**WorkforceGPS**

**Transcript of Webinar**

**2016 SCSEP Transition and More Transition**

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*Transcript by*

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GARY GONZALEZ: While you're doing that, I want to turn things over to Michi McNeace. Michi, take it away.

MICHI MCNEACE: Thank you, Gary. And I want to say welcome, everyone, and thank you for joining us today for our second SCSEP transition webinar titled transition and more transition. Our presenters today will be Judith Gilbert, Bennett Pudlin, Terry Cram, and a little bit from me as well.

So on that I want you all to understand or know basically is that our objective today is to basically cover – to go over transition planning and how that continues. And then we want to talk about meeting the transition and transfer deadline, and I think this is the most important one is actually us trying to answer those burning questions that you guys had that you sent in either through the transition mailbox or through the questions and answers section from our last transition webinar.

And then understanding – we want to get more into details about understanding IDL transition. Then of course throughout the PowerPoint presentation or throughout the webinar in itself, we will be opening it up for questions and answers to that we hope that we can engage you and keep you guys in – I'm not sure where I was going there but to keep you engaged, basically, and then talk about next steps.

So on that note, I would like to go ahead and introduce our first presenter, which is Judith Gilbert.

JUDITH GILBERT: Thanks so much, Michi. Our slide says, transition keeping it going. This is transition planning continued. So what we're going to try to do today is talking about meeting the transition milestones, look at where we are today and where you should be, and where are you or we going next on this.

So if you'll look at your next slide, these next two look very familiar to you. These are the slides that we presented a week ago, just the big-picture overview, October, November, December, January and then the next one is February but let's stay on this one for a moment. By now, we would assume that you're finalizing your transfer list to meet that November 15th deadline and that the letters to participants and the host agency are either in the process or maybe have actually gone out.

And also, anyone looking to do some swapping, remember that that period ends on November 22nd, but that's basically mostly what's in October and November. And then you can see what is coming up in December and January, and we're going to be covering a number of those things today. And then the February one is obviously the official transfer date is February 1st, and the 90 days that the participant has for the IDLs and the right of first refusal goes to May 2nd.

So is your transition planning on schedule? Poll.

MR. GONZALEZ: So this is our first poll. Exactly. And the question reads, have you started communicating with your participants? And the options you have to choose from are not yet, still working out details, need further guidance, in process, or yes, all done. And I may have brought up the wrong one. So let's see if we can't bring up the right one, and we're looking for, is your transition planning on schedule? So while we figure that out, you can actually type into the chat what your answer is.

And while you're typing in, I just want to remind you that we are recording. We're going to post that recording to WorkforceGPS in approximately two business days.

And we're seeing that people are typing in, sure are. Yes. On schedule. Working on it. Yes. On schedule. So it looks like most people are working on it or it is on schedule.

MS. GILBERT: Yes. Working on it. Working on it.

MS. MCNEACE: It's a good sign, Judith.

MS. GILBERT: It is indeed. We'll get a little more specific, and we'll give you a little bit more time to type in.

MS. MCNEACE: I like that. They're working hard on it. That's good.

MS. GILBERT: OK. The next slide is the graphic that we did last time, and this is just to help you – help me visually see things where – it helps you see sort of where things overlap. I think that's the most helpful thing.

So where are we today? So you would needing to be starting the transition process. As we did in the first webinar, we all know that you implemented your transition plan and you're beginning to inform your participants, reaching out to the recipient grantees that you'll be working closely with in the next few months, providing relevant information and documents, not participant files but sharing IDL policies. And we did send out to you as an attachment to the last webinar what everybody's IDL policies are.

And we can resend it again at the end of this call, if you don't have that handy, because we have some questions about that further on. We'll talk about also participant files and program files as it's going on, but basically you can read what it says here about the process of starting the planning, sending out detailed letters, and also reaching out to host agencies.

Most important thing – we'll talk about this some more, but when you think about the letters, it is really – the main point of the letters to the participants – well, the details are important about what they need to do next and who's the new grantee, etc. It really is that assuring that or reassuring them that they are staying in the program, and the fact that you may be leaving them is – doesn't mean that they're being left behind.

So now, a little bit more detailed poll question. Gary?

MR. GONZALEZ: Sure. So the question reads, have you started communicating with your participants? And the options are not yet, still working out details, need further guidance, in process, or yes, all done. And to participate just mouse over and left click the radio option to the left of the selection beneath the question, and we're able to see in real time the results as they're coming in.

So it looks like splitting the pack or it's actually just pulled ahead, in process is leading followed by not yet followed by still working out details and then one person said, yes, all done.

MS. GILBERT: Oh, wow.

MS. MCNEACE: Love it.

MS. GILBERT: No further guidance needed so far. That's good news to us.

MS. MCNEACE: Yes.

MR. GONZALEZ: All right. Thanks for participating. I think we'll move on to –

MS. GILBERT: The next poll.

MR. GONZALEZ: – poll two. Exactly. And it reads, have you started communicating with your host agencies? And the options for your responses are in process, not yet, still working out details, need further guidance, or yes, all done. And leading the pack is not yet followed by in process with one person saying still working out details and another saying, yes, all done.

MS. GILBERT: Still no further guidance.

MR. GONZALEZ: I do want to remind folks that you can use the chat window at the bottom left-hand of your screen to type in any questions or comments throughout today's webinar. We do want to hear what you're saying. We're going to take your questions, place them in a queue, and address those questions during our Q&A period.

So looks like the polling has settled down a bit. I'm going to toss it back over to Judith. Judith?

MS. GILBERT: Yes. We're actually going to open this up now and hear from you as to – because we've got a variety of responses here, and it would be helpful to us but also I think helpful for you with each other to hear where other people are, and also if you're not quite where you want to be, what kind of challenges are you experiencing in that? I think that the easiest way to go through this, because while we can see and you can see what the poll results are, you don't know who's saying it.

So in order to get a little more specific, why don't we just actually go through a roll call and I've got the list in front of me and you can just tell us if you're not quite where you want to be, what challenges do you have or what help do you need, but also, especially whoever said I'm done, yeah. We'd love to hear that or either you're in process or wherever – whatever your answer is.

So I know people are used to doing things in alphabetical order. So we'll stay there. How about AARP? Do you need them to unmute their phone line?

MR. GONZALEZ: So if you're listening to today's audio through your computer speakers and you want to verbalize something, you need to dial into the teleconference line, which means you now need to mute your computer speakers and you'll notice I've placed the teleconference information at the top left-hand of your screen. If you'd rather type in your response, you can do so in the chat window. And if you'd like to – if you are dialed in and you want to chime in, you'll need to press \*6 on your phone's keypad to unmute your line, and then please introduce yourself and respond to Judith's query.

MR. : Yes. This is Corey Hastings from AARP. We have sent out all of the notification letters to our outgoing participants, and at this point probably I would say 80 to 90 percent of them have actually been received. And we're in the process of working on a release of letters to participants incoming to us following notification by their current sponsor. Thank you.

MS. GILBERT: I see people typing in, which is perfectly fine. We'd just like to at some point, either typed in or audio, hear from everybody one way or another. So why don't we give you all just a minute to type in your answers, if that's what you want to do. Or if you want to do as Corey did, talk to us.

MR. GONZALEZ: \*6 will unmute your line.

MS. GILBERT: Perfect.

MR. GONZALEZ: And it looks like – hopefully I'm pronouncing it right – Sistil (sp) Carter SSAI is in process. Nelson – (inaudible) – ANPM – (inaudible). Got it. In process.

