**WorkforceGPS**

**Transcript of Webinar**

**Understanding Grant Closeout for TAACCCT Round 3**

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LAURA CASERTANO: Again, I want to welcome everyone to today's "Understanding Grant Closeout for TAACCCT Round 3" webinar. And I'm going to turn things over to your moderator today, Cheryl Martin. She's a program manager for TAACCCT grants at the U.S. Department of Labor. Cheryl?

CHERYL MARTIN: Hi. Thank you, Laura. And yes, this is Cheryl Martin and welcome today; so glad you could join us.

It was interesting to see the polls before that, and we're going to come back to those in just a moment. But before we get to those I'm going to just tell you where we are on the map of all the different technical assistance offerings that you might get related to TAACCCT.

We're at the top left-hand corner. So all the people who will be speaking on this call today are from U.S. Department of Labor, and I'll be introducing them in a moment. Sometimes on these calls you get folks from our TA providers, JFF or so forth, or Cal State; there's TA offered by NFF and used to be TA that was offered by a lot of other places over on the blue box on the right. But today you're getting it – this is coming directly from the Department of Labor.

Your presenters today include myself. Then we have from our closeout office at DOL – normally they don't think about your closeout for a little while, but for TAACCCT they do a special thing. They come on and tell you all about it now so that you can start thinking about it while people have time to put everything in place, because it is a considerable amount of planning that is involved.

So from our closeout office we have Latonya Torrence, we have Meron Assefa, and Avery Malone. And when we get to their part you'll be hearing from them.

Today we're going to cover a number of things. I'm going to go over some key dates. We're going to talk a little bit about telling your story and showcasing your innovations. We are going to talk about final performance reports and other kinds of numbers; submitting your grant products and deliverables; and we're going to talk about the closeout process. So we have a lot to cover. That's why we've allowed 90 minutes for this webinar. We think based on the past that we'll probably be talking for about the first hour of that.

There'll be four points in here – I think there are four – at which we will stop and see if you have questions that have come in. If you have questions please enter them in the chat box throughout the time and we'll sort through them and answer as many of them as we can. I think we'll have plenty of time for that at the question points and/or at the end.

So let's go back to the polls and see what – if you can put those back up there, Laura. Thank you.

So it looks like most of you are from round 3, but there's a smattering of folks who are ahead of the game from round 4, which is great because it's really good to start thinking about this stuff early out, especially if you're a consortium lead. And some of you are in both rounds or in multiple rounds, so there we go.

For those of you who are from round 3, it looks like about half are leads and about half are consortia members. Of course, round 3 is a different way of handling all of that than the others and we'll talk about that in a little bit. Most of you have not been through a closeout for a TAACCCT grant before, so this will be good information for you to have.

In terms of what you're looking to get out of today's webinar – that may have been in the main chat before and I'm not seeing it – but if there are questions that you have, obviously, just put them up there and we will try to address them.

So let's now move to the next slide. This is the overview. I'm going to talk a little bit about key dates; a little bit about telling the TAACCCT story. I want to point out to you that right below that slide there's a file share box that has four things in it. The four things in there are today's PowerPoint, which you can download if you want; right above that is the compiled TAACCCT FAQs.

If you're on this webinar for round 3 closeout last time, we gave you a little bit of a different FAQ doc. It was just for closeout FAQs. But since that time we have compiled all the FAQs into one document to try to make your life a little bit easier, so you will find that document there and you should have that already. But in case you don't – and then there's a section of it that has to do with closeout.

The last two documents that are in there relate to your third-party evaluations. I will get to that a little bit later, but just know that this is some guidance that was given out to round 2 and it still applies to round 3, so we thought that we would share that now as well. I'll say a little bit more about it shortly. Meanwhile, let's move to the next slide and we'll talk about key dates.

So today we are more than three-fourths of the way through the period of performance for round 3; hard to believe, I'm sure, because you can probably – some of you, at least – still remember if you were here on day 1 what it felt like to be here on day 1. It seemed like there were a lot of things to do and a lot of time ahead to do them, and now suddenly there's still probably a lot of things to do and a little bit less time to do them.

