 funding opportunity?

Current National Capacity Building Grant Program sub-awardees may apply for the FY 2012 funding opportunity only if their period of performance ends on or before September 30, 2012.

4. Are applicants required to be recognized and/or accredited by the Board of Immigration Appeals? If so, how does our organization prove BIA recognition?

Applicants and any proposed sub-awardees must either: (1) Be recognized by the Board of Immigration Appeals (BIA) and have a BIA accredited representative on staff who provides or supervises the naturalization application services; or (2) Have an attorney on staff who provides or supervises the naturalization application services. It is not required to provide proof of BIA recognition or accreditation in order to apply. A 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.

5. My organization does not yet have BIA recognition. Can we apply and obtain BIA recognition during the first year of the program?

At the time of application, applicants must have either (1) BIA recognition and BIA accredited staff, or (2) an attorney on staff. In addition, applicants must have demonstrated recent experience providing naturalization application services within the scope of the authorized practice of immigration law. An organization that does not yet have BIA recognition could apply if an attorney on staff is available to provide or supervise the naturalization application services prior to BIA recognition.

- 6. Are both the principal applicant and proposed sub-awardees required to have BIA recognition?**
Only the organization that proposes to provide naturalization application services is required to have either (1) BIA recognition and BIA accredited staff, or (2) an attorney on staff.
- 7. Can my organization use a volunteer attorney to provide the naturalization application services?**
Volunteer attorneys may be used to provide naturalization application services. Please note; however, that the requirement that an attorney or BIA accredited representative be on staff must still be met and a G-28 form must be completed and submitted with each N-400 filed.
- 8. Can my organization partner with an individual attorney?**
Individual attorneys may not apply for this funding opportunity either as principal applicants or as a sub-awardee.
- 9. The funding announcement requires that applicants demonstrate recent experience providing citizenship instruction and naturalization application services. How does USCIS define “recent”?**
USCIS will consider experience within the last five (5) years to be recent.
- 10. My organization has experience providing a variety of legal services, which occasionally includes naturalization services. Does this count as recent experience?**
If your organization has provided naturalization application services in the past five (5) years, that would be considered recent experience.
- 11. My organization has experience providing citizenship classes for low-level students, while our partner will provide a wider array of citizenship instruction. Does it matter how much of the citizenship instruction the principal applicant provides?**
The principal applicant must provide citizenship instruction, while the proposed sub-awardees may provide additional citizenship instruction. There is no requirement on the amount of instruction the principal applicant must provide relative to the amount provided by a partner.
- 12. Do applicant organizations need to demonstrate 501(c)(3) status or is it acceptable to simply be a non-profit organization?**
It is not necessary to have 501(c)(3) status. However, to be eligible, you must provide proof of public or non-profit status as defined in Section IX.8 of the funding announcement.
- 13. Can an organization with pending 501(c)(3) status apply?**
Prior to submission of an application, applicants must have proof of public or non-profit status, as described in Section IX.8 of the funding announcement.
- 14. Is the applicant required to have a certified instructor to conduct the citizenship classes?**
It is the applicant’s responsibility to demonstrate that staff members are qualified to provide citizenship instruction. Applicants will be assigned a score based on their qualifications and experience. See Section V of the funding announcement.

15. Do individuals providing citizenship services to immigrants qualify as eligible applicants?

No.

16. Are for-profit entities eligible to apply?

No.

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Grant-Funded Activities

1. Can my organization propose to provide general English as a Second Language (ESL) classes or Adult Basic Education under this funding opportunity?

Grant funding is available for citizenship instruction to prepare permanent residents for naturalization. Citizenship instruction must prepare permanent residents for the civics (U.S. history and government) and English (reading, writing, and speaking) components of the naturalization test. Applicants may not propose to use grant funds for other types of instruction.

2. Is my organization allowed to charge a fee for services?

Applicants are allowed to propose a fee for citizenship instruction and/or naturalization application services, however, the fees must be nominal. The project narrative and budget should include the amount proposed and explain why this fee is necessary within the program structure. The applicant must also show how the fees will be used to support the grant-funded program.

3. What does USCIS consider to be a reasonable fee to charge for services?

If the applicant proposes to charge a fee for services, the fee must be nominal. USCIS does not provide specific guidance on the appropriate amount. Applicants must explain why this fee is necessary to the program design and how the income generated from fees will be used for the citizenship preparation program.

