**Workforce 3One**

**Transcript of Webinar**

**Finishing Your TAACCCT Grant Successfully:**

**Understanding Round 2 Grant Closeout**

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CHRIS WATSON: At this point I'd like to move us to our PowerPoint and introduce our moderator today, who is Sharon Leu. Sharon is a workforce analyst here in ETA at the Department of Labor. Sharon, why don't you take it away?

SHARON LEU: Thanks, Chris, and hi, everyone. Welcome to "Finishing Your TAACCCT Grant Successfully." This is grant closeout for TAACCCT round two grantees.

So as we close in on the third year of your grant we wanted to check in with all of you to see how you're doing and to help you think through how to approach your final year. So this is not meant of course to get to be a signal that you should start closing out but just a preparation for the final year.

Before we get started, though, I wanted to thank all of you from us at ETA. We know how difficult it is to implement a DOL grant and a TAACCCT grant. There are a lot of reporting requirements. There are issues with consortia management and many other administrative requirements. But despite all of this, all of you have managed to really accomplish some important things for your colleges, for the workforce system, and for your states. So thank you for that.

In the next hour we'll be covering a large number of topics very quickly. Just know that you do have one entire more year and one quarter, so a lot of time actually to work out the details and that all of us at ETA are committed to helping you all the way through to the end. So this includes your FPO who will continue to be your primary point of contact, all of us on the TAACCCT team in DSI, as well as the closeout team from our Office of Grants Management who is joining us today.

I also have some resources in the file share for you, an FAQ on grant closeout, which is a pretty extensive list of the questions that we have received not just from TAACCCT round one grantees but from grantees in some of our other grant programs, and also a fiscal checklist that will make a little bit more sense to you later when we get to it.

So let's go to our agenda for today. And I don't want to make light of your mortality or anything, but as you come to the close of anything, including your life, there are some pretty common questions that you tend to ask yourself. So the first question that you ask is, what have you done with your time?

And to answer that we'll discuss final progress reports and performance reporting. Another question is, what do you have to show for your time? And to just sort of answer that we'll discuss final grant products and deliverables. Third question, who gets all my stuff when I'm gone? And that's where we'll have the Office of Grants Management come talk about the fiscal closeout process and equipment disposition.

And finally, which is a really important question here, is, what is my legacy? And we have a list of challenge questions for you. You probably won't be able to answer these right away on this webinar, but just as you enter your final year to be thinking about some of these legacy-related questions.

So let's get started with what have you done with your time. So final performance and progress reports, according to the SGA and the TAACCCT reporting requirements, the last quarterly progress report and the last annual performance report will serve as your grant's final performance and outcomes report.

So what we're going to do is we're going to just very quickly, no later than 45 days after the end of your reporting period – so your grants are scheduled to end on September 30th, 2016, which means that your final quarterly narrative progress report is due no later than November 14th, 2016 and your final annual performance report is due no later than November 14th, 2016.

As with all reporting, it's good to start early, but in this case you should start early because you want to avoid being locked out of the system and to give yourself to make any final corrections because this really will be your final chance for reporting. So okay.

So let's look really quickly at what to report. According to the SGA, the last quarterly progress report is both your grant's final performance report as well as the quarterly report. So on the last QNPR you're going to be reporting information on the grant activities that occurred during the final quarter as well as cumulative information on all of your grant activities during the entire period of performance.

What that means is, for example, if you had as one of your implementation measures that you would provide mock training for 1,000 students, you would be reporting on that implementation measure every quarter. If in the final quarter of your grant you conducted mock interview sessions with 225 students, you would need to report that number to us. However, since you will also be providing a cumulative total of all of the students, you would need to tell us that you served, for example, 1100 students, if that was your total.

OK. In the same way, the annual performance report is – sorry. Not in exactly the same way but your annual performance report will also provide grant activities on the time period since your most recent APR.

So for round two, which you are, all of you received a one-year extension, which means that you will be activities of the third year of your grant. Your final APR then will reflect all of the activities since your third-year APR, that is the fourth year activities in addition to any activities that occur during closeout period. And this final APR should be submitted by November 14th, 2016.

So let's go to a couple of questions that we've heard recently and frequently. So if a student who completed during the grant period finds employment afterward, can I still get credit for it? In other words, if you achieved additional outcomes during the closeout period, can you still get credit? And the answer is yes.

If you have outcomes during the closeout period, which is the period after your grant ends, you should report that on Section H, additional outcomes information, of your quarterly narrative progress report. So even though employment is an outcome that you would normally report on your APR, you would report anything that happens during the closeout period on your QNPR when you submit that.

So Gail has a question, and I'm just going to take it now. And again, as I'm talking I know that we're going to be flying through a lot of material today quickly. So please feel free to type in questions into the chat. Gail has a question about extensions. So all of you have received an extension for program activities through March 31st. "Are these reports due in June?" And the answer is no.

The reports are due in November when – according to the previous slide. So even though – so this is a little bit tricky with your grant. You have technically the fourth year anyway as your period of performance. The extension was not in the length of the period of performance but in the length of time that you had available to do program activities.

