

# FY2020 School-Based Mental Health Services Grant Technical Assistance Webinar for Prospective Applicants June 17, 2020 | 2pm ET

## QUESTION AND ANSWER SUMMARY

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On Wednesday, June 17, 2020 the U.S. Department of Education's Office of Elementary and Secondary Education (OESE) hosted a technical assistance webinar to assist potential applicants interested in applying for the School-Based Mental Health Grant Program. A compilation of the responses to questions included in the slides (denoted with an asterisk (\*)) and raised by webinar participants follows.

### Program Priority Questions

**1. Can I collaborate with three agencies collectively—State, Federal and regional?**

The relevant language in the Notice Inviting Applicants (NIA) states that *“Applicants must describe how they intend to collaborate with State, regional, and local organizations...Applicants may also describe proposed coordination with existing federally funded efforts related to elementary and secondary school counseling and mental health promotion.”* Accordingly, while collaboration with State, regional and local organizations is required, coordination with Federal efforts/agencies is optional.

The State, local and regional agencies do not have to be working together with each other and with the grantee. The grantee must be collaborating with each of those entities, but those entities would not necessarily need to be working together.

**2. Are the preference points (15 + 5) utilized in any scoring of applications receiving funding THIS year, or only for subsequent years if they are not awarded THIS year?**

Applications, including the competitive preference priorities, are reviewed and scored as part of this competition. Funds are only awarded after this full review and scoring occurs.

### Application Requirements Questions

**3. Can you clarify if an LEA can submit instead of a SEA?**

No. For this competition, the only eligible applicants are SEAs.

**4. How many LEA's are awarded per year?**

ED doesn't award funds to LEAs in this competition. ED awards to SEAs, and SEAs may choose to subgrant to LEAs. So, the answer to this question would depend on the number of LEAs that each grantee selected and cannot be known in advance by ED.

**5. Can a subgrant be allowed for the SEA to HEA?**

The only authorized subgrants in this program are from SEAs to LEAs.

- 6. What types of entities are allowable subgrantees under this competition? \***  
Grantees under this competition may award subgrants—to directly carry out project activities described in its application—to LEAs. LEAs are the only allowable subgrantees.
- 7. Can a LEA subcontract with a partner university?**  
Yes, an LEA may use any method permissible under state or local procurement law and consistent with Uniform Guidance procurement requirements (i.e., not a subgrant) to make agreements with other entities to complete work under the grant.
- 8. How can a partner receive funds for services? Are contracts allowed?**  
SEAs or LEAs that receive subgrants may use any method permissible under state or local procurement law and consistent with Uniform Guidance procurement requirements (i.e., not a subgrant) to make agreements with other entities to complete work under the grant. A partner might therefore receive funds as a contractor, but only in accordance with Uniform Guidance procurement requirements.
- 9. Can a SEA contract with another entity to provide recruitment services for MH professionals (not a sub awardee relationship)?**  
Yes.
- 10. Can SEAs contract or work with university systems for recruitment and/or retention?**  
Yes.
- 11. "Uses" of funds might require services (i.e., training) from a university. So how does the university receive funds? Through a contract? And - if a university wants to provide "practicum" telehealth experiences to up training, how does the university get paid?**  
Yes, a SEA or a LEA could contract with a university but must do so in accordance with Uniform Guidance procurement requirements.
- 12. A different agency than our SEA is the State government agency with responsibility for workforce recruitment and retention. If our SEA is required to be the grantee, may we collaborate with that agency as a subgrantee? \***  
Under the terms of the NIA, SEAs may only subgrant to LEAs under this program. There may be other types of agreements/partnerships authorized under State law that may permit collaboration between the SEA and other entities.
- 13. Can SEAs subgrant to individuals/service providers in the form of student loan repayments, tuition reimbursements, etc.?**  
These aren't subgrants but are allowable recruitment and retention strategies for either the SEA or the LEA to use. In fact, student loan repayments are mentioned in the NIA in the definition of "recruitment" as one possible strategy to use.
- 14. Do you have to subgrant to LEAs? Or can you contract out the funds directly to individuals, agencies, contracts, etc.—as long as the budget is specific?**  
SEAs are not required to, but may, subgrant to LEAs. SEAs may also contract directly with other entities in carrying out the program.

**15. Does the answer to the question of sub-awardees (only LEAs are allowed to be sub-awardees) preclude grant funds being transferred to another State agency (other than the SEA) under another type of arrangement (not sub-awardee) at the state level?**

A SEA may use any method permissible under state procurement law (i.e., not a subgrant) to make agreements with other entities to complete work under the grant.

**16. Is there a difference between a sub-grantee and a contract?**

Yes, a subgrant is different than a contract. For this competition, the only eligible subgrantees are LEAs. See Uniform Guidance and State and local law for requirements pertaining to both subgrants and contracts.

**17. Can a SEA create an MOU that results in grant funds being transferred to another State agency?**

Yes, a SEA may use any method permissible under state procurement law (i.e., not a subgrant) to make agreements with other entities to complete work under the grant.

