CALL FOR PROPOSALS
Pan-European Civil society engagement grants - European Elections 2024


Questions and Answers (Q&As)

Version 8 August 2022

You will find below the list of asked questions and replies based on received questions for this calls for proposals. Please note that the present document aims to complement and clarify the current call for proposals and its documents of guidance and does not replace them. The Q&As will be periodically published; applicants are invited to check the following website regularly: https://www.europarl.europa.eu/contracts-and-grants/en/grants
QUESTION 1:

We are a non-profit organisation based in Brussels and we are a member of a pan-European network covering 9 member countries.

We are unable to interpret the rules in Article 9 of the call (EP-COMM-SUBV-2022-PAN-EU-E).

The question is: can we act as an applicant as a member of the pan-European network or is the coordinator of the pan-European network the only eligible applicant?

In other terms, is there a difference between the pan-European network coordinator status and the member status with regard to eligibility to apply?

=> ANSWER 1:

We are thankful for your interest in the call for proposals EP-COMM-SUBV-2022-PAN-EU-E intended to the European Elections 2024.

At this stage, we cannot confirm the eligibility of candidates. Indeed the verification of the eligibility will take place once the submission period ends.

Nevertheless, we remind you that in addition to other criteria, the point nine (9) of this Call for Proposals mentions that to eligible applicants to the call must be 'pan-European membership entities which are a formal part of a network of entities sharing common values. Only entities part of a network represented in seven or more Member States can present proposals to this call'.

Therefore, regarding your question, each applicant must prove that is part of that specific network of entities. There is not specific reference to the role of the entity in the network, it could be either the coordinator of the network or a member of it.

If you have more questions about this Call for Proposals, do not hesitate to contact us again.

Best Regards,

Procurement, Contracts and Grants Unit

QUESTION 2:

In the eligibility criteria I see that the applicants must be able to demonstrate they are, among other things, a pan-European think tank representing formally the interest of a wide group of member entities or individuals from different Member States.

However, following this sentence it is mentioned that "only entities with members from seven or more Member States can present proposals to this call", which wouldn't be the case of our entity, as we are not a membership organisation. Therefore, is it mandatory to have members from seven or more Member States to present proposals to this call?
=> ANSWER 2:

We are thankful for your interest in the call for proposals EP-COMM-SUBV-2022-PAN-EU-E intended to the European Elections 2024.

After carefully reading your message, I understand that you have a question regarding the suitability of your organisation to the concept of pan-European specified in the criteria for this call.

At this stage, we cannot confirm the eligibility of candidates. Indeed the verification of the eligibility will take place once the submission period ends.

We encourage you to review point nine (9) of this Call for Proposals, as for the purpose of this call the definition of pan-European encompasses two different possibilities:

- To either pan-European membership entities which are a formal part of a network of entities sharing common values. Only entities part of a network represented in seven or more Member States can present proposals to this call;

- or to entities representing formally the interest of a wide group of member entities or individuals from different Member States. Only entities with members (organisations or individuals) from seven or more Member States can present proposals to this call.

Therefore, your entity - think tank - **must include member entities from seven or more Member States in order to be eligible.**

If you have more questions about this Call for Proposals, do not hesitate to contact us again.

Best Regards,

Grants, Procurement and Contracts Unit

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QUESTION 3:

Our organisation is considering the possibility of applying for the EP call “Pan-European Civil society engagement grants - European Elections 2024” (see attached). When analysing the call announcement and content we realized that some links are broken. Besides that, we are also unable to access the application form in the portal as it does not seem to be available. We would appreciate some guidance on this, as we need to assess the workload of the application before deciding to go for it or not.

Thank you very much for your help.

=> ANSWER 3:

We are thankful for your interest in the call for proposals EP-COMM-SUBV-2022-PAN-EU-E intended to the European Elections 2024.

We would like to thank you for having warned us that some links of this Call for Proposal were broken. Following your message, we have checked and fixed all the links included in this call for proposals (cf: attached document).

This call for proposals was published on 07/06/2022. As mentioned in the Funding & Tenders Portal, proposals can be submit **as from 22/06 until 30/08 at 17:00.** As the submission has been open since the 22/06, you should now have the possibility to submit a proposal.
If you have more questions about this Call for Proposals, do not hesitate to contact us again.

