# Health Care Employer Nursing Apprenticeship and Pipeline Grant Program

**Program Guidance** 

Issued by the Vermont Agency of Human Services (V2)



Version History	
V2 – 6/26/23	Clarified higher-level nursing professional
	requirements; updated degree programs to
	include MSN for Round 1; clarified inclusion
	of books and supplies in tuition and fees
	category.

## Program Guidance – Nursing Apprenticeship and Pipeline Program

## Contents

Progra	ım Guidance	4			
1.	Program Description				
2.	Eligible Employers	5			
3.	Staff Participants	5			
4.	Nursing Apprenticeship and Pipeline Program Required Program Elements	6			
5.	Nursing Apprenticeship and Pipeline Program Optional Program Elements	6			
6.	Additional Obligations for Partnerships between two or more Eligible Employers	7			
7.	Obligated Commitment to Sponsoring Employers	7			
8.	Eligible Expenditures	8			
a	. Tuition and Fees	8			
b	. Financial Support for Living Expenses	9			
C.	Employer-Based Clinical Education	9			
d	. Program Design, Management, and Sustainability Planning	10			
Applic	ation Information	11			
9.	Available Funding Amount	11			
10.	Application Period	12			
11.	Method of Application Submission	12			
12.	Review and Selection Criteria	12			
13.	Round 1 Application Content and Audit Requirements	14			
14.	Round 2 Application Letters of Intent	14			
15.	Conflict-of-Interest Policy	15			
16.	Contact Information	15			
Annen	dix A – Flements of Effective Nursing Apprenticeship and Pineline Programs	16			

## Program Guidance

## 1. Program Description

The Agency of Human Services (AHS) is issuing this grant opportunity for Vermont health care employers per Act 183 of 2022 and Act 3 of 2023. The Health Care Employer Nursing Apprenticeship and Pipeline Grant Program (hereafter called "Grant Program") provides funding to establish or expand partnerships with Vermont nursing schools to create nursing pipeline programs, apprenticeship programs, or both that will train members of the health care employers' existing staff to become higher-level nursing professionals.

The Grant Program's overarching goal is to enhance the state's health care capacity by increasing the number of higher-level nursing professionals in Vermont. The Grant Program explicitly responds to the state's long-standing shortage of nursing professionals, a problem that has been exacerbated by the COVID-19 public health crisis.

Grant Program funds may be used to support health care employer efforts to establish or expand partnerships with Vermont nursing schools to create or expand a nursing apprenticeship or pipeline program and to design, administer, and engage in sustainability planning for such programs. Grant Program funds may also be used to offset the cost of tuition and fees and to provide support for living expenses for the Staff Participants, who may pursue either 1) a Practical Nursing (PN) certificate, 2) an Associate of Science in Nursing (ADN) degree leading to eligibility for RN licensure, and/or 3) a Bachelor of Science in Nursing (BSN) degree, depending on the design of the program at a particular health care employer.

Grant Program funds will be disbursed in two funding rounds. The first funding round will provide grant awards of up to three years for nursing apprenticeship or pipeline programs with Staff Participants entering degree/certificate programs in the Fall 2023, Spring 2024, or Summer 2024 academic terms; the second will provide grant awards of up to two years for programs with program participants entering degree/certificate programs in the Fall 2024, Spring 2025, or Summer 2025 academic terms.

Note that Grant Program funds awarded during Round 1 may be used to offset the cost of tuition and fees and to provide support for living expenses for Staff Participants who pursue a Master of Science in Nursing (MSN) degree, in addition to offsetting such costs and providing support for living expenses for Staff Participants who pursue the degree/certificate programs noted above.

Program Guidance – Nursing Apprenticeship and Pipeline Program

All Grant Program funds must be expended by September 30, 2026. All individual Staff Participants must attain a degree or certificate that qualifies them to become a higher-level nursing professional by December 31, 2026.

## 2. Eligible Employers

Eligible Employers are health care employers in Vermont. This includes but is not limited to hospitals, federally qualified health centers, primary care providers, long term services and supports (including long-term care facilities) providers, home health agencies, designated and specialized service agencies, and dental providers.

