
Allowability of Payments to Uniformed Services and Civilian Federal Employees

NOTE: Grants Management Advisories (GMAs) provide guidance for ONC grantees in selected areas based on ONC's receipt of recurring questions or other factors. Their purpose is to provide a common interpretation for all ONC grantees of how ONC will apply existing policy as reflected in award terms and conditions. They do not replace or modify award terms and conditions.

ISSUE:

Can ONC grant or cooperative agreement funds be used for payment of tuition and trainee support costs for members of the United States uniformed services or civilian Federal employees?

KEY POINTS:

- Trainees under ONC grant and cooperative programs are not direct recipients of funds from ONC; i.e., the funds for these training programs are awarded to an institution of higher education which, in turn, selects trainees and incurs costs/makes payments on their behalf.
- Although there is no general prohibition on an active member of the uniformed services or other Federal employee receiving training through a grant- or cooperative agreement-supported program, the conditions of the individual's participation in the program are a combination of
 - meeting the eligibility requirements of the program, as administered by the recipient, and
 - the individual's conditions of employment, as administered by his or her employing agency, including review of the potential for dual compensation, conflict of interest or other applicable standards of conduct, and leave status when taking the training.
- Recipients should encourage federal employee applicants or uniformed service members to consult with their agency's Designated Agency Ethics Official or Office of General Counsel to determine whether any applicable restrictions would preclude their receipt of a scholarship given laws, regulations and policies that govern the conditions of their federal employment.

RECIPIENT RESPONSIBILITIES:

- A recipient can rely on information provided and representations made by an individual at the time of application to become a trainee, but must determine whether an individual applying for training is a Federal employee. If an individual is a Federal employee, the recipient should document the individual's Federal employing agency.

If a recipient has any questions about the status of a Federal employee enrolling in an ONC grant- or cooperative agreement-supported program, the recipient may request that the individual provide a statement from his or her employer indicating that the individual is not precluded by federal law, regulation or policy from participating in the program.

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KEY DOCUMENTS:

HHS Grants Policy Statement