MS. MCNEACE: Easter Seals' in process.

MR. GONZALEZ: Deborah Edmonds, Good Will Industries International in process. No problems. Karen Brown, SCR, letters ready and will go out early next week. Andrea Bridgewater (sp), all participant and host agency have been mailed to the new grantee. And Patricia Wilkins is saying National Able Network is in process and notifying participants and host agencies. I think I may have heard somebody unmute their line. So if you do want to chime in, please feel free to \*6, introduce yourself, and chime in over the phone.

Q: This is Pat Elmer from Associates for Training and Development. We're also on target. I did have a question, though, about the letters. We have –

MR. GONZALEZ: Actually, can I ask you to mute your computer speakers first?

Q: Sure. Will you mute them? We had some training meetings scheduled already for the end of the month, and I was wondering if we could tell our participants in person at those training meetings rather than get the letters out by the 22nd. I think we might be maybe the week after the 22nd is I think when we've got the meeting scheduled. So if that would – would that be an option for us?

MS. GILBERT: I think so. I mean, the dates that – there's no firm date for the – when the letters have to go out. We – it's kind of a rolling date. Some people sent them out in October even, but it was November. And this was kind of by the end of December you should have gotten the meeting – the letters out and had the meetings or have them scheduled.

Q: Thank you. I kind of thought that the dates might be flexible, and I thought if – because of what's been happening in politics lately, I'd rather not be responsible for sending out someone this transition letter if we have the option of telling them face to face that everything's going to be OK.

MS. GILBERT: So you're not planning to send them a letter at all?

Q: Yes. We would give it to them at the meeting.

MS. GILBERT: So how do you – how do they know to come to the meeting?

Q: Oh, it's already scheduled.

MR. PUDLIN: Judith, this is Bennett. I understand the logistical challenge, but I do think there's a value in having everyone get in writing the same reassuring information that –

MS. GILBERT: At the same time.

MR. PUDLIN: Well, yeah. And I think the timing is up to you. If you're going to – there's nothing wrong with announcing it at your regularly scheduled meeting, but I don't think it's a substitute at some point for a letter.

Q: No. I agree.

MR. PUDLIN: There's too much danger of misunderstanding or rumors getting to someone who missed the meeting or whatever.

Q: Right. I agree on the importance of the letters. So I think what I heard is that – just that the date of the letters going out is a bit flexible, but I – so I think we have an option to do it either way. Thank you.

MS. GILBERT: We can certainly discuss offline because that seems like it's a little bit different than what we're expecting everyone else to do, but you – but thank you. You – we see that a couple of people are still typing, and so this is extremely helpful.

I just want to know is – whoever checked that they're all done with both the participant letters and the contacts with the host agency, have you identified yourself so we can give you a high five? Or did you misspeak? Great. We have all the information we need. Anything else that people want to type in now? Otherwise, I am going to turn it over to –

MS. MCNEACE: Andrea Bridgewater.

MS. GILBERT: I'm going to turn it over to Terry Cram. Oh, I see someone has just typed in that they're here and that they had trouble getting in. So welcome, Sue. We're glad to see you here – (inaudible) – there.

MR. GONZALEZ: Right. And Andrea Bridgewater says she notified all host agencies and participants.

MS. GILBERT: Perfect. Love it. Thank you so much. OK. At this point next slide and over to Terry Cram.

TERRY CRAM: Hi, everybody. So I'm going to report on the lists. As of this morning we've received lists from seven grantees, six nationals and one state, but we still need to hear from nine, seven nationals and two states. The deadline is November 15th, which is next week, but we are hoping that we don't get them all on the same day. So if you can possibly get them to us sooner, that would be wonderful, and if you have any questions, please contact us as soon as possible.

Based on what we've seen so far, we do have a few notes that may make life easier for the rest of you. Please do not send your lists until all rows are complete. We cannot process partial lists. So we'll just have to return them if they're not complete. And please be sure to check the tabs for all categories, 1, 2a, and 2b to see if you are the donor on any of the rows on any of the tabs. You must fill in the donor grantee annotation column for every single row, even if the answer is donor and recipient agree for all rows.

You can use the paste function, or you can use the drag function to fill in when you have multiple rows. So it shouldn't be too painful. In future versions of the lists we will use the Excel protection feature to protect the cells except for the ones that you're supposed to provide responses in, which are the ones where the column header is highlighted in yellow. In the meantime, please don't change any data in any of the other columns.

If you need to call our attention to some pieces of incorrect data, please do that in the additional comments column because otherwise we might miss a change and, dependent on what that is, that could result in a participant not being handled properly. And finally, in this section please do not – please only the donor grantees should send the lists. The recipient grantees, if they have anything they want to tell us, they need to contact the donor. We can't accept the feedback from the recipient. So the recipient works with the donor, and the donor contacts us.

For future we will be combining all the information that you send us and create a master list, and then we'll update that list to include the county changes that are due to any swaps that are approved and the enrollment as of late November. So we'll be sending you a participant transfers version two list on December 1st, and that list will include a couple enhancements. It will have a few new columns indicating the name of the host agency to which each participant is currently signed and the dates of the last IEP, last recertification, and last physical or waiver.

It will also include a few extra rows where the state grantee is the donor. We will be needing you to confirm that list, make any necessary changes, and return it by December 15th. In the meantime, we'll be sending you an updated version of the version one list, and that one is for informational purposes only. We'll be sending that before Thanksgiving, and we're going to be calling it version 1A.

That will not include the responses that we receive from you and it will not reflect the county changes causes by the swaps but it will contain the new columns and the extra rows for the state grantees. As I mentioned, it is for informational purpose only. We do not need you to provide feedback on it. It is just to – so that you have the information on the host agencies. It will also include the latest enrollment information so it will reflect any enrollments or exits since 10/18 until today.

We'll also be creating one other list that will be for informational purposes that has information about every county in the country and which grantees, if any, serve in each county. And then one last thing. When version one was sent, the e-mail mentioned that the category three tab was for information purposes only. At least one grantee has entered a list of participants to transfer on that tab. We want to make sure that you know that we will not be doing anything with that information.

After all records in category 1, 2a, and 2b have been dealt with, we hope to be able to accept the information about category three transfers, and if so, that will likely be in January. If we aren't able to do so, you'll be able to transfer them for the usual discretionary transfer procedure. But for now, please don't give us information on that because we're just not going to be able to deal with it.

And now, Bennett was going to talk about category three and over-enrollment.

BENNETT PUDLIN: Thank you. Thank you, Terry. And good afternoon, everyone. So several grantees have asked us about what we mean by over-enrollment with regard to category three and how that relates to over-enrollment with regard to grant funding. And we want to plead guilty to a lack of language discipline again. We're using the same term in two different ways. One is where there is a large variance from ED and the other is when the grantee is spending more money overall than the grant can support. These two, obviously, intersect, but they're different. And for category three, I'll just, again, repeat what Terry said. This is informational only.

What we're doing in category three is showing you your enrollment in each county compared to your authorized PY '16 positions and flagging where the variance is positive and where it's substantial. And by positive we mean the enrollments exceed the authorized positions. By substantial we mean a two-part test that the number of enrollments greater than slots is at least five and the percentage is at least 33 percent. Now, that's a made-up standard.