Eligible Employers that receive a grant award must use Grant Program funds to 1) expand an <u>existing</u> nursing apprenticeship or pipeline program or 2) implement a <u>new</u> nursing apprenticeship or pipeline program. Eligible Employers awarded grants for <u>new</u> programs are required to submit a signed letter of commitment from their Vermont nursing school partner within three months of Grant Program award or prior to Staff Participants' academic start date, whichever comes first, to guarantee continued funding.

Note that Eligible Employers may elect to partner with other Vermont health care employers to extend nursing apprenticeship or pipeline opportunities to staff members in a wider variety of health care employer types statewide.

#### 3. Staff Participants

Staff Participants include existing or newly hired staff members at the time of their selection for the nursing apprenticeship or pipeline program. Such roles may include but are not limited to the following: personal care attendants, home health aides, licensed nursing assistants, licensed practical nurses, community health workers, peer specialists, recovery coaches, and/or registered nurses seeking to obtain a BSN or an MSN degree.

Eligible Employers may only provide Grant Program benefits to Staff Participants that meet the entry requirements for the degree/certificate academic program they intend to pursue <u>or</u> are willing to engage in coursework or other tutoring/training that will prepare them for academic program entry.

Eligible Employers that receive grant awards are responsible for determining the detailed criteria they will use to select Staff Participants for the nursing apprenticeship or pipeline program established at their organization. AHS encourages Eligible Employers to leverage Grant

Program funds to advance the professional development of health care employees from marginalized communities<sup>1</sup>.

All individual Staff Participants must attain a degree or certificate that enables them to qualify as a higher-level nursing professional by December 31, 2026. Eligible Employers must codevelop a plan with Staff Participants for achieving this requirement and maintain written documentation of the plan.

## 4. Nursing Apprenticeship and Pipeline Program Required Program Elements

AHS recognizes that nursing apprenticeship and pipeline programs are most likely to be successful and sustainable when they are thoughtfully tailored to the unique circumstances of the employer organization in which they are established. However, in the interest of establishing a baseline level of standardization across the nursing apprenticeship and pipeline programs funded by the Grant Program, Eligible Employers are required to include the following elements in nursing apprenticeship and pipeline programs supported by Grant Program funds:

- Academic education formalized through a partnership agreement with a Vermont nursing school.
- Financial support for academic tuition and fees for Staff Participants (note that for the purposes of the Grant Program, financial support can include external scholarships and grants, as well as Grant Program and employer support for tuition and fees).
- Financial support for living expenses for Staff Participants in the form of paid release time <u>or</u> stipends to support time for education and study.
- Plan and resources for administering the Grant Program, which may include activities related to program design, program management, and program sustainability planning.

Eligible Employers that receive grant awards must guarantee that the nursing apprenticeship or pipeline program they establish enrolls at least two Staff Participants at each training site to ensure a minimum level of peer support.

5. Nursing Apprenticeship and Pipeline Program Optional Program Elements Appendix A outlines program elements, including but not limited to academic support and wraparound support, known to contribute to effective apprenticeship and pipeline programs across a variety of sectors.

<sup>&</sup>lt;sup>1</sup> For example, see <u>Enhancing Diversity in the Nursing Workforce</u> online at: <u>https://www.aacnnursing.org/news-data/fact-sheets/enhancing-diversity-in-the-nursing-workforce</u>.

Eligible Employers may elect to include some, all, or none of the non-required program elements identified in Appendix A in their nursing apprenticeship or pipeline program, depending on the priorities of and resources available to their organization. Eligible Employers may also choose to include other program elements not identified in Appendix A if they determine that those elements have the capacity to enhance the impact or sustainability of their program. Note that additional grant funds are available to Eligible Employers that include employer-based clinical education in their program design.

6. Additional Obligations for Partnerships between two or more Eligible Employers Eligible Employers may elect to form a partnership with other Eligible Employers to establish and operate a program. Partnerships between two or more Eligible Employers must 1) identify a lead organization to be responsible for managing grant funds and ensuring compliance with funding requirements, and 2) include a plan for coordinating funding and program activities across all partners. Lead organizations that receive grant awards are expected to engage partner organizations through a legally binding agreement.

## 7. Obligated Commitment to Sponsoring Employers

Eligible Employers that use Grant Program funds to provide financial support for tuition and fees or living expenses for Staff Participants <u>may</u> require such Staff Participants to commit to working with the organization as a higher-level nursing professional following completion of the nursing apprenticeship or pipeline program. However, AHS expects that Eligible Employers that use Grant Program funds to cover Staff Participants' tuition and fees or living expenses will require <u>no more than **one year** of service commitment</u> for <u>each year of funding</u> they provide for a Staff Participant who pursues a nursing degree or certificate through the nursing apprenticeship or pipeline program.