In the original SGA the design was for the fourth year to be reserved exclusively for data collection and evaluation activities, but what we're saying is that you can continue to enroll and serve participants through March 31st of 2016.

In any case, those activities, in addition to your data collection and evaluation activities, would be reflected in your final APR, which covers the period all the way through September 30th, 2016. And so your final APR would be a report of all of the activities that occurred through the fourth year of your grant. I hope that helps. Probably not, but we can talk a little bit more about that later.

So going on to the next slide, basically a review, outcomes achieved during your final closeout period after the grant ends on September 30th, 2016 should be reported in Section H of your QNPR.

So a quick question from Karen. "Has the APR had its OMB update?" The OMB update doesn't actually affect the reporting elements. We have put in for an update basically that just extends the period that you're required to report. You're required to report regardless of whether the OMB form is valid. So that doesn't affect you one way or the other.

So let's go to the next slide. OK. So what do the numbers tell you about how you did? So on your APR you'll notice that we've added something called a thermometer, and this is just to help everyone get on the same page about what it is that you are doing. Obviously your programs are very different, but this is sort of the standardized performance targets that were in your statement of work when you applied and how we think you've been doing so far.

There are instructions on this link here in the community of practice for how to interpret that report. Please do speak with your FPO if you have any concerns about the targets that we have reflected there or if you don't understand or think that you're doing differently than what our targets sort of reveal about you.

OK. Go to the next. OK. So what will you have to show for all of your time and hard work? And I hate to distill that all down to the product submission process, but that is just kind of a fun way of getting at that. We're not going to spend a lot of time here on the technical details of submission.

We have had and will continue to have webinars with the SkillsCommons.org team as well as the Creative Commons team that will help you with the technical part of this. But we do want to take – do a quick overview of our expectations on your SGA requirements and take some questions about how and when to submit.

So right now you have it drilled into your head that your grant products and deliverables are required to have a Creative Commons 3.0 Attribution License, and in addition you will release all new source code under open license acceptable to either the Free Software Foundation or the Open Source Initiative. And again, this is all works that are new that you created with grant funds and any modifications made to the preexisting content used during the grant.

In addition to the products themselves, you were required to conduct a third-party review of your deliverables, and these will also be submitted to the TAACCCT repository. Grantees have done it a number of different ways. You can attach the third-party review of deliverables as a program support material or right alongside your learning resource so people know what it's tagged to. Either way, just let us know what you're planning to do.

So again, the next slide just shows the link to the TAACCCT repository that you will be submitting your products and deliverables to. We encourage you to begin the upload process as soon as possible, and there are a number of good reasons for this. The first reason is you want to have practice doing it, and we have a lot of technical assistance resources available to you to help train you and your staff on how to properly mark your content and upload it. And also we want you to have the opportunity to be able to share your materials more broadly and pointing to the site is one excellent way that we have been using here in the national office to do that.

So just a couple of FAQs. OK. So we've received a lot of questions about which license to use, and one of the questions that we've received is, can you use the Creative Commons 4.0 Attribution License instead of the 3.0 license? So the answer is yes. You can do it, but do you have to use the 4.0 license if you've already licensed under 3.0? And the answer is no.

So 4.0 is obviously an updated version of the 3.0 license. It's a little bit more extensive in what it covers and in the privileges and rights that you have when you use it, but since the SGA only said 3.0, we're not going to make you relicense everything you've licensed already because that can be a workload-generating item. The two licenses are compatible with each other. So it's completely up to you.

OK. Let's go to another question. "Please clarify the type of items that are considered to be grant deliverables." And in the FAQ a little bit more expanded. So definitely walk through that and with your FPO as well. According to the SGA, the department considers curricula, course materials, teachers' guides, and other products developed with grant funds to be grant deliverables.

These items were usually identified in your statement of work, and then because of that you had identified them in your work plan to submit within your period of performance. And those are the items that we consider to be grant deliverables.

Now, there's a question about marketing materials and outreach. OK. So sorry. That's a little bit unrelated. Let's go to another question first before we get to that. So this is again going back to what we touched on earlier. "How do you submit the subject matter review of deliverables?" So you can add them to your SkillsCommons.org site.

Let's see. And then, "Are outreach materials and other program support material is considered grant deliverables?" The answer to that is a little bit complicated, and you'll find that in the FAQ in a very expanded form. The short answer is that outreach materials and other program support materials are not necessarily your grant deliverables.

So you're technically not required to send them to us. However, we have found that in a lot of cases some of the materials that you produce that explain what your content is make it helpful as other people try to reuse your materials.

So, for example, if you have a syllabus or a course map or some other materials that describe your program of study that aren't the content themselves but that help others use the content, we would encourage you to submit those because we think that we would like the – the purpose of the repository is for you to share, and we would like to make your materials more shareable.

Another way to look at this is if you were looking at something that one of your other – the grantees in your cohort were – sorry. If you were looking for materials and you stumbled across the Skills Commons site, what information would you like someone else to have put on there to help you? Is it 100 different flyers from every weekend outreach?