Best Regards,

Grants, Procurement and Contracts Unit

QUESTION 4:
Further to the notice of the mentioned forthcoming Call, I was wondering whether the committee that will evaluate the proposals will be composed by external experts.

In the affirmative, I ask you to kindly let me know how I can request to be included in the roster of experts of the Parliament (I am already in the SEDIA (Single Electronic Data Interchange Area) roster).

I thank you in advance for your reply,

=> ANSWER 4:
We thank you for your interest for the call with reference EP-COMM-SUB-2022-PAN-EU-E.
We have taken note of your spontaneous application to act as an expert to evaluate potential offers submitted under our programme: EP-COMM-SUB-2022-PAN-EU-E.
Please note that the EP services do not intend to use external experts for the evaluation of projects submitted under this call.

Please, do not hesitate to contact us if you need more information in the future.

Best regards,
The Grants Team

QUESTION 5:
It is not clear to us if the eligible entities for the call EP-COMM-SUBV-2022-PAN-EU-E should only be Pan European.
Is it possible to apply for this call as a foundation (non-profit entity) based on Spain devoted to the European civil society engagement?

Thank you and kind regards,

=> ANSWER 5:
We are thankful for your interest in the call for proposals EP-COMM-SUBV-2022-PAN-EU-E intended to the European Elections 2024.

After carefully reading your message, we understand that you have a question regarding the suitability of your organisation for this call.

At this point of the stage, we cannot evaluate the eligibility of candidates. Indeed the evaluation of the eligibility will take place once the term for submissions is closed and the phase of evaluations starts.
Nevertheless, we inform you that applicants must be able to demonstrate that they are, among other criteria:

- A pan-European civil society organisation, a pan-European youth organisation, pan-European trade union, pan-European think tank, pan-European business or trade association or a pan-European professional associations. For the purpose of this call, the concept of pan-European refers:
  - To either pan-European membership entities which are a formal part of a network of entities sharing common values. Only entities part of a network represented in seven or more Member States can present proposals to this call;
  - or to entities representing formally the interest of a wide group of member entities or individuals from different Member States. Only entities with members (organisations or individuals) from seven or more Member States can present proposals to this call.

Therefore, civil society organisations are encouraged to apply only if they fulfil and formally demonstrate the above described pan-European criteria.

If you have more questions about this Call for Proposals, do not hesitate to contact us again.

Best Regards,

Grants, Procurement and Contracts Unit

QUESTION 6:

I hope that my mail finds you well. I would like to pose a questions regarding the eligibility criteria for submitting a proposal under the Call "Pan-European Engagement Grant (EP-COMM-SUBV-2022-PAN-EU-E)":

- Is a SME (legal entity) which constitutes a national Multiplier of Youth Eurodesk in Greece and Intermediate Organization in Erasmus for Young Enterpreneurs project, eligible for submitting a proposal as pan-European organization?

I have already read the eligibility criteria on page 16 of the Call document, but it was not very clear if one organization should fulfil all the terms mentioned, or at least one of them.

Thank you in advance for the clarification.

=> ANSWER 6:

We are thankful for your interest in the call for proposals EP-COMM-SUBV-2022-PAN-EU-E intended to the European Elections 2024.

At this stage, we cannot confirm the eligibility of candidates. Indeed the verification of the eligibility will take place once the submissions term ends.

We encourage you to review the point nine (9) of this Call for Proposals regarding eligibility criteria, where states that applicants must be able to demonstrate that they are:
- A pan-European civil society organisation, a pan-European youth organisation, pan-European trade union, pan-European think tank, pan-European business or trade association or a pan-European professional associations. For the purpose of this call, the concept of pan-European refers:

  - To either pan-European membership entities which are a formal part of a network of entities sharing common values. Only entities part of a network represented in seven or more Member States can present proposals to this call;

- or to entities representing formally the interest of a wide group of member entities or individuals from different Member States. Only entities with members (organisations or individuals) from seven or more Member States can present proposals to this call.

- A legal person constituted and registered as not for profit entity or equivalent according to the national legislation, for at least three years at the time of application;

- Based in one of the Member States of the European Union;

- Legal person with nonpartisan political affiliation.

Therefore, and attending your request, every applicant should fulfil all these criteria in order to be eligible.

If you have more questions about this Call for Proposals, do not hesitate to contact us again.