Eligible Employers may require that such service commitments begin only when the Staff Participant has completed the highest degree attainable through the nursing apprenticeship or pipeline program prior to December 31, 2026. For example, if a Staff Participant completes both a Practical Nursing certificate and an Associate of Science in Nursing degree through the nursing apprenticeship or pipeline program, the Eligible Employer may require that all years of the Staff Participant's service commitment begin only after the Staff Participant has completed the Associate degree portion of the program.

Eligible Employees that intend to use Grant Program funds to support Staff Participant tuition and fees or living expenses and require a service commitment of Staff Participants in the nursing apprenticeship or pipeline program must obtain <u>AHS pre-approval</u> for any such service

commitments and are expected to request approval prior to the start date of the academic portion of the nursing pipeline or apprenticeship program. Requests may be submitted with Grant applications.

Eligible Employers that use Grant Program funds to cover Staff Participants' tuition and fees or living costs and elect to require Staff Participants to commit to working with them upon program completion are solely responsible for developing and monitoring obligated service contracts with Staff Participants. Eligible Employers may <u>not</u> recoup Grant Program funds from Staff Participants in the event they do not complete their service commitment to the Eligible Employer.

Eligible Employers that leverage another funding source to provide financial support for tuition, and fees or living expenses for Staff Participants are not subject to the above restrictions on the requirements they establish with regards to Staff Participant commitment to working with them as a higher-level nursing professional following completion of the nursing apprenticeship or pipeline program.

## 8. Eligible Expenditures

Grant awards may be used by Eligible Employers for any of the following purposes:

a. Tuition and Fees -- Staff Participants' tuition and fees must be covered in full by one or more funding sources (Grant Program funds, Eligible Employer funds, and/or scholarships and grants). Grant awards may be used by Eligible Employers to cover the cost of tuition and fees for Staff Participants enrolled in a nursing degree/certificate program at the Vermont nursing school with which the Eligible Employer is partnered. Grant awards may also be used to cover the cost of tuition and fees for Staff Participants enrolled in a formal program to prepare the Staff Participant for entry into a nursing degree/certificate program (such as the Allied Health Preparation Certificate Program at Community College of Vermont or a similar program) if the Staff Participant will be able to complete a PN certificate program or qualifying nursing degree by December 31, 2026. Additionally, grant awards may be used to cover the cost of Staff Participant books and supplies related to the pursuit of a relevant degree or certificate program, per Eligible Employer discretion.

Eligible Employers may expend up to the total cost of tuition, fees, books, and supplies for the number of Staff Participants identified in their grant award. Eligible Employers may also encourage or require Staff Participants to apply for scholarships and grants to

reduce the cost of tuition and fees borne by the Grant Program. The total cost of tuition and fees per Staff Participant will be established by Vermont nursing schools.

b. Financial Support for Living Expenses -- Staff Participants must be provided with financial assistance in meeting their living costs through one or more funding sources (e.g., Grant Program funds, Eligible Employer funds, and scholarships and grants). Grant Program funds may be used by Eligible Employers to provide financial support for living expenses for Staff Participants, with the goal of enabling Staff Participants to pursue academic coursework and study to become a higher-level nursing professional.

Eligible Employers may provide financial support for living expenses through one of the following mechanisms:

- i. Paid release time that is equivalent to the remuneration received by Staff Participants (inclusive of salary and benefits). The dollar amount of the paid release time provided should reflect the number of hours per week/weeks per month for which Staff Participants are released from regular staff duties for educational purposes.
- ii. Stipends that support Staff Participant time for education and study. Stipend amounts should be sufficient to allow Staff Participants to take time away from work for education purposes.

Eligible Employers may expend up to the total cost of the financial support for living expenses they provide to enable Staff Participants to pursue academic coursework and studies to become a higher-level nursing professional.

c. Employer-Based Clinical Education – Grant awards may be used by Eligible Employers to cover the costs of providing employer-based clinical education for Staff Participants pursuing an ADN or BSN degree or PN certificate, including the costs of preparing clinical faculty and supporting clinical faculty teaching hours.