As we said in the instructions, there's no official DOL standard with regard for the permissible degree of variance. You should be familiar with this concept from SCSEP ED because the summary table – actually, all the detail tables and the summary show you the enrollments compared to authorized and give you the variance labeled V.

What we're just trying to do is to give you the information that you can use to decide if you wish to use this time to try to make discretionary transfers with other grantees that can serve in those counties, but it's nothing that we can deal with right now when we're in the midst of trying to nail down all the mandatory transfers. So again, it's informational, and we explain that you can set your own standard.

You don't have to use the one we gave you. We're hopeful that we will be able to use the batch process that's going to do all the mandatory transfers on February 1st to accommodate any discretionary transfers you want, but we'll keep you posted on how we're going. If you all can keep to the time frames that have been laid out, I think there's a good chance we'll have the ability to do that.

With regard to over-enrollment for grant purposes, we've had several grantees, including state grantees, questioning whether being over-enrolled for ED purposes within a single county is going to impact their grant somehow. And the basic answer is no. Over-enrollment in a county can happen for several reasons, all of which have occurred here. In some instances the PY '16 ED based on the census has reduced the number of slots that you had in a given county during PY '15.

The PY '16 competition has definitely reduced the size of awards in some counties for some grantees, and then there are other cases where grantees, for whatever reason, were not mindful of ED and wound up enrolling more participants than ED says they should. Again, we see all three of these at work. The short answer is that being over-enrolled in one county does not mean you're going to overspend your grant. Overspending in one county can be offset by underspending in other counties. If you are in danger of overspending, then there's a whole array of things that grantees have always done that would apply now as well. The obvious places to start are to freeze enrollments.

Secondly, to look to increase exits for unsubsidized employment, and last, if all else fails, to reduce hours judiciously and hear the advices to act sooner rather than later. A small reduction early in the year avoids a very large reduction later in the year. So I think with careful management in ways that you're all expert at the competition and ED changes should not pose any significant challenges for grant management.

So with that I do want to speak just briefly about swaps, and I think we have another poll coming up, Gary.

MR. GONZALEZ: You got it, Bennett. So we're going to put the poll up right now, and it reads, are you still contemplating swaps? And the selections are yes, we've done ours, still contemplating, I have no idea what this is, and definitive no. And it looks like yes is leading followed by definitive no and still contemplating and then we've done ours bringing up the rear. It looks like an even split between yes and definitive no.

MR. PUDLIN: OK. Give them another second.

MR. GONZALEZ: Definitive no has moved ahead, and now yes has moved ahead.

MR. PUDLIN: All right. I think we've got – the good news is that there's no one who doesn't know what we're talking about. That's great. And only three are still contemplating, which is also great. If we can – yeah. If we can move on.

No change here from a slide you saw in the first transition call. What's happened is we got past the all grantee call on November 3rd, which was really for the state grantees, and they've gotten into the act. And we have already processed one – and DOL has not yet acted but is about to. We processed one request that involved a state grantee We have approved two requests and have at least one or two more in the works. So we are eager to work with you. We'll help iron out any difficulties you encounter. The goal is to make it easier for you to run your programs and DOL will be as flexible as possible but we do need your cooperation to get these in as soon as you possibly can.

Obviously, you need to know that because you don't know which grantees you've got to send letters to, which grantee – I'm sorry – which participants you're going to send letter to which are going to have to go to your meetings and which recipient you're going to have to get copies to.

And we are desperate to know because we can't nail down the transfer list until all the swaps are done. So we appreciate those of you who got in early and encourage you – the rest of you to meet or beat the deadline. We're going to be very hard-pressed to grant any extensions beyond the 22nd.

So with that I think it is back to Judith.

MS. GILBERT: Indeed it is. Thank you. Next slide, we're going to actually go to transition activities and get a little bit more specific about things that we've talked about in general. This slide is also very familiar, but I think it's one of those that we always need to keep in the forefront of every step in the planning stage, doing no harm to the participant, the right of first refusal, and the right to fair duration. So we'll go – get a little more specific about each one of these.

Doing no harm, no participant being adversely affected is terribly important, and it's obviously not a time to feel that you have to exit people who are being difficult or transition them or anything, but your communication to the participant should be really deliberate in a way that minimizes any misunderstanding or raises alarms, causes confusion, or that they feel an immediate need to contact us at DOL because that's not helpful to them or us. Assignments with transfer to the host agency we'll talk a little bit about that in terms of pay of rate and hours in the next one.

So then there's the right of first refusal. They have a right to remain with the same host agency and community service assignment for 90 days after the transfer. That's until May 2nd, and wages and training hours should remain the same, although hours may be reduced if they're reduced uniformly to everyone in the recipient grantee. These are rare circumstances, but occasionally it can happen.

So the guarantee may be not quite as clearly stated. The one thing that this does not do is it does not allow any participant to say, yes, I want to stay with the donor grantee. The right of first refusal does not include that right.

And then the right to fair duration, the recipient is going to apply the most favorable durational limit to either – which is either the donor grantee or the recipient grantee. And the ideal extensions grated prior to February 1st are still in effect, and they must be honored by the recipient grantee for the full year of the extension regardless of what the recipient grantee's policy is. And the recipient grantee is responsible for continuing or implementing the ideal transitional services, assessments, IEPs, supportive services, etc.

During the Q&A at the end of this session, if anybody has any best practices about other transitional services that were provided that we can share with others, we'd really appreciate hearing you about that.

So I think we have a poll. I'm sorry. This is an important slide. No harm, what about participant staff? The same rule applies to participant staff because they are participants. So we understand that there's a complexity about this that not all grantees agencies use participant staff and in the same kind of way. The participant staff should be transferred, but here's our advice to the recipient grantee.

And the recipient grantee must allow the participant staff to continue in that capacity at the same or their prior wage. If they don't do participant staff, they must find the transferred participant the most comparable community service assignment where they pay and the hours would hopefully be the same for the 90 days. We do have a recommendation, something for you to think about. If the – if you do not use participant staff when you're a recipient grantee and you're getting someone transferred to you who has been serving as participant staff, you might consider keeping them doing that kind of work for the 90 days because I think they could be especially helpful to you because they've been doing that kind of work in the previous one.

It's not an absolute requirement and you certainly don't have to continue that beyond the 90 days, if you don't want to, but utilizing their expertise and experience, even if you're not used to doing that, may just be a helpful kind of thing to do.

So with this I want to turn it over to Michi.

MS. MCNEACE: Before I get started, I believe there's a poll.

MR. GONZALEZ: There is, and it reads, what is IDL? And the options you have to choose from are interactive data language, individual drinking limit, International Date Line, or individual duration limit. So what is IDL?

MS. MCNEACE: 100 percent.

MS. GILBERT: Wow.

MS. MCNEACE: Yeah. Wow. OK. Thank you for that. We covered the slide that you see now, managing individual duration limit, IDL policies and transfers. We covered that somewhat in our last webinar, but after the webinar and during the webinar we received additional questions about IDL processes, policies, and we thought we – it would be best that we bring this back today.

So just to reinforce the IDL dates that we have listed on the PowerPoint, that durational limit exits that are before February 1, the donor grantee – you use the donor grantee's IDL policy. Only the donor issues termination notices for exits before February 1.

Now, DL exits between the period of February 1 and February 28, that's that 30-day period – it's 28, give or take a couple days, but the donor and recipient grantee will work together on transitioning, planning, and jointly issuing the termination notice.