Well, probably not because those are interesting but wouldn't necessarily explain your program better. But if it's a directory or information on how you developed the course, that might be helpful. And we have a whole section called program support materials that will allow you to upload that kind of stuff.

OK. Let's go then to who gets your stuff, and I'm going to turn it over to Kevin Brumback who is in the ETA Office of Grants Management.

KEVIN BRUMBACK: Great. Thank you so much, Sharon. And as Sharon mentioned, I am Kevin Brumback, currently with the Office of Grants Management. I am currently with the audit resolution team, and before that you may know me from such roles as the closeout grant office and before that the OIG liaison and long ago I even put grants together as part of the grant unit. So I've been with the Office of Grants Management for a while.

So I'm here to talk about the grant closeout process. I'll be trying to speak clearly and concisely, but if I'm going too fast, going too slow, please give me a virtual nudge and I'll be happy to adjust accordingly. And the slide does reference Avery Malone. Avery Malone is currently one of the grant closeout officers. He's not with us today, and I'll get to a little bit more about some of the closeout unit in just one second.

Great. So let's talk a little bit about what is grant closeout. Well, grant closeout is the completion of the grant life cycle that obviously started with the awards being made, and I want to echo Sharon's sentiments. Again, congratulations on competing against your peers to be awarded and win a TAACCCT award. It is a complex program, as you and Sharon and the team knows, but we know you've done great things to train effective workers and to help your local economy.

So again, congratulations, and we know that things will go smoothly come grant closeout time, which for you all will be over a year away from now. But I appreciate the opportunity to talk to you today and give you some kind of pointers and some heads up about what you'll be experiencing just over a year from now.

So again, what is grant closeout? As I mentioned, it's the completion of the grant life cycle, the official end of the government's relationship with the grantee. The grant closeout requirements are cited in the regulations for you guys at 29 CFR 95 Subpart D, after-the-award requirements, since you all are institutes of higher education.

And why do we go close a grant in the first place? Well, because it's required but not just because it's required but because grant closeout is the appropriate and official record of what actually happened during the grant's period of performance. It's important to keep a record in case there are audits being either A-133 audits, which are required under the regulations, or audits of the programs as done sometimes by GAO or OIG. So it's important to keep records of what happened during the period of performance and what happened in closeout.

It's obviously important to have closeout process so we can report to Congress, OIG, and the other stakeholders for the relative success of the program and to ensure that any unspent funds are returned to the Treasury in a timely fashion. And in today's current climate with the uniform guidance and more and more scrutiny being placed on awards, it's to look at performance during the life of the grant and as used as a possible indicator for future grant awards.

And as Sharon did, as I go through, I'll be happy to answer any questions on any slides as we go. I'll be periodically checking the screen, and I may – or else I may hold off as my – one of your questions is answered later in the presentation.

So a little bit about who we are. As I mentioned, we're in the Office of Grants Management, specifically the Division of Policy, Review, and Resolution. We're under the fearless leadership of Stephen Daniels. The closeout team is lead actually by two grant officers, one being grant team and one being the grant team leader. That is currently Marin Asapa (ph) who's on detail with us, and Avery Malone who is also in grant closeout, as I mentioned earlier.

And when we're fully staffed, there's a team of seven resolution specialists to handle grant closeout. We handle grant closeout for the entire – for all of ETA grants and we close out approximately 700 to 1,000 grants in a year and our busiest month is June, of which last year alone we closed 330 awards. So your awards will be going through our shop for closeout.

And just talk a little bit about how that stuff is going to work, we track and anticipate workload about one year out. So you guys will – you'll be on our radar soon, and about 60 days prior to the period of performance end date of your grant, the closeout office will be checking with the program office and the grant officer, who in this case has been Steve Ridsky (ph), for upcoming grants just to make sure that they are set to close on time, check to see if there's been any period of performance extensions that will delay the closeout process.

Then 15 days prior to the POP end date, the closeout specialist sends an initial closeout notification letter to the grantee letting them know that their grant is about to end and the closeout process will start. And a little bit about that, each grantee will be assigned a specific specialist who will shepherd you through the entire closeout process. And again, they're supervised by two grant officers in the – for the unit.

And some of the frequently asked questions we get asked is about timelines as well for submitting our reports. Sharon mentioned the 45 days after the POP end date for the performance side. So for us, we are looking at the 9130 reports and some additional forms which I'll go over in a minute. So within 45 days after their period of performance end date, grantees should submit their final quarterly 9130 for the last quarter of their award. And on that you should check yes for Box 6.

As you've been doing throughout the period of performance of the award, you've probably been checking no since it's not your final report, but this is the one where you actually check yes for your final quarterly report. Then 70 to 75 days after the POP end date, the specialist will follow up with you as a reminder to make sure that you complete all the other remaining parts of the closeout package, and I'll go over those parts in a moment.

And finally, 90 days after the POP end date grantee must submit the remaining closeout documentation as well as the final 9130. So there's an additional 9130 called the closeout 9130 that's also submitted after 45 days after the final quarterly 9130.