We have about 1.5 months left for the grant-funded program activities part. We'll get to that in a minute. So of course, the start date, you all know that. Some key dates in here; submitting your interim third-party evaluation, that should have already been done, probably. There was a date on that in your evaluation plan, but if you aren't sure whether that happened please go back and take a look at the date that you said you were going to do that and make sure that you send that to your FPO.

So as I said, we are here, 40 or so months into the 48 months of this grant, and a couple of things that will be happening next. We will be sending out some data validity letters. This would only apply to leads if you're in a consortium. In the past you may have seen one of these where if we had some questions about your performance data, that we said we just wanted to double-check and ask you to make sure that this is correct; will you please double-check it? Those kind of letters, if they're applicable, if we do have any of those kind of questions, will be coming out in early spring.

Of course on March 31 that is the end date for your grant-funded program activities, and as you know, that was extended from September 30, 2016. When you got your SGA it said you had three years for grant-funded program activities and 12 months for follow-up and data gathering. That changed to three and a half years and six months, and there's a letter that specifies all of that if for some reason you missed that. It went out a while ago, and your FPO would have that as well.

Anyway, so the last six months, as you know, are to finalize your data gathering, your reporting out, finishing up the third-party evaluation; and as you see in red, posting of product deliverables. If you haven't done that – many people already have gotten started on that – those need to be done by September 30. So don't start on September 29 because that will take you a while. We will get to that in just a little bit.

Also on September 30 is due the third-party evaluation. That can present some challenges in terms of data, but we're going to talk about that a little later. I'm just going to go over these dates at a high level now. Obviously the end date for round 3 – the end date for the period of performance is September 30. And then you will be submitting your final annual performance report and your final quarterly narrative performance report, your final 9130 – all of those things are due – as usual, like they would be any other year – by November 14th, 45 days later, except now they're called final instead of not final.

And then any other remaining closeout documentation you would have up until December 30 to submit that, and we'll get into those details again there as well.

The period of performance ends September 30. There are no extensions. The funding source that we have here does not allow us to give any period of performance extensions. Those are just not possible. What we could do was give you that extra six months for grant-funded program activities, and that's why we did that, because people were asking – clamoring for that. But there's no period of performance extensions like there are for some other grants; doesn't work for this one.

OK. Let's talk a little bit about the fun part here, of some of the things that we get from you – and hopefully the fun part for you in terms of developing them as well. So one of the things that we really want people to be focusing on right now is telling your story and putting yourself in the spotlight. So your QNPR for this month will be due soon, but of course it has a pretty limited character number. So if there's other things that you want to tell us, feel free to just send a supplemental piece to us through the TAACCCT mailbox.

If you have done any videos or success stories for individuals or for employers, if you've done any booklets or even books – sometimes we call them "brag books" – we've seen that from grantees, like things you developed for yourself that basically tells your story.

There was one from a grantee that listed every single one of the programs that they developed in their entire consortium. I think there were like 57 or something like that; one per page. Another one that just told the whole story of how their whole grant worked and how they set it up and all of that. Any of that kind of stuff we would love to see. So if you have it now, please send it now.

What we're particularly interested in hearing about – and even if it's just a quick email or a document – is what you're going to be sustaining. I know many of you went through the Sustainability Virtual Institute with JFF and we already have identified some of that with you. But if you didn't, we would love to hear that from you. Send them as you have them, send them by September 30. We will accept carrier pigeon (sic), whatever. We just want to hear about it. So send it to your FPO and the TAACCCT mailbox. If you have any questions about that let us know at the TAACCCT mailbox.

Let's turn to the third-party evaluations. I'm getting some of the shorter stuff out of the way here at the beginning. Those are, as I mentioned, due on September 30, 2017. One of the challenges that that can present for people is that your performance data, you can be counting stuff all the way up until September 30; and in fact, a little bit beyond that for follow-up kinds of things. But if your report is due on September 30, well, then obviously that's not going to add up, right?