We say that because it's within that 30-day period, and if you had a participant that was related to exit due to durational limit prior to February 1 and you've got to do a 30-day letter, you need to work with – the donor and the recipient need to work together because the donor is going – they – if they do a joint letter, how we saw this is if a participant was exiting and they got their 30-day and it's during – it's after 21, if 2/21 is their exit date, having the donor and the recipient work together doing a joint letter because at the point of the participant transferring within those 30 days, the donor is going to be handing off that participant to the recipient.

And the recipient is going to gain the responsibility of ensuring that that participant is exited timely at the durational limit date. And we're going to open it up for questions and answers later.

And so DL exits between 2/1 and 5/2, May 2nd, of course that's a 90-day. You use the IDL policy more beneficial to the participant. So donor and recipient grantees will still work together to start the transition planning. And then DL exits after the 90-day period, which is May 2nd, you would use the recipient grantee IDL policy but keeping in mind that you would still maintain what is the most beneficial to the participant.

MS. GILBERT: And you would also honor any extension, even if it goes beyond that, if it has been granted by the donor grantee prior to the transfer.

MS. MCNEACE: Exactly. That's a great segue into our next slide, IDL extensions.

MS. GILBERT: It's when we work together, we think alike, don't we?

MS. MCNEACE: We do. So as Judith said, extensions granted by the donor grantee must be honored by the recipient grantee for the remainder of the durational period, which is the one year from the date of the last extension. And so recipient grantees must apply the IDL policy of the donor until May 2nd, if it is more favorable for the participant. Next slide.

So the policies for each grantee, we ask that you review the IDL master list that you received to confirm that your current IDL policy is indeed current. And then during that time assess the donor, you the donor and you the recipients – assess the policies to determine which – or determine which participant to ensure each participant has fair duration. We have the question of, how would we know what the recipient policy is and the recipient asked, how do we know what the donor policy is? The master list will tell you; correct, Judith?

MS. GILBERT: Yes. Absolutely. And this is the one that was attached to the previous webinar, and also we will – we'll send it out again if people say they need it. You can let them know that.

MS. MCNEACE: OK. And also keep in mind – always remember use the most favorable to the participant. And we have the dates – OK. So we had a little mistake on the slide about the 30 days. So instead of the February 28th, it should be February 1st to March 2nd or March 3rd. So just a slight correction. And I want you to know that if – when reviewing your master list, if you find that your current policy is not indeed current, please contact your FPO immediately and let them know and submit the most current policy to them.

And so IDL requirements, this is nothing new for our – for all our grantees. The requirements for SCSEP grantees is to inform all SCSEP participants at enrollment about the IDL, the 48 months and the grantee and what you have in your policy. And then of course informal all SCSEP participants if and when there is a change to your policy. You've got to give them notice.

You can't change your policy in mid-stroke and then just assume that they're going to be effective and the participant does not know about it. Inform your participants about their IDL exit date 12 months out. Great practice to re-inform them again six months out and then of course three months out prior to their durational limit date.

And then develop the individual durational limit transition plan for the final 12 months. So we talk about that. We can get into that later in detail, but we're talking about the transitional services and the transitional IEP that should be developed for all participants getting prepared to exit for IDL.

MS. GILBERT: Regardless of whether it has anything to do with this – with the competition changes.

MS. MCNEACE: Exactly. And so for those participants who are being transferred to the recipient and is slated to be exited, the recipient grantee's IDL policy, if it's not more favorable, the donor must ensure that the transitional IEPs and everything, all the information, IEPs, case notes, things of that nature are transferred to the recipient grantee. So you're going to give your participant 30-day notice of termination as usual and then have – and then of course making sure that every grantee has an IDL policy that is consistent and equitable.

So we also had a question that, what if the participant is in the middle of their 12-month prior to being transferred to the recipient? As we noted in that – the transitional planning, the IEPs, case notes, everything that you've done for that participant must be transferred to the recipient grantee. And that's where you guys would have this dialogue and talk about – at least inform the recipient grantee as to the stages as to where that participant is during their transitional period.

So with that we're going to go ahead because it's a lot of information and we got questions coming in. We're going to go ahead and open it up for questions and answers.

MS. GILBERT: I see a question here that – for – "A recipient grantee is coming on board and hasn't requested a waiver. Does the recipient need to grant the waiver based on the donor's policy or the recipient policy?" If according to – if – whatever's most favorable to the participant, and if the recipient could be granting a waiver because the person qualifies for it, then they definitely ought to be doing it. Most of you have policies now that are – that don't allow any extensions beyond the four years. There's only a few of you, as you can see from the master list, that have policies that are like that. But if you come across a situation like that as the – you are to be in touch with each other and raising the question with the other person, with the other grantee.

MS. : Judith, this is Pat Wilkins, and that's actually my question. So I'm just trying to be clear on this. We are inheriting a waiver policy, and Able currently does not have a waiver policy. So if there's a participant that, say, in March or even April after we have transitioned over who requests a waiver, a 12-month waiver at the recipient, we have to grant that waiver? Or what's the timeline when we would adapt to our internal policy? After the 90 days or what's the guideline for that?

MS. GILBERT: Bennett, if you had a comment.

MR. PUDLIN: Yeah. The rule, Pat, is that you have to apply the more liberal policy. So even though you would not ordinarily grant an extension, because the recipient is coming from a donor grantee that does, you would follow the donor's policy for the first 90 days, which is through May 2nd. After May 2nd you would apply your own policy.

MS. : OK.

MR. PUDLIN: If you grant an extension under the donor's policy between February 1st and May 2nd, it's good for the full 12 months.

MS. GILBERT: Correct.

MS. : OK. Thank you.

MS. MCNEACE: OK. We have another question, "Are you posting all the attachments for each webinar on the CoP as well as GPS for ease of access?" And the answer is of course. Yes. We are.

We have another question. It's like, "Please be clear. If recipient is not currently extending, we don't need to create a policy for someone who has not already requested, only for those who have already been granted?" Give us a minute. Let us read through this again.

MR. PUDLIN: I think this is a variation on the question Pat just asked. So there are two scenarios here. One is that an extension is granted by the donor prior to February 1st, as late as January 31st. It's good for 12 months, and the recipient has to honor it, even though the recipient does not grant extensions itself.

The second scenario is the one Pat posited where the donor allows extensions. The recipient doesn't. The transfer occurs February 1st. Durational limit date is February 2nd. The recipient applies the donor's policy and grants the extension for 12 months, even though it doesn't offer extensions to anyone else.

MS. MCNEACE: So were we able to answer your question, Mr. Sites (sp)?

MS. GILBERT: You're typing. Wonderful. There is another point to make here, and that is that all grantees must have their own policies and their procedures for doing that. For new grantees, those four of you who are new, you wouldn't have a policy now, but you do have to create one at some point.

So in the interim until that May 2nd date is reached, we believe that the most advantageous to the participant would be if you had a policy that did allow extensions for any one of the seven waiver factors. It would just be a temporary one that you would be – that would be in effect for you now, and then you – in the course of time, you will have to develop policies on a whole host of things – this is for the new grantees – that – about grievance policies and a variety of others.

So you will get a temporary IDL policy for the purpose of the transfers that is – allows someone to have an extension, if they meet any one of the waiver factors. It's the most liberal of the policies, even though most of you no longer have those. It seems the only fair way to figure out what a policy should be because all of the new grantees are, in fact, getting participants as a result of the competition. And I think we've answered the question. OK.