4. Can grant funds be used to pay the costs associated with BIA recognition and accreditation?

Yes. However, at the time of application, applicants must be BIA recognized and have a BIA accredited representative, or have an attorney, who provides or supervises the naturalization application services. Applicants may use grant funds to pay for additional staff members to pursue BIA accreditation. If the applicant proposes to work with a partner organization and the applicant provides only citizenship instruction, the applicant may use grant funds to pay the costs associated with BIA recognition and accreditation.

5. Must individuals receiving grant-funded services be permanent residents or can they have any legal immigration status?

Individuals receiving services under this grant program must have the status of lawful permanent resident (LPR). Applicants must demonstrate how they will verify and document that only permanent residents will receive grant-funded services.

- 6. The funding announcement states that organizations must provide services to permanent residents only. If our organization also serves other immigrants, should we place permanent residents in a class by themselves?**
Organizations must adequately demonstrate that *only permanent residents* will receive services funded by the grant. Applicants must demonstrate how they will ensure that they are using grant funds to serve only permanent residents.
- 7. How many permanent residents should receive services for the funds and time allotted?**
USCIS does not require that a specific number of permanent residents receive citizenship preparation services. Applicants should rely on their own experience to set goals that are achievable for their respective organization.
- 8. Can organizations use volunteers to provide services? How would USCIS like to see organizations using volunteers?**
Yes, applicants are encouraged to use volunteers to provide services. It is up to the applicant to decide how to make the best use of volunteers.
- 9. Can organizations limit services to one ethnic, religious, or language group they currently serve?**
No. Eligible participants must be served regardless of their ethnic or religious backgrounds or the language they speak.
- 10. The funding announcement states that applicants may not limit services to a particular ethnic or language group, but applicants are required to describe a targeted underserved permanent resident group that they serve. Please explain.**
Applicants often have a particular underserved population in their community that they serve; however, applicants may not limit services to one population. Applicants must provide services to all permanent residents who seek services.
- 11. Is my organization expected to have the capability to provide services in every language?**
Applicants are not expected to have the capability to provide services in every language. If your organization is unable to help a permanent resident because of language limitations, your organization should have a referral process in place.
- 12. My organization serves permanent residents who are eligible to take the naturalization test in their own language. Are applicants allowed to use grant funds to provide services in languages other than English?**
The objective of the grant program is to support permanent residents on their path to citizenship. Applicants may provide services in other languages to permanent residents who are exempt from the English language requirement, but the primary focus of the program should be to provide services to permanent residents who need assistance preparing for the English and civics portions of the naturalization test.
- 13. My organization serves low literacy students who require a significant amount of class time before they are ready for their naturalization interview. Is the objective of the program to help people become citizens or to teach English?**
The objective of the grant program is to support permanent residents on their path to citizenship. USCIS expects that citizenship instruction under the program will be focused

on English comprehension, vocabulary, grammar, and content needed for the naturalization test.

14. Does adjustment of status count as a legal service that applicants can provide under this grant program?

Applicants must propose to use grant funds to provide legal services to support permanent residents with the naturalization application and interview process. Services may include naturalization eligibility screening and advice, Form N-400 preparation and submission, and interview preparation. Those applying for adjustment of status are not permanent residents and may not receive services under this grant.

15. My organization serves permanent residents with mental disabilities. We file Form N-648, Medical Certification for Disability Exceptions for many of these individuals. Is this an allowable service under the grant program?

Yes. Organizations may provide assistance to permanent residents to complete Form N-648 under this grant program.

16. Under “Eligible Funding Purposes” on page 6, the funding announcement states that the USCIS Office of Citizenship must approve materials and resources that are developed for use in classes. Does this mean that the USCIS Office of Citizenship has to approve our curriculum?

This refers to applicants who propose to use grant funds to create supplemental educational materials or resources during the grant performance period. This does not apply to the curriculum. The curriculum must already be developed and in place before the start of the grant period.

17. May applicants provide citizenship instruction and naturalization application services through other funding sources? The other funding sources will likely end during the first year of the grant program.

Applicants must clearly describe how USCIS grant funds will be used to expand or improve upon the existing program. Applicants must also be able to distinguish between services that are funded by the USCIS grant and services that are funded by other sources.

18. My organization is interested in focusing efforts on collaboration among service providers in our area. Is this allowable under the grant program?

The primary focus of the grant program is to provide direct services. Applicants may collaborate with local service providers, but grant funds must primarily support the provision of direct services to permanent residents.

19. Are the grants a one-time opportunity, or will there be a chance for grantees to renew the funding?

The performance period is two years. There is no option to renew funding after two years.

