



# U.S. ELECTION ASSISTANCE COMMISSION

## HELP AMERICA VOTE COLLEGE PROGRAM Q&A

Please review the Q&A document below prior to submitting a new question. To ask a question, email [HAVCP@eac.gov](mailto:HAVCP@eac.gov) with HAVCP Q&A in the subject line. All questions must be received by 5pm on December 13, 2023.

**Q1: Is there a definition of a college student?**

A: College Student means any individual enrolled either on a part-time or full-time basis in any undergraduate, graduate or professional college accredited by an agency recognized by the U.S. Department of Education in the United States.

**Q2: Can we run a voter registration drive in conjunction with the poll-worker recruitment?**

A: Yes, so long as EAC grant funds are not used to fund this activity and the activity is clearly distinguishable from the activities supported by the grant. Voter registration and get-out-the-vote activities are not allowable expenditures under this program.

**Q3: Poll workers are required to be affiliated with a political party in our state. Are we still eligible to apply given the prohibition on partisan activities described in the funding Notice?**

A: Yes, the prohibition refers to partisan campaign activities, not official duties associated with being a poll worker. A grantee can have an eligible nonpartisan program notwithstanding the fact that the actual poll worker students may be volunteering in states that have specific requirements or procedures for poll worker political affiliations.

**Q4: Will EAC reimburse for pre-award expenses made in preparation for college poll-worker recruitment before receipt of the Notice of Grant Award?**

A: Pre-award costs are those incurred prior to the effective date of the Federal award or subaward directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency. If charged to the award, these costs must be charged to the initial budget period of the award, unless otherwise specified by the Federal awarding agency or pass-through entity. EAC will allow grant recipients to request pre-award expenses incurred after November 16, 2023, but

prior to the award budget start date. Total pre-award costs requested may not exceed 20% of the federal award. Pre-award costs for matching funds must also not exceed 20%.

All pre-award costs are incurred at your own risk. EAC is under no obligation to reimburse you for these costs if you do not receive a grant award from the EAC or if the award is less than anticipated and inadequate to cover such costs; also, there is no guarantee that payment will be made by EAC for any costs incurred. No payment for services provided or costs incurred by you will be made unless and until there is a fully executed grant award between EAC and your organization. In addition, even if a grant award is executed, EAC may disallow your costs because of federal funding source limitations, violation of statute or regulations, or other good cause considered sufficient by the EAC.

**Q5: Does the EAC seek programs that train poll workers to assist voters with disabilities or is there an additional goal of recruiting individuals with disabilities as poll workers?**

A: New applicants are not required to have a program that accomplishes these goals; however, EAC is interested in funding programs that propose development of curriculum, training guides, and best practices associated with recruiting poll workers with disabilities and making polling places more welcoming and accessible to those with disabilities. Note, however, that there is no requirement that applicants must recruit poll workers with disabilities.

**Q6: Are we able to partner with organizations in other states or jurisdictions by filing a joint application?**

A: Yes, an application may be developed jointly by more than one agency or organization, although the application must identify one organization as the legal applicant. The other participating organizations can be included as coparticipants, sub-grantees, or subcontractors.

**Q7: What are examples of allowable costs?**

A: Some examples of allowable costs are:

- i. Salaries for Project Coordinators and assistants
- ii. Recruitment materials such as flyers, brochures, and t-shirts
- iii. Websites and social network strategies for marketing
- iv. Training materials
- v. Community Volunteer recruitment and training
- vi. Travel expenses for students serving as poll workers on Election Day
- vii. Surveys and analysis of participation rates, reactions, and recommendations

**Q8: Can we pay a stipend to students?**

A: Generally, yes, students can receive a stipend for attending training or participating in the program. We would allow stipends or recognition for participation or enticements for serving as

poll workers. We will not pay for cash prizes or awards for competitions. A grantee would not be prohibited from using in-kind or non-federal funds to provide prizes. One thing to note: when the students serve as poll workers; most jurisdictions will give them a stipend. The program does not allow students to receive stipends when they are already being paid by the jurisdiction where they will be serving as poll-workers. In other words, no double payment for serving as poll workers should be made to students.