MS. MCNEACE: OK.

MS. GILBERT: Any other questions at this point about this area? This is always a difficult one because it's so situation specific.

MS. MCNEACE: Exactly.

MS. GILBERT: So let's move on and talking about communications and what do we tell participants. We've had some requests for sample letters and things, and we sort of looked at that.

But we think that the thing that is most helpful is that we just articulate what ought to be in the letter, and most of you are well in the process of doing them anyway. The most important thing that the – and I said this earlier. I'll say it again – is the tone that you set in this letter. It really does need to be very warm and open and supportive and not bureaucratic. It's the kind of letter that – I guess my standard test would be, if you gave it to your grandmother to read, would she be upset, or would she feel reassured?

And it's the reassurance part. And so they really should contain a basic information, a sentence about why this is happening, but focuses mostly about the statement ensuring that they will remain in the program with the following guarantees and introducing them to the new grantee and the time and the date and location, if that's possible, about the meeting and any information that you require that they bring and who to contact if the participant cannot make the meeting or any assistance is needed.

Let's talk a little bit about transition meetings. They obviously best conducted in person. One of the – and that the donor and recipient grantee should jointly conduct them. And we've mentioned here inviting the state SCSEP grantees to the meetings also.

On the call that we had with the states last week, this issue came up, and we encouraged them to reach out to you and attend meetings wherever that was possible. They clearly would not be able to attend them all, nor would that be necessary, but it just really is an opportunity, especially if the grantee is new to the state, to start making contact with the state and working together with them. So an ability to network with them.

The agenda, this is just some suggestions, and we don't need to spend any time going over this. But you can read it, for those of you who have asked for these kind of helpful hints. And then there's a separate slide, similar thing. Just some suggestions on what the agenda might be like for the host agency transition meeting where you're going to be meeting with them for the first time.

This is not with the participant but hopefully in advance of that. Obviously, the biggest issue – and you all have raised this before – is if there are changes in the payroll processes, to get that clear so that you can inform the participants appropriately so that no one loses out on a paycheck because the bank doesn't have – or you don't have everything you need and also giving people who the – who is the appropriate contact person.

Any questions about that or comments?

MR. PUDLIN: Judith, this is Bennett. I just wanted to make one comment about the host agency letters and the host agency meetings. The letters rightly focus on the fact that the participant has the right to remain with the host agency for 90 days, but some of the models that we've seen are written in such a way that they almost give the impression that it's 90 days and out, and I've seen that's not really what we mean to convey in most instances, that the recipient wants to use that period to assess whether to continue working with the host agency but in many instances it would be pleased to do so.

And so in the same way that the participant letter starts by assuring the participant that nothing is going to affect your eligibility here, perhaps the host agency letter and the meeting should make it clear that, if the host agency wants to transition over to the recipient, this is a chance to work that out and perhaps everything will continue as it was.

MS. GILBERT: And the participant certainly stays in the program beyond that 90 days under just the ordinary rules.

MR. PUDLIN: For sure. The participant is going to stay but may go to a new host agency, depending on circumstances, and the host agency may or may not continue working with the new grantee. But I guess I'm suggesting you wouldn't want to write the letter in such a way that gives the impression that that can't happen at 90 days and then the relationship with the host agency is severed.

MS. GILBERT: I see a question for Bennett, Terry. "Will there be a new transfer participant list for participants that have since enrolled between when the first list was generated and the enrollment freeze?"

MS. CRAM: Yes. That's actually – the list that we plan to send before Thanksgiving that's for informational purposes only, it will include everybody who has enrolled up until today, and then the list that we send on December 1st will include everybody who's enrolled up until November 28th. So that – when we send the list, it's always going to include updates as to who's been enrolled and who – in case anybody got enrolled for the freeze but it wasn't entered into Spark until after the freeze. So you'll get updates every time we send a list.

MR. PUDLIN: As well as anyone who's been exited. It will be – it will show current enrollment through the date of those two lists.

MS. CRAM: But we won't – if a person was active in version one and is no longer active, we won't delete that record. We'll just indicate that that record is – that person is now exited in Spark.

MS. GILBERT: OK. Thank you. Let's move on.

MS. MCNEACE: Well, before we move on, I think Bennett would like to just clarify one thing about grantees' own IDL policies. Bennett?

MS. GILBERT: I just mentioned that.

MR. PUDLIN: I think Judith got it.

MS. MCNEACE: OK. Great. OK.

MS. GILBERT: So, Bennett, it is now over to you for the next slide.

MR. PUDLIN: OK. Thank you. So no change here. Just we did have a bunch of questions last time on recertifications. We've – this slide repeats where we landed. Then – but just a quick refresher. For anyone whose recertification is due prior to February 1, the donor is solely responsible. If the recertification falls due at any time after February 1, the recipient will do it.

And the third bullet makes it clear that if the recertification was done within the last 12 months, there is no reason for the recipient to redo it. The rules say that a transferred participant retains the same status with the recipient as with the donor. The prior recert is good. Obviously, if there's a change in circumstance, you have to redo it, but barring that, you should leave it alone until it's time.

And the time, again, standard DOL policy, in exception to the 12-month rule, especially for people newly enrolled with you, is that if you have a common recert period where many of you we know do recert everyone in the spring after the new poverty limit's been published – you can recert people sooner than 12 months one time to get them on the schedule with everybody else. So that doesn't change your practice in any way.

Next slide, please. So we have a couple of slides here on the question of exchanging documents for participants who are being transferred, and we went over this at a high level last time and we wanted to drill down a little bit. The basic rules are that the donor has to prepare files to be transferred to the recipient. We don't want the originals. The originals stay with the donor. Copies are perfectly acceptable. Electronic copies are acceptable as long as the recipient has a way of getting them and printing them out or storing with them, working with them.

Want to always be careful to safeguard personally-identifiable information. Obviously, if you're doing electronic records, you've got to be extra careful of that. If there's a breach, you follow the normal procedures and notify DOL pursuant to the policy. And as we'll talk about in a minute, there are special rules for handling medical records that have to be followed, especially in the case of a transfer where you don't know for sure who's going to be opening the files and what's going to be happening to them. You got to make special arrangements for that.

So we did not get into great detail or really any detail last time about the content of the records to be provided to the recipient. So what we have in the next few slides are the items that DOL believes should be provided to the recipient. So starting with the three – eligibility determinations, the last three basically that could well include the original, important to say here that the average duration in program nationwide is around 18 months.

It's somewhat shorter than that for most national grantees, a lot shorter for some. So the number of documents you're likely to have here is probably the maximum. In many cases there will be fewer. The initial assessment and the two most recent assessments, same for the IEPs; the original and two most recent, record of any additional paid training outside of that provided through the community service assignment, record of any disciplinary actions, all case notes, any documents related to special needs of the participant or that might be important for informing how services are provided. If the participant's assignment requires or involves driving, than any current auto insurance and driver's license on file so that you don't make the participant have to provide that again.

If the person is within the period for exit due to durational limit, any notices you've provided, as Michi just explained, the 12-month, 6-month, etc. If you've begun the transition process for that participant, the assessment and plan, if developed. For everyone, the community service assignment description, including current wages and hours, the release form that I'm sure you all get either at enrollment or the time of exit to give you authority to collect the follow-up information from the employer, documentation of the last offer, the physical exam which presumably will have the waiver if the participant declined it.

