

Equity-Based Guidelines to Increase Access to and Encourage Participation in Grant Opportunities by Historically Black Colleges and Universities and Institutions Serving Students of Color

September 2023



BACKGROUND

The Social Security Administration (SSA) published its FYs 2022–2026 Agency Strategic Plan (ASP) in March 2022. The ASP includes a new Strategic Objective, “Identify and Eliminate Potential Barriers to Access to Contracts, Grants, and Procurement,” which is also an area of focus in SSA’s Equity Action Plan per Executive Order 13985. The ASP identified two key initiatives to help the agency achieve this strategic objective.

This living document captures these two key initiatives and performance measures. SSA will review these key initiatives and performance measures annually and adjust them as necessary.

We will report our progress towards achieving this strategic objective annually in SSA’s Annual Performance Plan and Report (APR).

KEY INITIATIVES

1. Provide information and training to all SSA staff with grant-related work duties on best practices to encourage increased applicant diversity for external postings by Historically Black Colleges and Universities (HBCUs) and other Institutions Serving Students of Color (ISSC) in agency grant opportunities.
2. Implement these best practices in each agency grant program.

BARRIERS TO IMPLEMENTATION

Based on discussions with representatives from various HBCUs and other ISSCs, SSA identified the following barriers to accessing SSA grant funds:

- Lack of or new relationships between SSA and HBCUs and other ISSCs; and
- Confusing language about eligibility requirements.

AGENCY ACTIONS TO OVERCOME BARRIERS

We developed the following guidelines to overcome these barriers and support the agency in achieving its goals of ensuring consistency across competitive grant program funding opportunity announcements and to promote equity-based guidelines to increase HBCUs and other ISSCs awareness of and participation in grant opportunities.

1. Outreach Activities

During the program development stage and preparation of Notice of Funding Opportunity (NOFO), project officers must develop an outreach plan, including outreach to HBCUs and other ISSCs. For example, the outreach plan may include holding information sessions and sending “Dear Colleague Letters,” which will notify potential applications of the opportunity and encourage participation. We document our outreach plan to ensure that we reach HBCUs and other ISSCs.

2. Other Outreach Activities and Relationship Building Opportunities

We will seek outreach opportunities at conferences and job fairs where we can market various grant opportunities to HBCUs and other ISSCs. This engagement will facilitate dialogue with representatives from HBCUs and other ISSCs. These outreach opportunities will enable SSA staff to build relationships with HBCUs and other ISSCs. To this end, SSA will encourage communication by including points of contact in all Notices of Funding Opportunities (NOFOs) and grant program websites. We will hold information sessions for all research competitions and advertise those sessions on our website and in the Department of Education’s weekly HBCU Initiative Newsletter. The information sessions to discuss the programmatic aspects of the grant opportunities, and the administrative aspect, such as how to apply to grants. To ensure that the information sessions are accessible, we will provide reasonable accommodations such as closed captioning and interpreter services. After each information session, we will post our presentations and any questions and answers to SSA’s website. We will also continue to seek other means to disseminate notices of these outreach opportunities, such as the possibility of direct email contact and listservs.

3. Sub-award Opportunities

Where a research grant may be awarded to a non-HBCU/ISSC, there may be opportunities for collaboration with HBCUs/ISSCs through sub-awards. SSA will include language to encourage the use of HBCUs and other ISSCs in NOFOs and subsequent awards. We will also leverage best practices from other agencies on increasing subawards to HBCUs and other ISSCs.

4. Training of Grant Staff

At least annually, we will provide training for all staff performing grant related work to educate staff on best practices to eliminate barriers in SSA's grant programs. Trainings shall include managers and project officers from across the agency, grants management officers, and grants management specialists. Additionally, staff will continue serving on cross-agency, equity-related workgroups. These meetings afford staff an opportunity to share experiences and lessons learned with the wider federal grantmaking community.

SUMMARY OF SSA'S RESEARCH GRANT PROGRAMS

SSA administers the following three major research programs:

- The Analyzing Relationships between Disability, Rehabilitation and Work Small Grant Program awards \$450,000 annually for a five-year project period to one eligible organization¹ which holds competitions for stipends to graduate-level students. Eligible entities include:
 - Research organizations;
 - Universities;
 - University Centers for Excellence in Developmental Disabilities, Leadership Education in Neurodevelopmental Disabilities programs, Eunice Kennedy Shriver Intellectual and Developmental Disability Research Centers, and similar programs; and
 - Associations of research organizations and universities.
- Under the Interventional Cooperative Agreement Program (ICAP), SSA enters into five-year cooperative agreements with two to three organizations² per year. ICAP recipients can be States, foundations, and other non-federal groups and organizations that can identify, operate, evaluate, and partially fund interventional research related to the Disability Insurance and Supplemental Security Income programs. The cooperative agreements awarded under ICAP are worth up to \$3 million. The following types of entities are eligible to apply:
 - States: The term "State" as defined by the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at title 2 of the Code of Federal Regulations (CFR) Part 200, includes any of a State's agencies or instrumentalities, and the terms "local government" and "federally recognized Indian tribe" shall have the meanings given in the Uniform Guidance and set forth in Appendix I.1, Applicants. (2 CFR 200.54, 200.641)
 - Local governments
 - Federally recognized Indian tribes
 - Foundations – Employer associations
 - Not-for-profit organizations
 - For-profit organizations, such as firms
 - Educational institutions
- The Retirement and Disability Research Consortium (RDRC) is an interdisciplinary extramural policy research program funded with up to \$12 million annually through a cooperative agreement. Every five years, SSA competes this program and awards organizations³ to run a consortium. These consortia, in turn, fund research to full and part-time faculty and graduate students. Eligible entities include universities and other organizations or associations of universities and other organizations. A limited number of individual researchers/ investigators associated with international institutions may be included as key personnel.