Best Regards,

Grants, Procurement and Contracts Unit

QUESTION 7:

On behalf of our organisation, I would like to set specific questions as regards the call "Pan-European Civil society engagement grants - European Elections 2024 EP-COMM-SUBV-2022-PAN-EU-E" funded by the European Parliament, to which we are really interested to apply.

In particular,

- According to the aforementioned call (pg.16) eligible participants should be "pan-European membership entities which are a formal part of a network of entities sharing common values. Only entities part of a network represented in seven or more Member States can present proposals to this call". Therefore I was wondering if our organisation falls under the eligibility of aforesaid context, given that it constitutes a member of a European youth network which enumerates more than 30 members).

- Additionally, in case the organisation is able to apply, I would like to ask you if we could engage another entity (pg.17) as subcontractor and if the latter need to have a legal link with our organisation.

- Finally, I would really appreciate it if you could clarify the definition of "legal link" because even though I read MGA (article 14), it is not clear to me.
I thank you in advance and I remain at your disposal.

=> ANSWER 7:

We are thankful for your interest in the call for proposals EP-COMM-SUBV-2022-PAN-EU-E intended to the European Elections 2024.

At this point of the stage we cannot evaluate the eligibility of candidates. However, we are pleased to solve your doubts in order to apply for this Call for Proposals:

- Regarding your first question, entities must demonstrate that they are a formal part of a network of organisations sharing common values and represented in seven or more Member States. In this context, applicant organisations are requested to upload their statutes in their application. It can either be the Statutes of your organisation as a pan-European membership entity which is a formal part of a network of entities sharing common values or the Statutes of the entity representing formally the interest of a wide group of member entities of which your organisation is part.

- About the second point, we encourage to review the last paragraph of the point 9.1, as it states that both affiliated entities and subcontractors are allowed in this call. In the case of affiliated entities (defined in the point nine) you will have to evidence an existing legal link on a later stage. On the other hand, entities that are required for the sole purpose of the action such as subcontractors, are not considered affiliated entities and therefore there is not any legal link to demonstrate but they have to be clearly included in the proposal.

- Last but not least, you can find the definition of "legal link" for affiliated entities in the point three (3) of the Guide for Applicants that we encourage to take a look, as it considers three notions depending of each case: control, membership and some specific cases regarding public bodies.

If you have more questions about this Call for Proposals, do not hesitate to contact us again.

QUESTION 8:


The Call document states in the section 9 Eligibility:

"9.1 Eligible participants
The actions supported under this call are mono-beneficiary actions. This means that there is one legal entity applying for a grant. Applications presented by consortia are not eligible. To be eligible for a grant, applicants must be able to demonstrate that they are:

- A pan-European civil society organisation1,a pan-European youth organisation2, pan-European trade union, pan-European think tank, pan-European business or trade association or a pan-European professional associations. For the purpose of this call, the concept of pan-European refers:
To either pan-European membership entities which are a formal part of a network of entities sharing common values. Only entities part of a network represented in seven or more Member States can present proposals to this call; or to entities representing formally the interest of a wide group of member entities or individuals from different Member States. Only entities with members (organisations or individuals) from seven or more Member States can present proposals to this call.

- A legal person constituted and registered as not for profit entity or equivalent according to the national legislation, for at least three years at the time of application;
- Based in one of the Member States of the European Union;
- Legal person with nonpartisan political affiliation (Political affiliation means membership or close association with a political party).

Further down the line the section 9.2 Non-eligible participants states:

“The following entities are not eligible: natural persons, universities and schools, international organisations, EU bodies, public authorities and profit making entities. In line with the non-political affiliation criteria (see section 6.1), entities which would have Members of the European Parliament holding executive functions on their administrative Board or any other executive body of their organisation, would be declared ineligible to the call.”

We ask to confirm that the above information, specifically related to having MEPs as part of the board, will not be grounds for exclusion for this specific grant.

=> ANSWER 8:

As provided in section 9.1 of the call for proposals, one of the eligibility criteria for applicants is to have no partisan political affiliation. Political affiliation means membership of or close association with a political party.

For this reason, as referred to in section 9.2 of the call for proposals, “entities which would have Members of the European Parliament holding executive functions on their administrative Board or any other executive body of their organisation, would be declared ineligible to the call”.