## Budget Questions

**18. Please clarify the amount of awards, per register, it states estimated range of awards is 1.5 - 2.5 million. We are under the impression that this is the total for all 5 years and not per year. But a statement was made 1.5 - 2.5 million per year?**

Estimated awards will be 1.5 - 2.5 million, with an average of 2 million per year of the grant. For example, if a grantee received an award for 2 million each year, the grantee would receive a total of 10 million dollars over the life of the grant. As always, annual funding depends on congressional appropriations. Such funds are expected but not guaranteed as ED has no control over congressional appropriations.

**19. If 10 million is the total award, then is 50 million the total appropriation for this program from Congress?**

Yes, provided congressional appropriations are provided to the program for each of the 5 years of the grant.

**20. Can I use my CARES Act funds to cover the annual required 25% match? \***

No, this is not an allowable resource for the match.

**21. Would we be allowed to sub-grant funds to our Designated Mental Health Agencies (DAs) who work in partnership with our LEAs to provide school-based mental health services, to supplement the salaries they can offer to recruit mental health clinicians or to provide retention bonuses to their clinicians who work with our high need schools?**

Under the terms of the NIA, SEAs may only subgrant to LEAs under this program, so subgrants to DAs would not be permissible. However, an SEA could award a subgrant to a LEA, and the LEA could use the funds for the purposes described in this question – i.e., to supplement the salaries and retention bonuses that the DAs can offer – particularly given that the DAs are described as working in partnership with LEAs to provide school-based mental health services. Another option is that LEAs could contract or enter into other types of agreements permissible under State and local procurement guidelines with the DAs, in accordance with the Uniform Guidance procurement

requirements. Or, the SEA could use the funds directly for the purposes described in this question, subject to state procurement laws.

**22. For the 25% match, can proportionate shares of the salaries and benefits of existing employees who are reassigned a portion of their time to this work be included within our State match? \***

Yes, but a grantee must conform with the applicable Uniform Guidance provisions, including 2 CFR 200.306, which would include proper valuation of any employee services provided. Please be mindful of the requirement that planned uses of grant funds must supplement and not supplant existing school-based mental health services funds and expand, not duplicate, efforts to increase the number of providers.

**23. Can in-kind staff time and any financial incentives for clinicians from State funds may count toward the 25% match requirement? \***

The match may be provided through in-kind services, but a grantee must follow the Uniform Guidance provisions regarding matching in 2 CFR 200.306. Please be mindful of the requirement that planned uses of grant funds must supplement and not supplant existing school-based mental health services funds and expand, not duplicate, efforts to increase the number of providers.

**24. Can the match be an FTE position, an in-kind match, or does it need to be actual funds? \***

Yes, the match may be provided through in-kind services, but a grantee must follow the Uniform Guidance provisions regarding matching in 2 CFR 200.306. Please be mindful of the requirement that planned uses of grant funds must supplement and not supplant existing school-based mental health service funds and expand, not duplicate, efforts to increase the number of providers.

**25. If the grant is about 2 million per year, the SEA would have to match about 500,000. Can that be existing funding sources (supplement vs. supplant)?**

We think this question has been answered by previous questions but also suggest referring to webinar slide 40.

**26. Can participating district staff, paid through State dollars, count as an in-kind match?**

Yes.

**27. Will subgrantees also be required to the 25% match when being a subgrantee or will that be based on SEA requirements for sub-grants?**

The match requirement only applies to SEAs.

**28. Can you please provide a specific definition of "administrative expenses", which are limited in this Funding Opportunity to no more than 10% of the grant funds? Does it include personnel, travel, office supplies?**

There is no specific definition for this term. As a general rule, the expense category is not determinative on its own. Rather, the determination is fact-specific and focused on whether the cost is involved with providing direct grant services. If so, it should not be categorized as administrative. So, for example, in most cases the cost of travel and personnel would accordingly not be administrative, though the cost of arranging travel, as distinct from the actual cost of the travel, would be administrative.

**29. Can SEA give stipends to attend training, such as stipends to educators who wish to become certified school mental health providers? If yes, is there a limit on stipend size?**

Stipends are allowable, and they must be “reasonable and necessary” and otherwise consistent with Subpart E (cost principles) of the Uniform Guidance, 2 CFR 200.

**30. Can funds be used for telehealth start-up costs at LEAs and telehealth technology upgrades at the SEA?**

Yes, this is allowable, as long as it is clear that these costs are “reasonable and necessary” to meeting the grant objectives.

## **Other Questions / Comment**

**31. May I use the presence of a Mental Health - Health Professional Shortage Areas (Mental Health HPSA) as one criterion to identify need?**

As set out in the NIA, to be eligible, applicants must show “need,” and one way to do this is by showing a high student to mental health service provider ratios as compared to other LEAs statewide or nationally. The mention of this HPSA might be relevant in that discussion.

In addition, there is a “need” selection criteria, and this could be part of that description as well. As always, an applicant should use good judgment to determine what should be included in the application.