SSA added additional language to the NOFO to increase understanding and eligibility requirements to participate in grant opportunities.

In addition, SSA hosted information sessions on grant programs up for competition. This was an opportunity for interested HBCUs and other ISSCs to learn more about the programs and ask questions in an open forum.

1. Only organizations in the United States are eligible to apply.

2. Only organizations in the United States are eligible to apply.

3. Only organizations in the United States are eligible to apply.

1. Language for Inclusion in all NOFO per Appendix I to 2 CFR Part 200 - Full Text of NOFO

Eligibility Section

An eligibility section is required in all NOFOs which clearly identifies the types of entities that are eligible to apply. The following are the types of organizations eligible to apply for SSA grants.⁴

- States and state agencies
- Local governments
- Federally recognized Indian tribes
- Foundations
- Employer associations
- Not-for-profit organizations
- For-profit organizations, such as firms
- Educational institutions

The eligibility section **must also include the following language:**

Institutions Serving Students of Color (ISSCs)

SSA relies on research to learn about the diverse people we serve, how they are affected by our programs, and ways in which we can improve our programs to better serve the public. As such, we recognize the importance of engaging with researchers who represent the diversity of the public. For this reason, SSA strongly encourages all eligible applicants identified under the eligibility section of this announcement, including ISSCs, to apply under this opportunity.

For purposes of this solicitation, the following are considered ISSCs:

1. HBCUs, as defined by the Higher Education Act (20 U.S.C. § 1061(2)).
2. Tribal Colleges and Universities (TCUs), as defined by the Higher Education Act (20 U.S.C. § 1059c(b) (3) and (d)(1)).
3. Hispanic-Serving Institutions (HSIs), as defined by the Higher Education Act (20 U.S.C. § 1101a(a)(5)).
4. Asian American and Native American Pacific Islander-Serving Institutions; (AANAPISIs), as defined by the Higher Education Act (20 U.S.C. § 1059g(b)(2)).

5. Predominately Black Institutions (PBIs), as defined by the Higher Education Act of 2008, 20 U.S.C. 1059e(b)(6).
6. Alaska Native-serving institutions and Native Hawaiian-serving institutions (as defined in section 20 U.S.C. § 1059d(b)); and
7. Native American-serving nontribal institutions (as defined in section 20 U.S.C. § 1059f(b))

We will re-evaluate this language on a regular basis and adjust it based on lessons learned and best practices.

2. Regular Competition and Notice of Funding Opportunity Dissemination

To encourage free and open competition, SSA requires that existing grant programs compete their opportunities every five years. We have one ongoing grant program, ICAP, with an annual competition. We also compete any new grant programs. These opportunities are posted on **Grants.gov**, but we encourage our program offices to identify other outreach opportunities. We will also advertise grant opportunities in the Department of Education's weekly HBCU Initiative Newsletter. The newsletter has a subscription of 35,000 members including HBCU presidents, chancellors, and students. We will continue to reach out to our network of contacts to raise awareness of grant opportunities when we issue NOFOs. We will continue to hold information sessions on grant programs up for competition for interested HBCUs and other ISSCs to discuss the programs in an open forum. After these information sessions we will post questions and answers and other related information session presentations at **Office of Acquisition and Grants (ssa.gov)**.

3. Review Process

SSA strives to use a fair, effective, and objective peer review process to evaluate grant applications. Using a peer review process ensures integrity and helps administrative officers make informed decisions about funding. For smaller competitions, we manage the process in-house. For larger competitions, program officials enter into an Inter-Agency Agreement with Health and Human Services, the owners of **GrantSolutions**, our grants management system. We use their Application Review Module (ARM) services. The review process is configurable by grant program, (e.g., number of panels, number of applications reviewed by each panel, number of reviewers per panel) based on the program needs, but otherwise, the process is the same.

4. Only organizations in the United States are eligible to apply.

- Step 1: Recruit reviewers and organize panels. The program office determines what areas of subject matter expertise are necessary for the review of a specific program’s applications (e.g., SSA Title 16 policy, evaluation methodology). The program office recruits subject matter experts from within the agency and outside the agency, either through professional networks or through the **GrantSolutions** ARM database of subject matter experts. Once the program office recruits reviewers, the office organizes panels so that each panel has the same number of reviewers, and the reviewers cover all areas of necessary expertise.
- Step 2: Assign applications and collect review comments. The program office (or the ARM staff) divides applications among the panels so that each panel has a roughly equal number of applications to review. The panel members review the applications and score the applications individually, based on the scoring criteria set in the notice of funding opportunity. After individual reviews, the review panel meets and provides aggregate scores, consensus reports, and ranking lists to the program office (sometimes through the ARM staff). When practicable, a Grants Management Officer should attend grant application review panel meetings in an advisory capacity and when requested, interpret grants management policy to reviewers.
- Step 3: Capture scores and make recommendations for funding. The program office receives the aggregate scores and consensus reports from the review panels. Based on the review panel feedback, the program office makes recommendations for Commissioner approval.

PERFORMANCE MEASURES

The measure of success will be the number and value of grant awards and sub-awards to HBCUs and other ISSCs. Success can take time. Therefore, we will also measure the attendance of representatives from HBCUs and other ISSCs at our information sessions, the number of outreach events that we attend, and the number of people contacted during these events. Through collaboration with the Department of Health and Human Services and other federal working groups, we will build the capability in **Grants.gov** and **GrantSolutions** to easily extract sub-award data. We will report our measures of success annually in the APR.



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and tomorrow

Social Security Administration | Publication No. 26-005
September 2023 (Recycle prior edition)
Produced and published at U.S. taxpayer expense