

Universal Errata (July 15, 2026)

Grantee Determination of Grant-Funded Position Functions as Administrative or Programmatic

Description of Change

The following errata is issued as it relates to grantee determinations related to the functions of grant-funded positions and the classification of these functions as administrative or programmatic.

The grantee is responsible for making case-by-case determinations to determine whether the functions of a grant-funded position are administrative or programmatic, or divided between both. There may be overlap in characteristics and activities, and no single factor or combination of factors is necessarily determinative. There are no uniform federal regulations that define how to characterize costs as either direct program or direct administrative costs. However, the organization must be consistent across programs in how they charge these costs. In making this determination, the following should be considered:

- **Administrative:** Direct administrative tasks generally consist of activities that support the grantee in meeting compliance and reporting requirements. Examples of direct administrative activities may include data collection, performance and financial reporting, program evaluation services, development and implementation of grants procedures, documenting compliance and responding to the results of monitoring or audits (including non-compliance resolution), etc.
- **Programmatic:** Programmatic tasks generally involve service delivery and performance of the award. Examples of programmatic activities may include conducting and/or participating in professional development and training, providing technical assistance, providing compliance assistance and support to school systems, direct student services, outreach to school systems or applicable community partners, etc.