Eligible Employers may expend up to \$20,000 on employer-based clinical education activities per Grant Program year for nursing apprenticeship or pipeline programs that serve cohorts of up to ten (10) Staff Participants. Eligible Employers may expend up to \$30,000 per Grant Program year for programs that serve cohorts of 11 or more Staff Participants.

d. Program Design, Management, and Sustainability Planning – Grant awards may be used by Eligible Employers to cover the cost of the staff time needed to design, manage, and engage in sustainability planning for the program established at their organization. Note that program management activities may include the delivery of support for Staff Participants pursuing an ADN or BSN degree or PN certificate not funded elsewhere, including but not limited to academic support, wraparound support, and employer-based mentors, per the discretion of the employer. Program management activities may not include the delivery of such supports for Staff Participants pursuing an MSN degree. Program sustainability planning supported by grant awards may include activities related to becoming an apprenticeship program registered with the State of Vermont<sup>2</sup>.

Eligible Employers may expend up to \$75,000 on program design, management, and sustainability planning activities per Grant Program year for nursing apprenticeship or pipeline programs that serve cohorts of up to ten (10) Staff Participants. Eligible Employers may expend up to \$85,000 per Grant Program year for programs that serve cohorts of 11 or more Staff Participants.

All applications must demonstrate that there is sufficient funding available from one or more sources (Grant Program funds, Eligible Employer funds, and/or additional grants and contracts) to support program design, management, and sustainability planning activities.

Eligible Employers with <u>existing</u> nursing apprenticeship or pipeline programs may only use Grant Program funds to <u>increase</u> the number of Staff Participants in the program. For example: If the Eligible Employer's Grant Program enrolled five (5) Staff Participants in previous years, and the Eligible Employer requests Grant Program funds to expand the number of Staff Participants to six (6), the Eligible Employer will only be able to use the grant award to cover the cost of tuition and fees and financial support for one (1) Staff Participant.

Eligible Employers with <u>new</u> nursing apprenticeship or pipeline programs may use grant awards to cover the cost of tuition and fees and financial support for <u>all or some</u> Staff Participants, per their discretion.

Eligible Employers that receive a grant award will be paid on a reimbursement basis. Requests for reimbursement may be submitted quarterly.

<sup>&</sup>lt;sup>2</sup> More information about the <u>Vermont Registered Apprenticeship Program</u> is available through the State of Vermont Department of Labor.

## **Application Information**

## 9. Available Funding Amount

A total of \$9.0 million is available for the Health Care Employer Nursing Apprenticeship and Pipeline Grant Program over two funding rounds. \$4.5 million is available for each funding round. Any unobligated funding from the first round will carry over to the second round. The total number of grants awarded to Eligible Employers will be determined by the number and quality of applications received. Similarly, the amount of the grant awarded to an Eligible Employer may be equal to or less than the amount requested by that employer depending on the number and quality of applications received.

Eligible Employers submitting applications for the <u>first</u> funding round may request funding for Staff Participants <u>entering</u> either formal nursing degree/certificate programs and/or formal preparation for entry into such programs in Fall 2023, Spring 2024, or Summer 2024.

Eligible Employers submitting applications for the **second** funding round may request funding for Staff Participants entering such programs in Fall 2024, Spring 2025, or Summer 2025.

Eligible Employers are encouraged to commit matching funds as part of their grant request. Matching funds may be used for any or all of the following purposes:

- a. Staff time or consultants for program design.
- b. Staff time or consultants for program administration.
- c. Staff time or consultants for program sustainability planning.
- d. Financial support for living expenses for Staff Participants through paid release time or stipends for education.
- e. Financial support for employer-based clinical education, including but not limited to support for incentives for clinical instructors, preparation and other supports for clinical instructors, and/or support to "back fill" for clinical instructors' direct nursing responsibilities.
- f. Staff time or outside resources for academic support for Staff Participants.
- g. Staff time or outside resources for wraparound support for Staff Participants.
- h. Staff time for employer-based mentors and/or financial support for preparation of employer-based mentors.
- i. Financial support for tuition and fees for additional Staff Participants. (For Eligible Employers with existing nursing apprenticeship or pipeline programs, funds will count as matching if they increase the number of Staff Participants who are able to participate in the program over previous years).

Commitment of matching funds is not a requirement of application submission.