And before we leave this screen, just talk a little bit about your access to PMS and your ability to draw down funds. It's a common question we also get. So just as you have been doing throughout the life of the award, you can freely draw down funds and then report at the end of the reporting quarter on what's been expended.

This process is the same in closeout. You still have free access within the first 90 days after the POP end date to draw down funds and to subsequently report that. Now, we'll get to what happens after that in just a moment.

So here are some of the forms – these are the forms to be submitted as part of your final closeout package. I'll go over in a little bit of detail what each one is, but this is just to give you a heads up of what you, as a discretionary grantee, are going to have to complete.

Great. So what happens after the first 90 days after the grant ends? Well, that's where the fun begins, and that's when the grant closeout staff and closeout specialist is working with you as the grantee to make sure you have all the completed forms and that the financials match up with what's been reported in PMS.

We're going to make sure you adhered to the grant program requirements and to the other requirements under the grant award.

Timeliness for our grants. All grants should be closed within one year after the POP end date. That's a Department of Labor Manual Series standard. And just a heads-up for those of you who we're going to be dealing with – have already started dealing with the new uniform guidance. The uniform guidance actually gives closeout a little bit more time. We have one year plus 90 days to closeout.

However, here in the – sorry. There's a cart rolling by in the hallway. I'll let that go by so you can hear me. I do see equipment questions coming up. I'll get to equipment in just a moment. Be patient. Yes. I was talking about closeout timelines. However, we here are a little gung-ho in closeout about closing out awards.

We aim to close out all of our awards within nine months of the period of performance end date, and I will have the slide – I believe my next slide covers those timelines. Oh, it's the last – so that's actually from a previous presentation I did this week. I'll get the new timelines for you, but basically add one year to everything on that list. So for you guys it's going to be November 13th of – or November 15th of 2016. No. I guess that would be –

MS. LEU: November 14th. It's the 13th for round one because the 14th is on a Saturday.

MR. BRUMBACK: Right.

MS. LEU: Right.

MR. BRUMBACK: So yes. Just add one year to everything on that list right there – sorry about that – except for the June 30. That will be June 30th, 2017. So we'll get that corrected and sent out to you for the new timelines, but we've got plenty of time to meet those deadlines.

Just a few screenshots on what you'll be seeing as you start to go through the process. This is a screenshot of a notification letter. This just notifies you as the grantee that the upcoming grant closeout process is about to start. That's submitted from your specialist to you to your authorized official in your organization.

This is a screenshot and an attachment noting that you will – giving you access to the grant closeout system and the user manual. The grant closeout system is a separate system, separate and apart from e-grants where many of the forms you'll be needing to fill out will be housed.

This is a screenshot of a submission confirmation letter. This is sent by your organization automatically once your organization has submitted the required forms in the grant closeout system, not including the 9130 which is in the e-grant.

Preliminary settlement letter, this is the good news. This is when you've – this is sent to you by the DOL once your organization has completed grant closeout. So this is kind of your official letter from the grant office allowing – as your record that the grant has closed, and it does list some exceptions when – that does not let you off the hook.

Even though the grant is closed, we do have the right to disallow or recover any funds later as found to be in audit or other findings against your grant. And just because the grant is closed, you're not off the hook to return federal funds that may come back to you as a result of a refund.

And you still are responsible for retaining your grant records that you've collected during the period of performance of your grant. And Sharon may go over that in a little more detail later, but in general the requirements specify that you should keep your records for three years after the grant has ended.

And this is screenshot actually from the grant closeout system notifying you – these are the links that actually take you to the different forms within the grant closeout package. The grantee detailed statement of cost is a very important part of the closeout package. I'll have a screenshot of that in a moment, but that indicates how the funds were spent in accordance with the approved budget categories.

Grantee's release, the purpose of this form is to relieve ETA of any future financial obligations under the award. It's a boilerplate form. It's applicable to all of our grants and agreements. The grantee's assignment of refunds, rebates, and credits, this form documents the grant recipient certification that any refunds, rebates, or credits received after the closeout will be returned to ETA. Excuse me. The government property closeout inventory certification, this is applicable to all of our grants. This applies to equipment that was purchased during the award, and I'll get to equipment in just a moment.

Grantee's closeout tax certification, this is your self-certification that all the required taxes have been paid in the city, state, and county in which the recipient operated its program. And the grantee's submittal of closeout forms, this is a – it's a completed checklist. It's completed by you as the grantee as part of your closeout package.

This is a screenshot of the final quarterly 9130. It should look very familiar to you. It looks just like all the 9130s that you've been completing thus far, and don't worry if you can't read the numbers. But just to let you know, this is the one that's completed within 45 days after the period of performance end date.

As you can see in the layout, it's previous period, this period, and cumulative. So the this period reflects, for this form, the fourth quarter expenditures, and the cumulative would be the cumulative of the entire grant thus far. So in this example fourth quarter expenditures were just over $227,000, and $1.245 million cumulative expenditures.