If the participant's on approved break, provide information on start date, reason, and expected return date, and just a reminder that you have an indicator on the transfer list that will tell you who's on an approved break. And then again, this notion of the medical records, any other record that relates to disability. Our rules are set forth in Topic 56 of the Participant Form Guide in the current version of the Data Collection Handbook. Those were developed by DOL's Civil Rights Center to protect us all and should be followed, and that means that these records cannot be combined with normal case records.

They have to be segregated. They have to be especially secure, and they can only be handled by those with a need to know and work with those records. So the same way you would handle them within your office, you've got to make similar arrangements when you're transferring them, and I would suggest strongly that you contact the recipient in advance and agree on what the method of transmission is so you can be sure that those particular files go only to the right person.

Before I move on to the host agency, I just want to go back one second. We said we do not need the originals to be transferred, and that is true in the normal case. Just a caveat there, though. If a sub-grantee is going out of business, it is critical – for any reason, the grantee's leaving the state or changing subs or whatever the reason may be, it is critical that the grantee retain control of the files. The grantee is the legally liable entity responsible for the documentation and record retention. So you must make arrangements, if you're closing an office, for the safeguarding of those files.

Let me just briefly talk about the documents regarding the host agencies. I don't think we got into those last time. Again, DOL is – believes that the current host agency agreement and information about date of last renewal should be transferred.

Last documentation of the 501(c)(3) tax exempt status should be provided. If you have it, the holiday schedule observed by the host agency, information on the supervisors who will be working with our participants and approving timesheets, the timesheets used, in-kind match information, any information about a satellite location if the participant is currently off-site, the training description and last monitoring and safety visit reports that you have. Providing all of that to the recipient will certainly make it much easier for them to make the transition with the host agency.

And with that I think it goes back to Judith.

MS. GILBERT: Yes. Thanks. We have a poll question, actually, right now.

MR. GONZALEZ: Right. And it reads, did we answer your questions about file transfer? And the options are no, still have more questions, yes, you did, or completely.

MS. GILBERT: Started to ask questions already coming in. Keep talking he says. Looking at the question, "What is the logic to have key eligibility certifications that are old? Why not just the most recent one?" That's – is really a way to help the new recipient grantee have a further understanding of the participants that they're getting.

And, "Does the donor grantee really need to keep the host agency file?"

MR. PUDLIN: Donor – the record retention would apply to all records. So –

MS. GILBERT: I believe that's correct.

MR. PUDLIN: I don't know why we would distinguish. Just back to Fred's question for a second, I think there are instances where in assessing people's eligibility and looking at changes in income, having the prior eligibility determinations are very useful. We're not looking for massive documentation. I think probably the summary sheet would suffice, but I think that that would be something that would be useful for them to –

MS. GILBERT: This is actually the time in which we wanted to get feedback from you if there was anything that seemed particularly problematic in this list that we've given you. And this is what we've come up with. We actually were able to use some sample things from other – others have sent us but looking at what the rules and regulations all say. So you are free at this point and encouraged to let us know what you see about the list that we've given you and any feedback for us about that because we're open to listening.

MS. MCNEACE: Yeah. So we can – (inaudible).

MR. PUDLIN: Michi, there's a question about picture IDs and Social Security card. I know that participants are being asked to bring to the meeting various forms of documentation, identification. If you have those on file, I suspect that would help ease the burden for the transition meeting. Again, though, a question that you're dealing with very sensitive information and you're going to have to take great steps to ensure the data don't go astray.

MS. GILBERT: And then another, "Is there any easy things that people can do in order to protect files as they're being sent like a password protect on them or something?"

MR. PUDLIN: Yeah. At the very least you would password protect them. It's a system we all know, and you send the password by a separate communication, if you're doing electronically. I would think probably in most instances not be doing electronic records, and so you have to work out with the recipient I think a really secure method of delivering the hard copies, if they're containing sensitive information.

What you might want to do is segregate the PII as you do the medical records and arrange for a special secure delivery with a person who has to sign for the material so that you guarantee that it doesn't get in the wrong hands. We think a lot about cybersecurity and the risk of stuff going astray. Experts tell us that far more harm is done with hard copies getting mislaid and into the wrong hands. So I think we have to be really sensitive to that.

MS. MCNEACE: And, Bennett, this is Michi. I would just like to add in it might just be beneficial that if you're transferring hard files, as Bennett noted, and to minimize manpower, it would benefit you to secure the entire file as you send it off instead of having to segregate PII or – you got to do the medical. But if you secure the entire file and treat it all as PII, it will just make life a little bit more simpler and –

MR. PUDLIN: Right. All but the medical; right?

MS. MCNEACE: All but the medical. Exactly. All but the medical. But, Gary, you're going to –

MR. GONZALEZ: Right. So if anybody wants to jump in over the phone – excuse me – you can hit \*6 to unmute your line. And please, we want to hear from you. It's a little bit easier to have a dialogue with somebody over the phone than through chat, but you can always certainly rely on that text-based chat, if you're comfortable with it. But again, we invite you to jump in over the phone by pressing \*6 to unmute your line.

MS. CRAM: Hi. This is Terry. While you were talking about password protecting, it reminded me that we are going to password protect the file that we send out from now on. So we'll send the password in one e-mail and then send the file in a different one.

MS. MCNEACE: Thank you, Terry.

We haven't – I don't see any new questions coming through.

MR. PUDLIN: Someone's typing.

MS. GILBERT: Yeah.

MS. MCNEACE: So here we go. We got questions. "So do not recommend picture IDs or Social Security card transfers, given eligibility is assumed good until time for recert. The ownness for any questions about past decision is on the donor. That's why they kept the record, including those records. If these are needed by the recipient, have them brought to the meeting." That was a suggestion or a best practice comment.

MR. PUDLIN: Good points.

MS. GILBERT: Thanks.

MS. MCNEACE: Thank you. So as we're going to move on, we just want to do a quick reminder. February, all transfers are effective on February 1, 2017. Recipient grantees assume – you assume responsibilities for the transferred participants and host agencies. Make sure that all participants are accounted for and, as Judith mentioned earlier, payrolls are set up, paychecks are ready to begin. We do not want participants to go without their paychecks.

MS. GILBERT: Couple of other points to make before we wrap up or open it up for even more questions or things that haven't been answered. This slide talks about the transition funding request. We've gotten several questions about that. We are close to finalizing the memo that will go out to you about that with a form for you to request necessary transition funding that can be used for administrative cost activities that are relevant to the transition period.

And we will repeat what we've said before. The amount of funding that we have available for additional transition funding is limited. So we really have to see what the universe is of everything that you're requesting and that you can support in your request that we will be able to then make some judgments and let you know as quickly as possible what it is we're going to be able to do to help with that.

One of the things we will be asking for on that form are some numbers from you. It really needs to tell us – and there will be boxes for this – about the number of participants that you had last year, if you are a current grantee, and the number that you have now and break that number down as to how many people you're losing and how many people you're gaining.

It really is not just looking at what's the net figure but how much activity and transitioning that you have to do. It probably is more costly and labor-intensive to set up new offices or new areas than it is to close down offices, as painful and difficult as that may be.

MS. MCNEACE: Thank you.

MS. GILBERT: So we will be getting that out to you by mail just as soon as we can possibly do that. But you just need to be thinking about what the comps are and putting it – your budget and your list together that's as close to real numbers as possible. Michi?