In this context, “holding executive functions” refers to Members of the European Parliament having the capacity to have a dominant influence de jure or de facto on the decision-making of the organisation.

The grant applications will be assessed by an independent evaluation committee, which will take a decision concerning the eligibility of applicants based on the criteria set out in the call. In addition to the minimum documentation required in the call for proposals, please note that applicants may enclose in their application other supporting documents providing further clarifications on the role and the nature of the involvement of the MEPs in their organisation.
QUESTION 9:

I am reaching out to you in light of the calls EP-COMM-SUBV-2022-PAN-EU-E (see attached) with a specific question on subcontracting. I have engaged with all supporting documents to the calls but failed to find an answer to my question.

My question is: **do the calls allow for organisations to be engaged as subcontractors in more than one submission?** Those multiple submissions would, of course, be put forward by different (eligible) pan-European organisations.

=> ANSWER 9:

After carefully reading your question, we understand that it concerns the possibility for a subcontractor to be included in different proposals submitted under the same call.

In order to solve your query, we inform you that subcontractors are allowed to participate in different proposals as long as their participation in the tasks of the action is clearly indicated in each proposal, duly justified due to the nature of the action and necessary for its implementation and the estimated costs of subcontracting are clearly identified in the estimated budget.

Please also note that subcontractors cannot implement core tasks of the action as clearly set out in point 13.3 of the Call for Proposals and have to respect the limitations to subcontracting described under point 3.f of the Guide for Applicants. In particular, the subcontracts must be awarded according to the best value for money principle, or lowest price, while avoiding conflict of interests.

QUESTION 10:

I’ve noticed that the current ongoing call mentions either 1) capacity building actions or 2) citizen engagement activities. Although the production of a tv programme focusing on EP ongoing work has the scope of engaging with citizens particularly through social media platforms, it is not really an ‘activity’.

Could you kindly guide whether TV productions would fit such a call? Are specific calls for TV productions in the pipeline?

=> ANSWER 10:

We would like to refer to the page 5 of the call where it mentions that in this call for proposal, the European Parliament supports two type of activities:

- Capacity building activities (...) and
- Communication actions or series of communication actions, offline and/or online, dedicated to engaging with event participants about the European elections 2024 and supporting democratic engagement among citizens.

TV productions can be in the scope and be considered as engagement activities, provided that they are able to demonstrate that they are (section 9.1 of the call):
- A pan-European civil society organisation[^1], a pan-European youth organisation[^2], pan-European trade union, pan-European think tank, pan-European business or trade association or a pan-European professional associations. For the purpose of this call, the concept of pan-European refers:

- To either pan-European membership entities which are a formal part of a network of entities sharing common values. Only entities part of a network represented in seven or more Member States can present proposals to this call;

- or to entities representing formally the interest of a wide group of member entities or individuals from different Member States. Only entities with members (organisations or individuals) from seven or more Member States can present proposals to this call.

Please note that there will be one media call for action grants during the autumn 2022. This call is planned to be published during the 3rd week of October 2022.


**QUESTION 11:**

Could you please tell us more about the eligibility requirements?

- Are the private companies eligible to apply?
- Do we need specific partners? If so, how many partners?
- What kind of projects are eligible?

=> **ANSWER 11:**

At this point of the procedure, we cannot evaluate the eligibility of candidates. Indeed the evaluation of the eligibility will take place once the term for submissions is closed and the phase of evaluations starts.

We would like to refer you to section 9 of the call for proposal which details the eligibility criteria:

- As indicated in section 9 of the call, private companies are eligible to participate. However, they must be constituted and registered as **not for profit or equivalent** under the national legislation for at least three years at the time of the application.

- As indicated in section 9 of the call:

[^1]: A civil society organisation is an organisational structure whose members serve the general interest through a democratic process, and which plays the role of mediator between public authorities and citizens, cf [https://eur-lex.europa.eu/summary/glossary/civil_society_organisation.html](https://eur-lex.europa.eu/summary/glossary/civil_society_organisation.html)

[^2]: Youth organisations are youth-led, non-profit, voluntary and participatory non-governmental associations, cf [https://pip-eu.coe.int/en/web/youth-partnership/glossary](https://pip-eu.coe.int/en/web/youth-partnership/glossary)
• only entities part of a network represented in seven or more Member States can present proposals to this call;
• or entities with members (organisations or individuals) from seven or more Member States can present proposals to this call.