So it is acceptable to use a different data set for your third-party evaluation than you're using in your final performance report. In other words, you might choose to report on your early cohorts in your third-party evaluation, and add additional data to your final performance report. You have questions about that, you can send them to the TAACCCT eval address there and/or the TAACCCT mailbox.

When it's time, when you are ready to send your third-party evaluation – which can come in before September 30th, but if not, by September 30th; this isn't part of the closeout things that you turn in at closeout; okay? You don't submit it to the closeout shop. If you do they'll send it to us, but you don't submit it to them.

To submit, really you need to send it to three places – your FPO, the TAACCCT mailbox, and TAACCCT eval. That will cover everybody. If you don't mind, that would be very helpful to us. Meanwhile, if you have questions about any of this you can send them to the TAACCCT eval mailbox or to the TAACCCT mailbox and we'll trade them back and forth if the other party is supposed to be answering it.

What's in the file share box that's related to this is the round 2 guidance on third-party evaluations. There's two documents in there, one is called "Guidance on TAACCCT Final Evaluations" and the other one is the "TAACCCT Third-Party Evaluation Executive Summary Recommended Outline."

We're really asking that you work with your third-party evaluator to use that suggested outline there; not required but it is strongly suggested, and there's two reasons for that. One is because it will benefit you. If you ask your third-party evaluator, I want you to do it this way because I want to see it this way, you'll see when you look in that document that the outline will give you a lot of really helpful information right up front.

And, you know, selfishly, we want it because it will benefit us. When we're trying to look at 71 of these or however many of – when we're trying to look at 50 of these across evaluations, it's very helpful to have it all summarized in a similar way up front.

We are going to be doing a webinar – actually, Urban, who's doing the evaluation component of things – is going to be doing a webinar on third-party evaluations probably in April, around that timeframe; and we may be updating this guidance just a little bit. Mainly it would be to provide you some examples. Nothing that's in there is going to change in terms of – so you can send this to your third-party evaluator now and say, please use this, and that will help you and everybody else down the road.

OK. So we're going to move to – I'm seeing some questions here about calculating final APR. We'll get to that and we'll answer those questions in just a little bit.

Some key closeout differences for round 3. So know you guys are special. All my TAACCCT grantees are special, but TAACCCT Round 3 are special in a certain kind of a way, and that of course is that each of the consortia members have their own grant number. So for closeout there's a little bit of a difference in how that all works.

For single-institution grants, you can ignore all of this because there's no differences for you. But if you're part of a consortium and you're on this call – and it looks like we have a lot of consortia members on the call, which is great – as always, the round 3 consortium leads will gather performance data and report that in the aggregate for the entire consortium. But for round 3 only, each consortia member with its own grant number will receive a separate closeout letter and will conduct closeout separately.

So our closeout team gets to do something like 190-plus of these instead of the usual number, but they're actually telling us that it's a little bit easier from their perspective. This is where having separate grant numbers comes in handy.

Each consortia member would submit their own financial report and need its own indirect cost agreement. We'll get into the details of that in a minute. If you were part of another round, this round will feel different come closeout. I'm sure it felt different already, actually.

If you're in round 4 and you're listening to this call it's going to be more like it was in round 1 and 2 where all the same information is required for each of your consortia members but it all gets channeled through the consortium lead instead of coming separately to the closeout office.

All right. Let's talk a little bit about final performance and progress reports, and when we get to the end of this section is when I will be taking questions about final performance and progress reports.

OK. So heads-up – I already mentioned this – you'll receive data validity letters in early spring.

And also I wanted to remind people to use the compiled TAACCCT FAQ that is in the file share box here. If you have older versions of FAQs you might want to just toss those out and use this instead. They're not – it's not that it's different information – I mean, if it is different it's marked clearly in there, is what I want to say. But for the most part it's the same answers. There might be slightly different wording. There's additional information in this one. Everything that's shaded in here is new from – hasn't been published in an FAQ before. So there's some new information that will be helpful to you.