MS. MCNEACE: Well, we're winding down. We're actually at the end. So next steps. We would like for you to tell us if there are any needed technical assistance that you need from us. You can send it. You can call your FPO, e-mail us, e-mail the transition box. But if there are any needs, please let us know, and also remember that we will have a national grantee orientation that's scheduled for November 15th and November 17th. All new national grantees are required to attend, and we also opened this up to all national and state grantees. Our next transition call will be on December 1st.

And for that we're going to go back and open it up for further questions and answers before we close out. And we also currently have another suggestion from one of the grantees that, when we talked about transferring picture IDs and Social Security cards, we have, "The recipient will need to have participants bring a proof picture IDs and Social Security card or other proof documents in order to complete the INS I-9 form to put them on their payroll."

We have the response. Bennett, do you want to just jump in there?

MR. PUDLIN: No.

MS. MCNEACE: No? OK. The next one, "We have some previous discussions about making transition dollars reimbursable. Given the small six-, seven-month budget available, especially for small or current sponsors, there is no money to front until reimbursement."

MS. GILBERT: Yes. We're aware of that. However, the fact is that the time that it takes to get your budgets in and make a decision, it may in fact be reimbursable – a reimbursement as opposed to getting money up front. I believe that – I'm not speaking out of turn here, but I believe that every grantee who is – applies for a grant with DOL and gets one is expected to have some kind of cash flow available to them that you're not living from paycheck to paycheck, unfortunately.

But we'll hopefully getting this out to you as quickly as possible and not probably leave – not leaving a lot of time to get all of the responses in because in conversations with some of you, I believe that you're well on your way to coming up – figuring out what your costs are going to be. So it will be a very short turnaround and that's the sooner we can make the decisions, because we've got everybody's request, the quicker we can process payment or letting you know how much money you're going to get and getting the payment out.

MS. MCNEACE: OK. We have another question about transition fund. "Will grantees who are moving into a new area receive any type of outreach from their new FPO?" I'm – are we talking about outreach or technical assistance from the FPO, if you can clarify that for us? And then we'll –

Q: (Inaudible).

MS. MCNEACE: Hi.

MS. : Hi. It's Pat again. Yes. Because we're going into a totally new area, I mean, we've done our research and we're developing partnerships and all of that. But in terms of any type of technical assistance information, policies and procedures from this FPO. Under our current FPO there were quarterly meetings and other activities. So I'm just curious as to the new one. I can certainly reach out to him, but I just wondered if there was something unilaterally that was addressing that.

MS. MCNEACE: Yeah. Hi, Pat. Yes. I would suggest that you do reach out to your new FPO because each regions do do some things differently. So it would be best that you get that direction from your new FPO.

MS. : Will do. Thank you.

MS. MCNEACE: We have another question. "Is the training on 11/15 also for sub-grantees?" Yes. You can invite your sub-grantees to that webinar as well.

MS. GILBERT: Both the 15th and on the 17th.

MS. MCNEACE: 15th and 17th, the national grantee orientation. We initially had it as new grantee orientation. So it's now changed to national. Therefore, it's for all grantees, to include our states and territories.

And our next question is, "One of our sub-recipients who has lost all positions and will need to lay off staff is self-insured for unemployment benefits. If the new grantee does not hire these staff and the UI insurance increases, is this reimbursable?"

MS. GILBERT: That's a question that we will have to raise with the grants office that handles that kind of question because we don't have an answer. But thank you for the question.

MS. MCNEACE: Thank you. That's the only one we have left.

MR. GONZALEZ: Only typed-in question that we have left. Last call for jumping in over the phone. So I'd like to invite you.

MS. GILBERT: Well, yeah. We are at the last slide. I just want to make a comment to you about the FAQs that we have been promising you. This is in writing questions and answers. We have gotten, between the – the few that have come into the SCSEP transition box, some of them before the awards were announced were – many of those were hypothetical questions and are no longer relevant.

So if any of you asked a hypothetical question, if you've got a real stacked situation that needs to be addressed, we certainly can. But between the kickoff meeting and the transition call number one last week, we have – and anything that's come in from the box, we have over 75 questions. And we've just now been able to put them together and see where the redundancies are, see where the two or three questions are all related to the same thing and so we can combine them, etc.

We are going to be putting those as quickly as we can in writing to you. However, what we realized in looking at them is that over the course of these calls and all we've answered almost everything verbally, and so I don't think that there's anything out there at the moment that is a burning question of particular relevance for today that hasn't been answered one way or another. But we still are hoping – in fact, as much as you are busy with all of your activities now, it's been a busy situation around here too.

So I just want to clarify why you haven't gotten anything. Know that we – it's still on track but feeling as though we've probably answered questions anyway and there's less need for them, we anticipated, when we said we'd get it to you a week ago. So you certainly can continue to send them in, but anything that we have on here from today that we haven't answered – I think we've answered all of them, but anything we haven't, we'll add that to the list as well.

A couple of other quick dates to remind you of. We didn't put it on the next steps list, but the transfer lists are due back on the 15th of November to BCT, not to the national office. And all swaps, the deadline for that is the 22nd and letters out and meetings scheduled before the end of the year. Anything else from people?

MS. MCNEACE: We are going to open up for questions, and we do have a question. Says, "We're waiting for info on the new training waiver requirements. Will there be a TEGL?"

MS. GILBERT: Aw, yes. Well, that's another thing that's on the list to do. The TEGL is going to just make official what you already have or will be getting from the grant office about your January money and for your February through June money. And also it will – it makes some reference to additional transition funding, which will – as I said before, is going to come out in a separate memo.

We're going to get back to you – oh, where did that question go? Oh, it's moving around on the screen here for me. Sorry about that.

We will send that, any specific information about the optional special requests – I'm assuming that that's what this question is about. The reality is that, if you have a – any optional special request, whether it's your admin cap or anything else, if you had gotten anything in the first or second quarter through December 31st, it will stay in effect as is for January.

If you want any new optional special request, for February through June, you will need to request that separately as a part of your material back to the grant office. My understanding is that almost all of the notice of obligation or grant award documentation is out from the grant office, and hopefully you've all received them by now. If not, I think there may be one or two left to do that are going out within a day or so.

We will be sending out to you I would hope next week more details about the optional special request, but it basically is what you would have gotten previously as part of – as an attachment to your – the grant request money for the first quarter and the second quarter. I can't comment right now, because I don't want to misspeak, about any changes with that. I know the issue about ATSS has always been one that's of some concern, and I think my understanding – but it's not my authority here – is that that perhaps will be clarified.

But in my view – and this is just me speaking, not speaking for the department – in my view the regulations are really quite clear as to how that works, and it says you basically may do some things, you must do some other things, and there a couple of things that you can't do. So it's basically four points and they're in the regulation and you can check that out but there's no intention at this point, I don't believe, to do anything more than – other than say whatever the regs say is what the rules are. I hope that was a long way of answering – not too long way of answering that question.

MS. MCNEACE: No other questions.

MS. GILBERT: Any other questions or comments or about anything from before, the list that we sent you or to have on the slides about the documented needed to be transferred? Any other points? And also, I guess what would be helpful for us right now, either now or into the box, what is it you need next? What would be most helpful as you proceed? Most of you are really experienced transitioners as a result of a competition on what would be helpful.

We hope that going forward on the next call and any subsequent ones we decide on that we're going to ask some of you to share some of your experiences and get some of your helpful hints that may be useful to other folks. So, anybody, be thinking about anything that you would like to share, the lessons that you're learning as this process goes on.