So this next form is – this one will be new to you. This is the closeout financial report. So this is the one that's due 90 days after the period of performance end date or 45 days after your final quarterly report. This one you won't see until the very end of the – until the end – until we get to closeout. So this example there is – the first column is the cumulative ETA 9130. That's $1.245 million. That's amounts that have been reported by you during the period of performance. There's a cumulative closeout column, the middle column. That number actually reflects $1.257 million for a final total adjusted amount of $1.257 million.

So you may be asking, well, gee, what happened? Why is the – why did the number go up? The grant has ended, but why is there an amount that's adjusted upwardly since the grant has ended? And don't be alarmed. That's very common. Sometimes that's a result of invoices for costs incurred during the period of performance but you are not liquidating it in closeout.

Could be as a result of funds that you were drawn down for payroll for obligations that occurred during the period of performance but you liquidated during the closeout period. Could be the grantee waiting for your final indirect cost rate, which could have your expenditure amount higher or lower. Could be the result of refunds which you got back to the grant, which would reduce your amount of expenditures. So just to let you know that – just to make you – at this part, since you're so far out, just to make you more or less aware that there is additional reporting after the grant period of performance of the grant.

Great. And one of the things that we'll be looking for, again, as I mentioned, in closeout is the liquidation of obligations that occurred during the grant period. Yeah. And that's covered in the FAQs that were given to you. Unfortunately, you should not be incurring new obligations in grant closeout.

You should only be liquidating obligations that incurred during the period of performance of your grant, and this includes even closeout-related activities. So the cost of staff that are working on grant closeout activities, those costs should not be incurring new obligations during the closeout period. And again, that is covered in your frequently asked questions.

And this slide labeled compliance and this little bit of taste of what we look through at the grant closeout period, in this example it's hard to read but in general the cash receipts, 10a is the amount that you've drawn down. Cash disbursements is the amount you reported as expended, and the cash on hand is the balance, which is zero, which is what we always like to see in grant closeout.

We don't like to see that you have any cash remaining on hand. And in this example 10e, the federal share of expenditures, it also matches the cash receipts and cash disbursement. So that's what we like to see in grant closeout. We like to see that what you've drawn down and what you've spent and – all matches up, that we have no confusion of discrepancy.

And this slide is the same numbers. It just discusses a little bit about the administrative costs. One of the things that we definitely look at in grant closeout is your compliance within the administrative cost limitations. And as specified in the SGA, grantees are limited to 10 percent of the grant award amount. So we'll be looking at the math for what you reported on 10f to make sure it's within 10 percent of the grant award amount.

And talk a little bit about – this is – the next screen is the detailed statement of cost that I mentioned earlier. This is again a form you won't see until you get to grant closeout, but what this is is this compares the budgeted expenditures that have been approved during the period of performance of the grant with the actual expenditures that you're reporting.

And similarly to what's done during the period of performance, the specialist will be looking to make sure that you've complied within the limited flexibility that you have. So if there are any changes that you report to salaries, wages, fringe or indirect costs, those costs have to be explained and justified and you have to get concurrence from your FPO.

You do have some limited flexibility with your other line items, such as travel, supplies, other, or contractual. If there's any adjustment between the approved budget and the cumulative cost reported, you get 20 percent flexibility, and this is definitely a part of the form that we'll be looking to make sure is completed. And if there's any discrepancies or questions, we'll be working with you and our FPOs to resolve.

I did have a question on, "Please restate/clarify which costs may be incurred during the closeout period." Again, as I stated in a previous slide, you should not be incurring any new costs during grant closeout. You're only liquidating costs that incurred during the grant period. So let me know if you – so an obvious example would be you're purchasing a brand-new piece of equipment. Well, no. You shouldn't be purchasing equipment during grant closeout, or you shouldn't be performing programmatic-related services during grant closeout.

So talk a little bit about realignment. Go back. And I've already touched on this briefly. There are budget realignments that are allowable in closeout, as I alluded to on my previous slide. You are – you may be allowed to, with some flexibility, to remove some of the expenditures approved in your approved budget. However, it does need to be provided in writing and approved by your FPO, and that is a process that we work on with you as well as our regional counterparts.

All right. Talk a little bit about indirect costs. Indirect costs is one of the more challenging things that we in grant closeout work on. It's a complicated area and in – but we will say that our first cohort of TAACCCT grants, small, limited sample, but it did go through smoothly. But for indirect costs it's pretty clearly spelled out in your grant award and also in the technical assistance we provided at the beginning of the TAACCCT program and throughout the SGA.

For any organization claiming indirect costs, we'll be looking for the approved indirect cost rate of your organization. We'll be looking to make sure that the rates match up. So if you claimed indirect costs throughout the life of the grant, we'll be asking you to complete a relatively simple worksheet that kind of details how you intend – how you have been claiming indirect costs throughout the period of performance of the grant.

And for those of you who have co-leads, co-grantees, we'll be looking for the indirect costs rates for those grantees as well.

All right. Talk a little bit about equipment. Thank you for those of you who had questions about equipment. We've got it here. I'll be happy to take – we're still doing good on time. So I'll try and go through this part a little slower. So this slide is entitled property certification form, but for the purposes of this slide we're really talking about equipment, not real property. Certainly hope that none of you have purchased real property with your TAACCCT award.