So applicant should have "partners" in seven or more Member States.

- On page 8, 10-11 of the call you will find examples of communication actions that are eligible. As a result of the pan-european requirement set out section 9 of the call, the project should be implemented in at least seven member states.

QUESTION 12:

Is it possible for you to say if there will be more EP Communication grants (or similar ones) targeted at boosting civic engagement for the European Elections 2024?

Second question, is it possible to be a subcontractor / join in a consortium with a partner who is fully eligible and would act as main applicant?

=> ANSWER 12:


Concerning your second question, the actions supported under the call EP-COMM-SUBV-2022-PAN-E-U-E are mono-beneficiary actions. As indicated in section 9 of the call, this means that there is one legal entity applying for a grant and applications presented by consortia are not eligible. Likewise, the grant agreements will be signed with only one beneficiary.

However, as indicated under the same section of the call, other entities may participate in the action and this should be clearly stated in the proposal. Other entities that may participate in the action include affiliated entities and subcontractors.

An affiliated entity is a legal person that has a link with an applicant/beneficiary, in particular legal or organisational, which is neither limited to the project nor is established for the sole purpose of its implementation. For example, an affiliated entity would be a national youth organisation member of a youth platform introducing the project proposal. The legal and capital link defining the affiliation encompasses three notions depending of each case: control, membership and some specific cases regarding public bodies. Affiliated entities can participate fully in the grant, implement part of the action tasks attributed to them and charge costs and contributions to the action under the same conditions as the beneficiaries. For more information please see Guide for applicants– in particular, 3. Participants : Roles and responsibilities, p.4.

A subcontractor is a third party that will implement part of the action tasks though a procurement contract with the beneficiary. Subcontractors are not considered affiliated entities.
and therefore there is not any legal link to demonstrate. As indicated in the call (see point 13.3 Budget categories and cost eligibility rules of the call, p.25), subcontracting is allowed except for the project's core tasks and subject to strict limits mentioned in the Guide for applicants. Subcontracting of 30% or more of the total eligible costs will be subject to a subject specification, except otherwise specified in the call. Subcontracts must be awarded based on the best value for money or lowest price, while avoiding conflict of interest (please see Guide for applicants, f) Subcontracting costs (category B), p.27).

Please note that under "capacity building actions", the capacity building programme must be organised and provided by the beneficiary. To this end, the beneficiary may hire external trainers or a training company to train the change-makers. However, the use of these subcontractors should be limited to the trainings (see 3.2.1.1. Selection and training of EU elections Change-makers of the call, p.8).

QUESTION 13:

I have two questions about the eligibility to apply (article 9 of the call).

- We are a French organization carrying out youth action throughout Europe with partners in several Member States (without forming a formal network with these partners). Even though we are a French association we have volunteers, members of the association, present in more than 7 member states.

We are also member of an important association which is itself the French branch of an European political organisation, which is represented in more than seven Member States. So we have no direct link with this international organisation but indirectly through their French branch to which we are affiliated.

I would like to know if these conditions may us eligible to apply?

- My other question also concern eligibility: Could an informal network of associations present in several Member States be eligible to apply?

=> ANSWER 13:

We thank you for your interest in call for proposal EP-COMM-SUBV-2022-PAN-EU.

At this stage, we cannot confirm the eligibility of candidates. Indeed the verification of the eligibility will take place once the submission period ends. We understand that your question concerns the eligibility of your organisation for this call. At this stage, we cannot evaluate the eligibility of candidates. Indeed the evaluation of the eligibility will take place once the deadline for submissions is closed and the phase of evaluations starts.

Nevertheless, we remind you that, among the eligibility criteria mentioned under Point 9 of the call, it is requested that applicants must be able to demonstrate that they are: pan-European civil society organisation, a pan-European youth organisation, pan-European trade union, pan-European think tank, pan-European business or trade association or a pan-European professional associations. For the purpose of this call, the concept of pan-European refers:
To either pan-European membership entities which are a formal part of a network of entities sharing common values. Only entities part of a network represented in seven or more Member States can present proposals to this call;

- or to entities representing formally the interest of a wide group of member entities or individuals from different Member States. Only entities with members (organisations or individuals) from seven or more Member States can present proposals to this call. Therefore, civil society organisations are encouraged to apply only if they fulfil and formally demonstrate the above described pan-European criteria.