MS. MCNEACE: I want to acknowledge we did receive a comment about needing technical assistance. So, Terry, there was one that said, "We would like Spark TA."

And I want to also say that on our national grantee orientation on November 17th, that will be focused primarily on performance and Spark. So you might consider joining in on that webinar, and if they're able to answer any of your questions and get the technical assistance that you need during that time, we'll be happy. If not, then we can do a follow-up with you.

Q: Judith, this is Pat Elmer. I have an additional question.

MS. GILBERT: OK.

Q: We did receive a copy of our NOA from our FPO, but the conditions and attachment pages she wasn't able to give us yet. So we've not received those. So we really have questions. So I – not – would you clarify when we would expect to receive that?

MS. GILBERT: You're asking me a question that I don't know the answer to. What I don't know is the exact process. I am making an assumption that those are put in the mail to you in addition to going to the FPO, or do they – does anyone else around the room know the answer as to whether or not they go to the – that the only process by which you get them is through your FPO? In that case, what you've suggested would be a problem, wouldn't it?

MS. MCNEACE: So we would suggest that you would go back to your FPO, and they should be able to research that for you.

MS. GILBERT: Yeah. But we'll also check here and see what the process is.

MS. CRAM: There's a comment in main chat that may help.

MS. MCNEACE: Yes. There's – we do have one. It says – we have a comment from one of the FPOs. It says, "No. They are getting e-mailed, and they started to come today." So with that being said, hopefully you should just look in your – hopefully you'll be receiving it. So they're coming separately, I believe, your NOA then your grant package.

Q: Could you clarify another question about the budget? I guess I got two more questions. The first one is, I think what we heard is that we will be doing two separate mods in – from now on. We'll do one for a budget for just January, and then we'll do a second one for the budget February to June; is that correct?

MS. GILBERT: Where did you get that information?

Q: I may have misunderstood, but I thought it was from a previous call that we were going to – that it was going to be in those two distinct steps. I'd be happy if it wasn't.

MS. GILBERT: We need to clarify that because my what I thought most recent information was was that they were to be combined. So we will need to clarify that, if it's not clear in the materials that you've gotten from the grant office. They're handling all of that, and I sometimes have to confess that things change that we don't always know about.

Q: All right. And then as long as you're talking with the grant office, just a follow-up on that as well. When we saw the NOA – and again, it's just the cover page. So we don't see the conditions – it has an effective date of early November, and usually that means that the money is available as of that date. So, in fact, we went into PMS and we saw that our full money amount through June is in there. However, we can see on the front of that NOA that it specifically says certain amount of money is obligated as of January 1st, and then the balance of the money is obligated as of February.

So our first thought was, this is good news. We've now got the money. So if we have to make down payments on purchasing equipment or a down payment on a lease, we will be able to use that money. But when we saw that they specified the two different dates, certain amount of money for January 1st obligated and the balance for February 1st, we were confused as to whether that means in fact we can't use the money until those dates. So if you could get this clarified for us, it would be very helpful.

MS. GILBERT: We absolutely will, and we will make sure that that's clarified for everyone. I think this will – it obviously won't be until next week, but – because tomorrow is a federal holiday here and – but yeah. We will get it clarified and get that word out. I would think that it would be relevant for everyone.

Q: Sure. Thank you so much.

MS. GILBERT: Thanks for raising that question. Appreciate it.

MS. : Judith, this is Carmela LaKyle (sp).

MS. GILBERT: Hi.

MS. : Hi. Judith, I have a question regarding those kind of unique – I think they were called B slots or something on one of your schedules where you have a donor organization who is leaving and I think it's primarily the large cities and who would select a recipient organization from those that are staying in the particular city. And so my question has to do with, if in fact a transaction has happened where we would be receiving some slots from an organization that – a grantee that is leaving, how is that money going to be handled? Are you going to do an additional amendment to the original award?

MS. GILBERT: So the funds that you're going to get are in – on February 1st is money for the slots, but that's not exactly the same thing as a participant. Bennett, do you want to respond to that or – (inaudible).

MR. PUDLIN: Yeah. I think – hi, Carmela. It's Bennett. I think you're referring to category 2a which are the large counties –

MS. : Right.

MR. PUDLIN: – where there are awards to multiple grantees, and in some cases one or two of the grantees currently there are leaving. Others are coming in or remaining. And there you're not going to get anybody without your knowledge and concurrence. So we've listed for the donor all the potential recipients, some of whom are in a position to absorb new enrollments and some of which are not.

And the donor has to confer with the potential recipients and figure out, of those that are in a position to take the transfers, which one would be in the best interest of a given participant and then make a choice based on that. But it's a discretion that has to go on among all of you, but there's no additional money for the recipients. The recipients got their award. In many cases the recipients got an increased award because the donor's leaving, but in some cases a new donor's coming in. So it varies tremendously from county to county. If you have a specific question regarding your own circumstances, perhaps that's best done offline with Judith.

MS. : Well, no. I was already talking about a transition that was already decided. In other words, a donor organization had selected us in this case to go ahead and do the transition with their existing slots.

MR. PUDLIN: OK.

MS. : So if those transfer of those particular slots – let's say there's 70 slots in the County of Los Angeles, and the – there's maybe 40 of them are filled. So we essentially would take over the entire 70 and proceed to operate them according to the additional monies that we got; correct? In other words, we can fill those slots any way we want, if they're empty?

MR. PUDLIN: Yeah. But I'm a little confused because we're talking slightly different terms here. So if you've inherited slots from someone else in that county, then it's because DOL gave you an increased award there.

MS. : Yes.

MR. PUDLIN: In which case that factored in. Right.

MS. : Right.

MR. PUDLIN: The participants come with it. So however many participants are in that county on February 1st are going to wind up going to you, if you've inherited the slots. The participants come with the slots. I was referring to a situation in 2a where it – you're not necessarily the only potential recipient. And all I was trying to say is that has to be done by agreement.

MS. : Yes. That's –

MR. PUDLIN: If you've inherited –

MS. : That's what I'm talking about, that there are in L.A. County, for example, senior services is departing and there are 77 slots that they – and there's three of us left in L.A. County, and we had already talked to senior services and asked them if those slots could come to us. And the agreement is there.

So – and my question is, of those 77 slots, we obviously will take whatever active participants are under senior services now, and those positions actually are going to fill the extra money we got in the County of Los Angeles – extra new monies we got in the County of Los Angeles. Am I correct?

MR. PUDLIN: Yes. That is how it is. I'm just trying to look it up now so I can be sure I don't misspeak, but yeah. That's what we would expect would happen. Let me just get a quick look. Right.

MS. GILBERT: Maybe –

MR. PUDLIN: So in this case, yeah. You did receive additional slots due to SSA not being in that county any longer.

MS. : Right.

MR. PUDLIN: Right. So yeah. So there's no adjustment in your budget, but you take whatever participants are still enrolled on February 1st, and then you enroll additional ones up to your authorized budget.

MS. : Right. Now, that's OK. I'll send a separate question because we have another question in Philadelphia, but that's OK. Thank you. You've answered this.

MS. GILBERT: Thank you, Carmela.

MS. : Thank you.

MS. GILBERT: Any other questions before we let you all go for the long weekend? Hopefully, it's a long weekend for everyone. You know how to find us and reach us. So I think with that I want to thank you all and turn it over – back over to Gary.

MR. GONZALEZ: Thank you, Judith. I want to thank everyone for being with us.

(END)