## 10. Application Period

Applications must be submitted during the application period which is June 5, 2023 through July 14, 2023.

## 11. Method of Application Submission

Eligible Employers must submit all application materials to ahs.nurseworkforcegrants@vermont.gov by July 14, 2023 at 11:59 PM.

## 12. Review and Selection Criteria

All complete and accurate applications submitted during the Application Period will be reviewed by a committee of AHS staff members and subject matter experts.

Note that application budgets or matching fund commitments must include financial support for 1) Staff Participants' tuition and fees, 2) Staff Participants' living expenses, and 3) program design, management, and sustainability planning activities for applications to be considered complete.

The review criteria outlined below will be used to review and rank applications:

Review Criteria	Point Value
The quality, completeness, and clarity of the plan for establishing	55 points
and administering a nursing apprenticeship or pipeline program at	
the Eligible Employer(s) inclusive of the following components:	
<ul> <li>Academic partnership with a Vermont nursing school and academic preparation program(s), as appropriate;</li> <li>Plan for establishing and supporting high-quality employer-based clinical education for program participants (if employer-based clinical education is a part of the program design);</li> <li>Plan for selecting Staff Participants from among the Eligible Employer(s)' existing or to-be-hired employees;</li> <li>Plan for supporting the persistence and success of Staff</li> </ul>	
Participants including but not limited to the provision of	

<ul> <li>academic support, wraparound support, peer support, and/or employer-based mentorship;</li> <li>Plan for designing and managing the nursing apprenticeship or pipeline program;</li> <li>Staffing plan, including the experience and qualifications of proposed leaders, staff members, and consultants; and</li> <li>Plan for coordinating program funding and activities across employer organizations (for partnerships between two or more Eligible Employers, only)</li> </ul>	
Note that the extent to which the budget request and commitment of matching funds are sufficient to support the proposed plan will also be considered in this review.	
<ul> <li>Employer commitment to enabling staff members to become higher-level nursing professionals, including:</li> <li>Commitment to participate financially in the nursing apprenticeship or pipeline program;</li> <li>Ability to leverage nursing scholarship opportunities to maximize the reach of the grant funds;</li> <li>Plan for retaining Staff Participants as higher-level nursing professionals beyond any obligated service commitment requirements; and</li> <li>Plan for leveraging the nursing apprenticeship or pipeline program to advance the professional development of employees from marginalized communities and the organization's record of success with regards to advancing the professional development of employees from marginalized communities more broadly</li> </ul>	25 points
Plan for sustaining the nursing apprenticeship or pipeline program beyond the term of the grant, including but not limited to activities related to becoming an apprenticeship program registered with the State of Vermont.	10 points
Creativity and innovation, including:	10 points

The extent to which the proposed plan extends the opportunity to build a high-quality nursing apprenticeship or pipeline program to smaller employers and/or rural communities	
Total Points	100 points

AHS may also consider geographic distribution of funding to advance geographic equity when making final selection decisions.

Please note that if the funds requested in Round 1 exceed the Grant Program funds available for Round 1, funding for Staff Participants pursuing a degree or certificate that enables them to qualify as a licensed practical nurse (LPN) or registered nurse (RN) will be prioritized.

## 13. Round 1 Application Content and Audit Requirements

All applicants must fully complete and submit applications via email to <a href="mailto:ahs.nurseworkforcegrants@vermont.gov">ahs.nurseworkforcegrants@vermont.gov</a> by the submission date. A complete application includes:

- Grant Application and Cover Sheet (use required template)
- Application Budget Form (use required template)
  - Detailed instructions for completing the Budget Form are provided in the required templated
- A completed W-9 form
  - o Form W-9 and detailed instructions are <u>available from the IRS</u>
  - A physical signature and date are required
  - The form must be signed and dated within the last six months

Applications must also 1) include a signed Letter of Commitment from the Vermont nursing school with which the Eligible Employer intends to partner <u>or</u> 2) indicate that such a letter will be forthcoming within three months of Program award or prior to program participants' academic start date, whichever comes first.

## 14. Round 2 Application Letters of Intent

Eligible Employers that are considering applying in the Round 2 application cycle are asked to submit a non-binding Letter of Intent that identifies the following items to the extent that they are known at this time:

Program Guidance – Nursing Apprenticeship and Pipeline Program

- Anticipated cohort size,
- Academic partner (if known),
- Anticipated partnerships with other Eligible Employers (if any), and
- The degree or certificate programs the nursing apprenticeship or pipeline program will support.