And any information you hear today and you see in that compiled TAACCCT FAQ supersedes anything that was provided in any earlier closeout webinars. Just put those all out of your head, throw those away, go forward from here today. Although having said that, it's not that different.

OK. Final progress report. This is thinking now for September 30. Obviously you've got a QNPR that's due now and another one after June 30, but this is the last one that you're going to turn in.

So the last quarterly progress and annual performance reports will serve as your final performance and outcomes reports. Again, the consortium leads will gather that information and report it for the entire consortium, as you always did. The final QNPR will provide both quarterly and cumulative information on grant activity.

The final APR will, as always, provide only annual information on your grant activities – so only things that happened between October 1, 2016 and September 30, 2017; just like you were always supposed to be doing it in the past. If this is new news to you today – because we've had some issues with that before of people reporting cumulatively – that's not the way it's supposed to be.

You can easily fix that going forward; there's not a problem with fixing it. But we definitely only want you to be reporting one 365 days' worth of data in your annual report. If you want to see the aggregate, it comes up in what's called the thermometer report in that system. It's a good idea to look at that thermometer report and compare it to what your aggregate or cumulative numbers are. And if those are different, then you need to figure out how they need to be reconciled. And if you have that issue just send an email to the TAACCCT mailbox and we'll help you figure it out.

When to report, sort of the same, as you always have been, not later than 45 days after the end of the reporting period, so November 14th. In many ways, it's the same as any other report.

So for your final QNPR we're looking on information on grant activities during the last quarter, which is probably not going to be that much. You've finished up your third-party evaluation, you'll posting your things, getting more data, those kinds of things. But we're also going to be looking there for cumulative information on grant activities during the entire period of performance. And if there's not enough space in that document it is totally fine to attach a supplemental document if that's an easier way to do it.

For example, in Section C your status – (inaudible) – estimate, you might say this quarter we had one new employer entrusted in hiring graduates. Cumulatively over the course of the grant, seven employers total hired graduates throughout the grant period.

What to report, continued, your final annual performance report. The final APR will reflect the activities since the last one, since the third year APR; that is, the fourth year program activities, those first six months, in addition to any activities that occur during the second six months – this says "during the closeout period." Sorry, that's not right. It should be any activities that occurred during the last 12 months of the period of performance.

Grantees may use the fourth year as a follow-up year, or use the first six months to continue grant-funded program activities and the final six months for follow-up. What I'm hearing from FPOs is that most all of you are choosing to use the first six months to continue grant-funded program activities, so for most of you that will be the relevant piece of this here.

But either way, you will submit only one time, and this final APR should be submitted by November 14, 2017.

So what to report. When I talk about this now for the annual performance report I'm going to assume that you're using that first six months up until March 15th, 2017, to do grant-funded program activities. So if you do, then you can continue to report on all your outcomes – B.1 to B.10 – for the first six months of this final year.

During the final six months of the grant period, only the follow-up outcomes – B.7 to B.10 – should be reported. I'm not going to go into the weeds on this too much, but basically you have a new participant during the first six months, great; you count them then. But starting April 1 there would be no more new participants because you can't have any more grant-funded program activities after that.

However, if you had somebody who completed – and typically the way this six-month thing – I know people say, well, that doesn't map to our calendars at all. We understand that. It isn't that March 31 was supposed to map to your calendar. What we were basically doing by extending the six months was to allow you to finish your fall semester so that anything – that you graduated people or completed by December 31 in that semester, those folks could be completers. And then if they got employed in January or maybe March-April-May, even, if they got employed in the last six months or they had retention during the last six months, all of that stuff can be reported then, those follow-up outcomes.

If grantees don't choose that six-month option they should be reporting only follow-up outcomes in that final annual report for that fourth year.

Supporting documentation. You must have participant and financial records to support the aggregate data submitted. For example, documentation that individual students were tracked and reported as participants in outcome B.1 in months 37 to 42. And as we've said already, no grant funds can be spent on programmatic activities in the final six months.