So for the purposes of equipment, what we're talking about here is any item of equipment that has a per unit value of $5,000 or more and a useful life greater than one year. I know you're very familiar with that because you guys have been submitting your property requests through your FPO throughout the period of performance of the grant.

So you should have a good record of the property that you have purchased throughout the life of the grant. So you may be wondering, well, gee, what happens to that property now that the grant is ending? Basically the regulations require that you must notify us what you intend to do with that property.

Now, the way that that property is determined – the equipment is determined is any of that equipment that has a current fair market value at the time of closeout of $5,000 or more, that's still considered equipment and you have to let us know what you intend to do with it. You have a few options. You can retain it for current grant-related purposes. So if you've been using it in your lab or using it on site in your classroom or using it in your organization to serve the grant purposes and it's already been approved, then you can continue to use it for grant-related purposes.

Now, because the TAACCCT program does have a significant amount of equipment in general that has been purchased, we may ask for a little bit more documentation than we had in the past. Everyone is required to fill out the grantee equipment declaration form, which is – as the screenshot on the screen, it's relatively basic. Asks for an item description, serial number, acquisition date, purchase price, and your estimate of a current fair market value, its condition, and what you intend to do, so either retain for grant purposes, retain for other federal purposes.

And so if you're retaining for grant purposes or other federal responsive projects, you just need to let us know. We really appreciate it when we get the heads up from a TAACCCT 1 grantee that we intend to use the TAACCCT – the same equipment for their TAACCCT 2 grantee. That always makes us feel good because, first of all, that's very smart, very efficient.

It's avoiding waste so that you could theoretically have bought the same equipment for your other grantee but you were very efficient and you did not choose to be wasteful. You said, well, that makes sense. I need it for the TAACCCT 2 grant. So I'll look into maybe use it for the TAACCCT 2 grant. And we encourage that type of leveraging, and we just may ask you to describe briefly how you intend to retain that equipment.

Likewise, if for some reason this piece of equipment you think would be better at home and it's still considered equipment, that's fine too, but you just need to compensate the federal government for that. So you need to compensate us the fair share of the fair market value, and I know that's kind of a comical example. We haven't had that happen yet, at least not since I've been here, or you may be entitled to sell or scrap the equipment, and that is you right too.

But in the case that you did sell the equipment, again, the government would need to be reimbursed for their share. And we did have this webinar earlier this week, and one of my colleagues was kind enough to give me a little bit more information.

One of the questions we had was about determining fair market value. Now, obviously you did have to do some research when you purchased the original equipment to get the fair market value in the first place, but how would you determine it now that it's three, four years down the road? You could ask for an appraisal. You could go to GSA Advantage, which is a federal website that is an equipment repository.

You could check with the vendor that you bought. The vendor themselves might know a good estimate or how much the value is worth. So we really appreciate again equipment-related questions this far ahead of time, but we are very confident that you guys will be in good shape and have great records and we'll be happy to help you at any point. Of course your FPO currently can do that, and once you get into closeout the specialist can help with that as well.

I'm going to read this question and try and answer it on the fly. "College/institution equipment inventories are performed in July through September each year. When will we know about disposition of DOL grant-purchased equipment?"

MS. LEU: OK. So I guess the question is what do you mean by when will – when will you know what about disposition of DOL grant-purchased equipment? And this question was asked much earlier. So probably the question was about this particular form. So, Mark, if not, go ahead and type in the chat window if you want to clarify.

Kevin, I think an interesting question is, "Can you also retain it for non-federal grant programs?" And that's from Kelly.

MR. BRUMBACK: Oh, so you want to retain it for state use. I would have to double check on that. I think the regulations are specific for grant purposes or other federally sponsored programs. So if it was for a state program, I'd have to double check on that before I give you an answer. That's a good question. I assume that could be the question since you are – or for community college use. Yeah. Yeah. I'll definitely get back to you with an answer on that one. Good question.

MS. LEU: OK. And Bonnie has a question about residual supplies.

MR. BRUMBACK: "Do we need to return in lists of material supplies purchased under $5,000?" So if you have – if I understand it correctly – question correctly, your organization has a budget line item for supplies, and you – let's just say the budgeted line item for supplies was $4,000 and you need to send in a list of that? No. Anything that's considered – anything that's under $5,000 in supplies is – you don't need to maintain a list and turn that in.

MS. LEU: Great.

MR. BRUMBACK: Good. All good questions, and again, I'm – I know I'm going fast, but part of the reason I wanted to go fast is so I would have time for questions.

MS. LEU: OK. So let's go to the next slide because I think there's some more questions at the end that we want to get to.

MR. BRUMBACK: OK. Great. So just some common misunderstandings. Not picking on you guys at all. This is just common misunderstandings that happen with a lot of our grants. Sometimes the expenditure amounts are higher than the draw down amount. They need to match.