The submission of a Letter of Intent is not required in order to submit a Round 2 application. The Round 2 application is expected to be released in January 2024.

Letters of Intent should be submitted via email to <a href="mailto:ahs.nurseworkforcegrants@vermont.gov">ahs.nurseworkforcegrants@vermont.gov</a> by the Round 1 application submission date.

## 15. Conflict-of-Interest Policy

Eligible Employers that receive a grant award must maintain a conflict-of-interest policy consistent with 2 CFR 200.318 (c) that is applicable to all activities funded with the Health Care Employer Nursing Apprenticeship and Pipeline Grant Program.

#### 16. Contact Information

Please submit questions or inquiries via email to ahs.nurseworkforcegrants@vermont.gov.

## Appendix A – Elements of Effective Nursing Apprenticeship and Pipeline Programs

The table below describes elements common to effective apprenticeship and pipeline and programs.

Education		
Academic	The academic education component of a pipeline or apprenticeship	
education	program is typically formalized through a partnership agreement with	
(Required	an academic program, often one that grants a recognized degree or	
component of	certificate.	
Grant Program)		
	• In the case of the Grant Program, the academic partner must grant either a Practical Nursing (PN) certificate and/or an Associate of Science in Nursing (ADN) degree and/or a Bachelor of Science in Nursing (BSN) degree and/or a Master of Science in Nursing (MSN) degree. Formal preparation for entry into a degree/certificate granting academic program could also be a component of a nursing pipeline/apprenticeship programs established via the Program.	
Employer-based	Academic education is often complemented by a formal plan for	
education	employer-based education that enables program participants to master	
(Optional	key skills and better acclimate to the employer's culture, norms, and	
component of	expectations. As a best practice, such plans include onboarding,	
Grant Program)	training, and ongoing support for the employer-based educators.	
	<ul> <li>In the case of the Grant Program, employer-based education would be provided by clinical instructors subcontracted to the academic partner.</li> </ul>	
Support for program participants		
Financial support	Financial support includes:	
(Required		
component of	Support for tuition and fees associated with the program's academic	
Grant Program)	education component in the form of direct payment to the academic	
	institution <u>or</u> repayment of student loans on behalf of program	
	participants or assistance that enables program participants to	
	successfully apply for grants and scholarships.	

	<ul> <li>Support for living expenses while program participants are pursuing academic education, either through paid "release time" for education or the provision of personal grants/stipends for housing, childcare, transportation, and other costs of daily living.</li> </ul>	
Academic support	Academic support includes:	
(Optional		
component of	Tutoring for academic coursework and licensing exams.	
Grant Program)	Assistance building writing or math skills and/or for addressing	
orane rregram,	any of the other academic "gaps" that can present challenges for non-traditional students.	
	<ul> <li>Support for applying to nursing degree/certificate programs.</li> </ul>	
	Support for applying to harsing degree/certificate programs.	
Wraparound	Was no group of a constant and a constant and the constant and a c	
-	Wraparound support can vary depending on the unique needs of	
support	program participants at an individual employer; however, it often	
(Optional	includes:	
component of		
Grant Program)	Career guidance and planning.	
	Support for navigating the myriad social and economic pressures	
	that can present challenges for non-traditional students.	
	<ul> <li>A dedicated mentor from among the senior staff of the employer organization.</li> </ul>	
Peer support	Peer support is often provided by adopting a cohort-based approach to	
(Required	the pipeline or apprenticeship program.	
component of	the biberine of apprenticesting programm	
Grant Program)		
Program administra		
Program	Program administration is, at minimum, responsible for the following	
administration	basic functions:	
(Required		
component of	<ul> <li>Organizing and managing the process for selecting program</li> </ul>	
Grant Program)	participants from among existing staff members.	
	Managing the partnership with the academic program.	

- Managing the employer-based education component of the program, including coordinating and ensuring support for staff members providing this education and organizing "back fill" of clinical instructors' nursing responsibilities.
- Managing and coordinating the various supports offered to program participants.
- Managing the program budget and any associated reporting.
- Engaging in activities aimed at sustaining the program beyond the current grant period (for grant-funded programs).