I do want to say, however, that we expect that you are doing the same things, right? Like you might have started a mechatronics program and you continue having the courses in that program through the semester of spring semester. It's just that after March 31 those activities have to be paid for using a different funding source.

This is, after all, seed money. It's capacity-building money. It's there for you to get things stood up – I don't think I have the right tense there – to stand things up and will be continued after the grant. So we expect that many of those activities will continue; they just can't be done using grant funds after March 31. If you have specific questions about that you can talk to your FPO and/or include the TAACCCT mailbox if you feel that would be helpful.

So I'm going to move into some FAQs because I think this may answer some of the questions that you're putting up there. And if it doesn't, then we'll tell you how to handle those.

The first one is, "How do we report additional follow-up outcomes that were achieved during the grant closeout period?" For this situation there are some things that you can count that happen during the closeout period.

Say a student meets the definition of B.8 or B.9 during the closeout period. You may count them in B.8 or B.9 as a follow-up outcome. So in other words, if they were retained or that kind of thing during that timeframe you can count that as a follow-up outcome.

So then you're saying, "Well, but the closeout period is 90 days and the reporting period is 45 days." So report the numbers that you have by November 14, 2017. It's really important to submit that by then, because your FPO has to do a number of things right then, starting November 15, and if they don't have your data they cannot do that.

However, if you want to amend your reports – and this particularly applies to things like, I don't get my wage record data until six months later or three months later or whatever, so I don't have that wage record data, you can amend your reports with any additional follow-up outcomes during the entire closeout period.

In fact, if you have some wage record data that you need to amend your reports based on, we will accept that for up to a year after in terms of your performance data. It had to have happened during the time period of the grant, like the person was employed by September 25th, 2017. But if you don't get your wage record data for whatever reasons until six months later and it shows, yes, they got employed on September 25th, you can amend your performance report by contacting your FPO to have it unlocked and we'll help you with that.

See Question VII.D.4 in the compiled FAQs for more information on that.

Another question. "How long should we keep our files accessible before putting them in archive?" So you need to follow your institution's policies on that, but your policies have to be consistent with federal requirements. So if you're not sure about all of that, talk to the people on your campus who keep track of those things. It's at least three years. The three-year clock may be reset if there is an audit or an open investigation, so you should make sure that you have it in a just-in-case situation there.

"Can we save e-files, disks, etc., and destroy all paper files?" See above. If your institution's policies allow to do that and if it's consistent with federal requirements then you can, but that's what you need to look to there. You need to look at your institution's policies and you need to make sure that whoever pays attention to those policies understands what the federal requirements are as well.

And make sure that you're doing the right things around the PII, the personally identifiable information. That's sort of a whole separate piece about that. There's a whole TEGL about that. You see the reference there that says what you have to do with your PII. And for more information, see the compiled FAQs.

"Where and how should we destroy participant files?" It is the responsibility of the grantee to ensure that they're all stored and retained in accordance with federal regulation as well as state and organization policies, same thing. And here's a reference to another document that gets into the weeds on that if you need that.

Let's go to the next one. So if you want to know how do we do, or what do our numbers tell us about how we did, perhaps your third-party evaluator is helping you with some of that. But you can always go in at any time and look at your thermometer report, which shows up in your performance reporting system.

There's an information sheet here that explains how that works and how you can use it to see your cumulative information and so forth. And like I said, if you look at it and you go, huh, that doesn't look right, well then that's a good double test that you might need to go back and make some corrections to some of the earlier reports.

I'm going to pause here and see the questions that we have. One question is, "What is QNPR?" That is the quarterly narrative progress report. That's the narrative report that you turn in every quarter as opposed to the numbers – there are a few numbers in the QNPR as well, but for the most part your performance numbers are in the annual performance report. Little bit different than other grants at least at DOL, where we require you to do performance reporting quarterly. But TAACCCT is special in many ways.