So again, on the slide that I showed earlier, the expenditures and the drawdowns need to match so there's not any confusion at closeout. Completing the equipment form correctly, believe it or not we've seen people that list great detail on what the equipment is and what it does and what serial number and all that stuff but then when they tried to tell us what's going to happen next, they check every box on the form.

So it's completely unclear what they intend to do with the equipment. Grantees sometimes misunderstand it's actually completed as part of the completed closeout package. It's not just the 9130 form. It's all those additional forms that make up the grant closeout package that need to be submitted.

And some common issues which delay closeout. I've discussed in some detail about refunds. Refunds do hang up the process. Now, it is possible to have refunds occur after the grant has closed, but we try and process all refunds during the grant closeout period.

Equipment disposition, as I mentioned, sometimes there's confusion with the form or confusion with guidance or grantees are awaiting guidance from us on what the actual next steps are for equipment or whether it's determined to be equipment. 9130 issues, those could be technical. Those could be policy-related guidance. It could be following up on questions where it's unclear what their intent was or items in the remarks.

Administrative cost issues, grantees sometimes exceed the administrative cost requirements. Indirect cost use, I mentioned it's one of the more complex areas that we work on, and sometimes we need additional documentation. Question and disallowed costs, that's the bad news. That's unfortunately where I am now working the audit resolution team.

A tiny percentage of all of our grants unfortunately have to go through the initial determination or final determination part of the audit resolution process, but I'm sure that won't be a problem with you guys. Non-responsive grantees, also I'm sure that won't be a problem with you guys. Sharon has done a great job during the life of the grant to be as vigilant as possible. Budget realignments, as I mentioned earlier, budget realignments do occur and sometimes those delay the closeout process as well.

I didn't want to spend a lot of time on this slide either because it's relatively self-explanatory, but again, any refunds, either anticipated or unanticipated, that come back to you during the closeout period, you are required to promptly refund those back to the grant, and the specialist will give you guidance on how to return refunds back to the grant either paper check or through the PMS system and they can give you that address information.

MS. LEU: Now, let's do the FAQs really quickly and then the questions after that. I think we do have a bunch more to get through.

MR. BRUMBACK: OK. No problem. Does marking yes on Box 6 on the ETA 9130 trigger the closeout process? No. That's a common misunderstanding. All that does is indicates that this is your final quarterly 9130, but it does allow you access to the closeout financial report subsequently.

The grant ends September 30. When does the grant closeout need to be submitted? When is the – when do we need to submit the final quarterly? It's 45 days after that. And when is the final closeout 9130? It's 90 days after September 30.

When is the last time I can draw down funds? As I mentioned, you can draw down funds with no restrictions within the first 90 days after the POP end, and then after 90 days you do have – you can draw down funds, but your PMS account would be locked and you would need to have special permission from the grant closeout staffer to have it opened.

Can stand-in costs be used to pay disallowed costs? Yes. They can be, if those costs are determined to be allowable for grant activity and were incurred during the period of performance of the grant.

Sorry I had to hurry through that, but we do have some time for FAQs.

MS. LEU: So I guess I just want to make a point. There was a question about what costs can be incurred after. So when we talk about closeout – I guess we weren't clear about this in the beginning – we're talking about closeout beginning the day after your grant period of performance ending and going for the 90 days after. So starting on the day after your grant ends you are no longer allowed to any costs to your grant.

So until September 30, 2016 you can draw down money from your PMS account and use it to pay for whatever you pay for during the grant period. But starting on October 1 you can no longer incur any new charges. This includes what Kevin said before. You can't obviously buy new stuff since you're not allowed to access your account, but a really key point here is that you are not allowed to pay staff anymore starting on October 1, 2016.

So this obviously brings up a lot of questions, which is why we're having this webinar with you so early in advance. A lot of project directors or grant staff that are hired specifically to work on the grant will no longer be considered grant staff because we'll no longer be able to pay for them.

So if they are working with you on any of these elements that we've just discussed, whether it's performance reporting, submitting final products and deliverables, or doing any of the fiscal closeout, then it's in your best interest to have a lot of this taken care of before your grant period ends.

Now, it's not a requirement, obviously, because we don't actually in the national office trigger your closeout process until we notify you about – as Kevin said, about 15 days before your period of performance ends. So technically you don't do it until the day after your grant ends, but just very practically it's very wise to plan in advance for the inevitability.

Now, we had a question from Sharon which is, "Can you upload the work for uploading during the final six months?" Yes. Absolutely. We do encourage you to start early for practice, but you technically don't have to submit your products until September 30th, 2016. So as long as they're all in there on September 30th, 2016, you're fine.

And, Bonnie, I'm sorry. You cannot pay staff after September 30th, 2016. So if you look in your FAQ document on page 2 and 3, I think there are some – on page 3 – sorry – in particular there are some tips on what to do with that, but you cannot charge to the grant after the grant ends.

And then let's see. OK. So we have a question from Jennifer. "What if the college continues the grant-funded program after the grant ends? Would you be allowed to retain equipment for that?"