We would like to draw your attention that entities must demonstrate that they are a formal part of a network of organisations sharing common values and represented in seven or more Member States or that they formally represent the interest of a wide group of members of individuals from seven or more Member states. In this context, applicant organisations are requested to upload their statutes in their application. It can either be the statutes of your organisation as a pan-European membership entity which is a formal part of a network of entities sharing common values or the statutes of the entity representing formally the interest of a wide group of member entities of which your organisation is part.

Consequently, an informal network of entities would not be eligible.

**QUESTION 14:**

We are also applying for an EU operating grant for the year 2023 in which we are also going to include activities for the 2024 EU elections in it.

My question is if we are applying for this call from the EU Parliament, then can it be considered double funding?

=> **ANSWER 14:**

We understand from your question that your organisation applies for an operating grant managed by EACEA for the year 2023 and that your work programme for that year also includes activities for the 2024 EU elections. Under these conditions, you ask whether applying to the call [EP-COMM/SUBV/2022/PAN-EU-E](#) could lead to a situation of double funding. Indeed according to Article 191 of the Financial regulation, each action may give rise to the award of only one grant from the budget to any one beneficiary and under no circumstances shall the same costs be financed twice by the budget.

As mentioned in the call (under point 15), combination with EU operating grants is possible, if the project remains outside the operating grant work programme and you make sure that cost items are clearly separated in your accounting and NOT declared twice.

Therefore, combination of an operating grant with an action grant under this call would be possible if the proposed action is carried out on the top of your normal activities as described in the work programme for the operating grant. For example, it could be a new area of activity...
which because of its scale, objective and/or context is separated from your usual activities and is allocated to its own specific budget and work schedule. In that case, it is necessary that the operating grant and action grant are monitored and controlled separately with appropriate management and accounting tools, and in particular identification of costs incurred according to their destination (operating grant or action grant).

In any case, as indicated in the *Guide for Applicants* (p.30), a beneficiary receiving an EU operating grant cannot charge to the action grant any direct costs for the reporting periods covered by the operating grants, unless it is able to demonstrate cost separation (i.e. that the operating grant does not cover any costs that may be claimed under the action). To demonstrate cost separation, the following conditions must be fulfilled:

- the operating grant may NOT cover 100% of the beneficiary's annual budget (i.e. it may not be a full operating grant)
- the beneficiary must use analytical accounting which allows for a cost accounting management with cost allocation keys and cost accounting codes AND must apply these keys and codes to identify and separate the costs (i.e. to allocate them to either the action grant or the operating grant);
- the beneficiary must record:
  - all costs incurred for the operating grant (i.e. personnel, general running costs and other operating costs linked to the WP) and
  - all costs incurred for the action grants (including the indirect costs linked to the action)
- the allocation of the costs must be done in a way that leads to a fair, objective and realistic result.

If a beneficiary cannot fulfil these conditions, it must EITHER terminate the operating grant, in order to sign the action grant with indirect costs OR keep the operating grant, but sign the action grant without indirect costs.

Please note that applicants are required to indicate in their application the sources and amounts of EU funding received or applied for in respect of the same action or part of the action or for their functioning during the same financial year as well as any other funding received or applied for the same action.

**QUESTION 15:**

We have been asked to create a network of all the former winners of a Prize.

As such, this network (just created, and so no formalized yet beyond the desire of its creation) is structurally represented in the 27 Members States

Indeed, there is one winner per Member State each year. As such do we qualify, in this sense, for the Maximum 250K€ grant, even if it's just one of the Organization of the Network, who do the formal demand, in the name of the Network (which has currently no legal status)? The idea is to get the grant through the request of one NGO, for all the members of the network to then be active in the actions.
=> ANSWER 15:

As already mentioned in our previous replies, we cannot confirm the eligibility of candidates as verification of the eligibility will take place once the submission period ends.

We would like to refer to the pan-European requirement as an eligibility criterion mentioned under Point 9 of the call, and in particular, that entities must demonstrate that they are a formal part of a network of organisations sharing common values and represented in seven or more Member States or that they formally represent the interest of a wide group of members of individuals from seven or more Member states.

Consequently, an informal network (i.e., not yet formalised in the absence of legal status) would not be eligible.