"How should we calculate the final APR year retention?" I believe that that question is handled in the FAQ. I'm going to refer you to the FAQ for that, and if you still have a question please send it to the TAACCCT mailbox.

"So I'm in round 3; how does DOL feel about supply expenditures this late in the grant?" Yes that is definitely a red flag and you should talk to your FPO about that, but I hope you're not doing that. That's an FPO question.

"Do we count new participants between April and September in completers?" OK. I hope I've answered that question already. You would not count new participants between April and September because you're not doing any – you don't have any grant-funded program activities.

You can only count in your performance what was funded with grant funds. So if you're not spending any grant funds on program activities between April 1 and September 30, you can't count the grant funds for those program-related activities – the training, the bringing them in, the training them, the completion and that kind of thing.

The follow-up outcomes, you can. If those people who were still involved in one way or another on March 31 have gotten employed and retained and all of those – you know, if they've gotten the wage increase, all of that kind of stuff, those follow-ups you can count during that time. So not completers, but the follow-up – like B.7 to B.10, I believe. There's a whole section on this in the FAQ that you can read through and get the weedy (sic) information about that.

"Will the APR and QNPR be available prior to September 30 for data entry?" Unfortunately, no. That whole system is – you know, it's one big system and it only opens on the day after that, like October 1, so it will not be available before then.

However, you know what you're putting in there. For instance, if you're in a situation where you're the program manager and you're peeling off to get your next great job and moving on to other things and you're going to have to hand this information to somebody else, just take what you've done in the past and just map it and say here's the numbers that you should put in there. In B.1 put in number 34; In B.2 put in number whatever-whatever. So you can provide that information to somebody else, but unfortunately it won't be there available until October 1.

"Will a corrected document be sent out with what I just referenced, slide 14?" So I think I can correct – just a minute. Let me go back to that. It was actually I think slide 16 when I said what to report. "The final APR will reflect the activities since the third year APR, that is, your fourth year program activities in addition to any activities that occur during the closeout period."

I will correct this for the version of slides that is posted to this webinar when we post the transcript. So yes, I will send a corrected document for that.

"What if you're on a quarter system, not a semester? Our winter quarter ends March 17; can we complete quarter?" Yes. You can count anything up until March 31. Or if you're on some kind of a rolling – like people enroll every week for whatever – as long as it happens by March 31 you can count it.

In that FAQ document there's actually a little chart at the very end. It's called Appendix A; it's page 52. You see there that it says, "Operating on a Traditional Semester Schedule." That applies for that. But yes, if you have completers on March 17 because you're on a quarter system or some other kind of a system, yes, you can count them up until March 31, midnight, if they complete by then. Let's see what else do we have.

"For credit hours completed in APR IV, may we count the first eight-week class that ended before March 31st?" Sure. Anything that ends before March 31 you can count.

"Did I hear correctly earlier in the webinar that data validity letters only applied to consortiums, not single-school institutions?" No. If I said that – I don't think I said that, but that is not the case. Data validity letters will be sent out to – could be sent out to single institutions or consortium leads.

What I meant – I may have said was if you are a consortium member, it's only going to go to the consortium lead for data validity, because they're the ones responsible for putting all of those numbers together. You may not get a data validity letter. If you don't, that's good news, because that means that we didn't notice anything in your data that you turned in that raised any questions for us.

However, that doesn't mean that your data is perfect. You're the only ones that can tell if your data is correct. If you look at your data, maybe somebody else submitted it last time or maybe you just looked at it this time, and as you're looking through the FAQs you notice something new and different that you're like, oh, shoot, I don't think I did it that way.

Get in touch with your FPO. Work through it. You can correct those earlier APRs and all of that, and that's the whole point of the data validity letters as well.

I am going to take a couple more questions here, but I need to have time to move on to my colleagues here, so let's see. "B.3 is not a follow-up. Nothing that low is a follow-up." It's the follow-up outcomes that come that you can do later. And if you have questions about that, check the FAQ.