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Application

- 1. Is there a format for the Memorandum of Understanding (MOU)?**
There is no required format. The MOU must be signed by all parties. The MOU should clearly describe the scope of work to be performed, roles, responsibilities, and agreed upon activities, including remuneration, and other terms and conditions that structure or define the relationship (e.g., in-kind services, dollars, staff, space, equipment, etc.).
- 2. Should organizations submit an MOU for individual volunteers?**
The MOU is required for any formal agreement between the applicant and another organization. MOUs are not required for individual volunteers.
- 3. Can my organization submit more than one application?**
No. Organizations can submit only one application. If an organization submits multiple applications, prior to commencing review, USCIS will contact the organization to confirm which application the organization wants to include in the review process. The other application will not be reviewed.
- 4. Can my organization be a lead applicant on one application and a sub-awardee in another application?**
Organizations may only be included on one application.
- 5. My organization has an office in one state and a sub-office in another state. Can we submit one application that will include both offices?**
Yes. Organizations may provide services in more than one state under this grant program.
- 6. Can a partner organization be listed on multiple applications?**
Yes. However, USCIS reserves the right to contact all organizations included in the application prior to making an award.
- 7. If my organization submits an application with a partner, does it matter who is the lead organization (i.e. principal applicant)?**
The principal applicant must provide citizenship instruction.
- 8. Can we submit letters of support?**
The funding announcement states that no other documentation should be submitted other than what is requested. USCIS will not consider letters of support.
- 9. Are sub-awardees required to have a DUNS number?**
Yes.
- 10. Is my organization required to submit a class outline for each class?**
Applicants are required to submit a class outline for each class that is contemplated under this grant program.

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Budget

- 1. Are we required to submit both a budget narrative and a budget table?**
Yes. The budget table is a new requirement for FY 2012. For more information, see Section IX.4 of the funding announcement.
- 2. In our application, my organization proposes to work with several partners who will provide additional direct services and receive a portion of the grant funds. Should my organization submit one combined budget narrative or separate budget narratives?**
The applicant must submit a budget narrative and table for the applicant and a separate budget narrative and table for each sub-awardee (i.e. a partner who will receive a portion of the grant funds to provide additional or complementary direct services). Please provide the same level of detail for all budget narratives and budget tables.
- 3. My state has several sub-contractors who provide direct services. Can we apply as a state government and contract out the services?**
Applicants may not act solely as a pass-through for grant funds. The primary applicant must provide direct services.
- 4. Is sub-contracting permitted?**
Organizations may propose to sub-contract specific tasks, such as hiring additional citizenship instructors on a contractual basis. However, the applicant must directly manage the citizenship instruction and must demonstrate its ability to successfully manage all aspects of the grant-funded project, including financial management.
- 5. Which budget category includes facility rental costs?**
Facility rental costs should be included under “Other Direct Costs” (see Section IX.4 of the funding announcement). Facility rental costs should not exceed more than 20 percent of the total approved budget.
- 6. Which budget category does USCIS consider to be more important: instructional material costs or salary costs?**
There is no formula for how to best distribute these costs. When developing the budget for this application, applicants should include costs that are reasonable and appropriate for the organization and that support the proposed program design.
- 7. How does my organization demonstrate its approved fringe benefit rate?**
If a fringe benefit has been negotiated with, or approved by, a cognizant federal agency, please 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, taxes, etc. Identify the base for allocating these fringe benefit expenses. See Section IX.4.c of the funding announcement.
- 8. Can organizations apply for less than the maximum award amount?**
Yes.

9. If my organization already receives state funding for our citizenship program, are we required to show how the grant funding will not be duplicative of our other funding?

Applicants must explain how USCIS grant funding will be used to expand or improve upon existing services. Applicants must show how they will separate USCIS grant-funded services from other funding sources.

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Evaluation

1. Will USCIS look more closely at organizations who have limited resources as opposed to organizations with substantial resources that do not necessarily need additional funding?

An organization's net worth is not one of the evaluation criteria for the Citizenship and Integration Grant Program.

2. My organization is in a rural area. Does our location affect the likelihood that we will be funded?

As explained in the funding announcement, USCIS may consider geographic balance as a program balance factor when making final funding decisions. Regardless of geographic location, applicants should carefully explain the need for services among the permanent resident community in their service area.

3. What are the points by which applicants will be judged?

The evaluation criteria and corresponding point values are found in Section V of the funding announcement.

4. How can Citizenship and Integration Grant Program applicants obtain feedback about their application so that they are better prepared to apply in the future?

After the public announcement of this year's grant recipients, unfunded applicants may request a written summary evaluation and score breakdown by sending an e-mail to: citizenshipgrantprogram@dhs.gov. Results will be sent to the requesting organization within 60 days from the date the written request is received.

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