**Q9: What costs are unallowable?**

A: Awards are required to comply with HAVA legislation and 2 CFR 200. Examples of unallowable expense include alcoholic beverages, debt, contingencies, contributions to other entities, entertainment (including costs of amusement, diversion, social activities, capital improvements, ceremonials, and costs relating thereto, such as meals, lodging, rentals, transportation, gratuities, and prizes), goods or services for personal use, organization costs (such as incorporation fees, brokers' fees, fees to promoters, management consultants, attorneys, accountants, or investment counselors), religious activities, lobbying, voter registration, and get-out-the-vote expenditures.

**Q10: Are indirect costs allowable?**

A: Indirect costs are allowed only if: a) the applicant has a current, federally approved indirect cost rate; or b) the applicant is eligible to use and elects to use the "10% de minimis" indirect cost rate described in 2 C.F.R. 200.414(f). *(See paragraph D.1.b. in Appendix VII to Part 200—States and Local Government and Indian Tribe Indirect Cost Proposals for a description of entities that may not elect to use the "de minimis" rate.)*

Grantees may recover indirect costs under this grant up to 10 percent of the total Federal share of the grant. If an applicant has an approved federal indirect cost rate, the remainder of the indirect costs can be used as a matching contribution.

An applicant with a current, federally approved indirect cost rate must attach a copy of the rate approval, *(a fully executed, negotiated agreement.)* If the applicant does not have an approved rate, one can be requested by contacting the applicant's cognizant Federal agency, which will review all documentation and approve a rate for the applicant organization, or if the applicant's accounting system permits, costs may be allocated in the direct costs categories. *(Applicant Indian tribal governments should review Appendix VII to Part 200—States and Local Government and Indian Tribe Indirect Cost Proposals regarding submission and documentation of indirect cost proposals.)* The narrative for any indirect costs should clearly state which direct costs the indirect cost agreement is being applied to. All requested information must be included in the budget detail worksheet and budget narrative.

**Q11: Can I apply for both the Poll Worker Program and the Mini-Grant Program?**

A: No, organizations may only to either the Poll Worker Program or the Service Day Mini-Grant Program.

Service Day activities are allowable under the Poll Worker Program and should be included in the Poll Worker application budget.

Service Day Mini-Grants are intended for organizations who are only seeking funding to host service day activities in their community.

**Q12: What is the total amount available for this program?**

A. The full funding amount for the Help America Vote College Programs is \$1,000,000, which is allocated between the Poll Worker Grant Program (\$850,000) and the Service Day Mini-Grant Program (\$150,000).

**Q13: The application kit states that project periods will begin on February 1, 2023. Is this a typo?**

A. Yes, the first version of the Application Kits for both the Poll Worker Grant Program and the Service Day Mini-Grant Program erroneously stated the anticipated start date for the program was February 1, 2023. The actual anticipated start date is February 1, 2024, not 2023. This error has been corrected in our application documents and the revised versions have been posted to Grants.gov and the EAC HAVCP website.

**Q14: Can HAVCP funding be used to support programming for high school students if it's performed by college students? Are there EAC grant programs for targeting high school student election clerks?**

A. Activities for both the Poll Worker Grant Program and the Service Day Mini-Grant Program must target college students for recruitment as poll workers and other election-related positions. Programming for high school students, regardless of whether the activities are performed by college students, would not be an eligible activity for HAVCP funding. If a program includes activities for both college students and high school students, only the portion of your program that trains and recruits college students for work on election day would be considered eligible for funding. However, grant funds cannot be used outside of that purpose. It is up to your discretion if funding a portion of the activities provides adequate support to meet the needs of a grant program.

Currently, EAC does not have guidance on additional sources of federal funding for programs targeting high school students as election clerks. We recommend contacting your state elections office regarding grant programs they may be aware of.

**Q15: Can you send us the recording from today's meeting?**

The live session recording will be posted here as soon as possible:

<https://www.eac.gov/grants/help-america-vote-college-program>