MR. BRUMBACK: Good question. That's similar to what I mentioned. Yes. That would be part of the form. The form actually says what is considered equipment. You have to fill out some basic information about what it is, and then you'd have to check the box that says, I'm retaining this for current grant-funded activities.

And as I said, for TAACCCT awards you may have to submit maybe even a paragraph that says something along the lines of we intend to continue our trade program or our skills assessment program or whatever you're doing programmatically as part of our current initiative. And again, just a brief justification that says why you intend to – why you need it and why are you using it for the grant work. Good question.

MS. LEU: Great. Bonnie has a question. "Does DOL intend to hold a conference on training for closeout?" Well, DOL does not easily hold conferences, as you know, but we do intend to have several closeout trainings with you throughout the period – the rest of your year. We wanted to tee this one up early so that you can be thinking about some of these things as you enter your final year.

OK. So there's a question from Karen. "Uploading to SkillsCommons.org is an additional requirement, and it's not in the SGA." Well, the answer is yes and no. So SkillsCommons.org is not specifically listed in your SGA as a requirement because SkillsCommons.org did not at that time exist. Your SGA said that we would be telling you how to submit products and deliverables, and this is us telling you how to do it. So that's sort of the answer to your question.

Bonnie has a related question about paying for contracts for data pulling and evaluation during the closeout period. Bonnie, I assume that what you mean is during the grant period you have contractors pulling data and doing your evaluation and that you would need to pay them after they were done and they plan to work until September 30th. So, Kevin, how do you deal with contracts that you pay for until the last day of your grant?

MR. BRUMBACK: Good question. So again, Sharon, correct me if I'm wrong, but for these grants there is an evaluation component and the evaluation component is being funded within the period of performance of the grant?

MS. LEU: Yes. Yes.

MR. BRUMBACK: So at that point you are – the only thing that you would see in closeout would be the liquidation of possibly the last payment to the contractor, but that work was done during the period of performance. So the contractor would not still be assessing students and going out – filling – completing surveys and doing data analysis during the grant closeout period.

MS. LEU: Right.

MR. BRUMBACK: That work would have been done. You're literally just paying for the work already completed.

MS. LEU: Yes. So you could pay for the work already been completed?

MR. BRUMBACK: Correct.

MS. LEU: OK.

MR. BRUMBACK: Sorry. Yes.

MS. LEU: OK. Great. "And to clarify, uploading products and deliverables not – is not considered programmatic. However, if grant-funded instructional designers were doing the uploading, we were under the impression that these programmatic-oriented positions were not allowable during the final six months. Are they now considered allowable during that time for upload only?"

So submitting products can occur up until the last day of your grant. So however you want to pay for that, as long as you let us know, would be great.

OK. And I want to say – so as we get into the next section I want to say one thing. It's really important because of the staffing turnover situation that you keep us apprised of any changes to your key staff. And so what that means is, if you're a project director and you got a new job in anticipation of the end of your grant, it would be great for you to let us know who the person that's replacing you is and who is going to be the – and there are a couple of reasons for that.

So first, we need to make sure on your grant that there is someone to certify your performance reports as well as your fiscal reports because that needs to happen no matter what. There needs to be someone that is the point person in case there are any audit resolution questions and for any other follow up, including evaluation, that's required.

So the Records Retention Act – and this is in the FAQ on page 6 – says that you must keep records of your sort of grant for a period of three years after your period of performance is over unless there is an audit. And this is separate from the A-133 audits that your organization would have to conduct. And when there is an audit, then the records retention resets to the period after the audit as well.

So we have been notified by the Office of the Inspector General that the TAACCCT grant program is being audited, which means that at some time in the next year or year and a half you may be contacted by auditors from the Department of Labor who may be interested in looking at your books as well as any of your programmatic records. And you would be required, following the records retention policy, to turn those over to them as well. So that's sort of just a heads-up, but also let us know what's going on in your grant because that is the way that we can help you best.

So I think we just have a few minutes left. Chris, do you mind scrolling to the – so we have some really important questions that we want you to be thinking about in the last year of your grant, and we'll call these your challenge questions that will help you think about what your legacy will be.

And really you're probably all very concerned about the financial closeout, but we think that this is just – this part about sustaining your legacy is just as important. So let's go to some of the questions, and obviously you won't have the answers to them now. But as you kind of think through the end of your grant, let's be thinking about what is your legacy and how will you preserve it? Can we go to some of the questions afterwards?

So for example, what is your most surprising success, and how have you been capturing that and sharing that? The next, what are your greatest accomplishments or the innovations that have made the biggest impact? How would your partners like the employers that you've worked with, the workforce system, and others that you've worked with consider your project? Would they consider that you've helped them? Yes or no? What are they doing about it? Other questions like what have you done to help your students get jobs; right, because primarily this was to help people get jobs? And then going to the next, are there more? No.

There are no more questions, but we really want – these are sort of the big million-dollar questions, and we would really like to hear your thoughts on how we can be engaged in a conversation about those things as well as questions about audit resolution.

So I think we have one or two minutes for questions. I guess we're not really seeing any questions. Chris, do you want to wrap it up for us?

MR. WATSON: Sure.

(END)