"Will the final QNPR have more space?" I don't think so. I completely agree that the current character limitations are limiting. That's why I said don't worry about that; just send a supplement to us. It's fine. Obviously send it to your FPO as well, but if you want to say more – and we would love it if you say more – just put it in whatever other – you know, Word document, email – whatever you want to do and send that to us.

"How long will we be able to draw down funds from the payment management system?" That's a question for Meron and Avery. You're going to cover that?

MERON ASSEFA: Yes.

MS. MARTIN: Hold that question.

"What functions are allowable costs in the final six months?" If it has to do with your third-party evaluation; if it has to do with counting people, tracking them, tracking down all those students and saying did you get employed, you can do that. If it has to do with nagging other people who are supposed to give you wage record data, that's allowable cost.

If it has to do with your third-party report, yes, but also like those deliverables. So your profs have come up with 37 great new programs of study and 554 courses – and I'm making this up, right – but you've got to get all that stuff loaded on SkillsCommons. All of that loading, having the people do the reviews of that, that can all be done during the last six months.

And actually, some of those questions are coming up in the product submission process, and I'm going to move to that now. If we have time I'll come back and answer the other remaining questions at the end.

The product submission process. If there is one thing to get started on now, this is it. You've created your account on SkillsCommons already, right? I'm hearing all of you who are un-signed up saying, oh, yeah, sure, I've done that, I've done that. If you haven't you should do that right now.

Because as soon as you do you're going to start being able to access a lot of really good help from the SkillsCommons folks. For one thing, it's great if the curriculum is up there even in draft form, and of course you can always go and check out what others are doing on the same topic.

But once you've created an account, then you can access what we call 1-800-Rick Lumadue (sic), who's the guy who answers all of those grantee questions. He will help you through that process. There's webinars that we've done before about how to do this. You should look at the webinar first. Today is just really going to be a high-level overview of that. But there's a lot more information on there.

In fact, I think that I am going to not dip into these slides on these grant products and deliverables right here right now, because I want to turn this over to our colleagues about the closeout. But there's a lot of information that's here. There's a lot of information that's in the grantee closeout – I'm sorry, in the FAQs under posting your deliverables.

If you go forward a couple slides, we go to the next one. This is support@ SkillsCommons.org. That will get you access to a lot of help. There's a lot of support right there on the website.

We've repeated some of the most commonly asked FAQs in the next slides here, but I want to go all the way through to slide 33. "Are activities and costs related to reviewing and posting deliverables allowable during the final year or six months?" Yes. Costs related to reviewing those deliverables – you know, you have to have third-party reviews of those. This is all different than your third-party evaluation. That's a whole different thing.

This is third-party review. It's like peer reviews. It's like getting published in the peer review journal, kind of. Not exactly, but it's kind of the same idea. And all of those deliverables need to have those reviews done. You have to post that review information along with the deliverables.

As you can imagine, that is not something to start doing on September 29th. You need to be starting that now and making that happen, but you can continue using grant funds for that activity even up until September 30th.

All right. If you have questions about that business, I'm going to let you put them in there and we'll take them at the end. I'm going to move now to the grant closeout process and turn it over to Avery, right?

AVERY MALONE: Yes.

MS. MARTIN: OK. Thank you, Avery.

MR. MALONE: Thank you, Cheryl. Good afternoon. It was a lot of information that you provided, so I feel like we've all been well-fed and well-informed. I will do my best to navigate these recipients through the grant closeout process as efficiently as possible.

First, I'd like to thank my leadership, Laura Watson in the Office of Grants Management; my division chief, Latonya Torrence; and my direct supervisor, Meron Assefa, who is also a grant officer and the supervisor of the closeout unit.

So I see that we have a mix of individuals in this audience and I'm thankful for the poll questions that we were given to give us an idea of who we're actually speaking to. And since this is mostly round 3 we can focus on that as we walk through this closeout process.

So grant closeout – what is grant closeout? Closeout is the process by which the federal awarding agency determines all applicable administrative actions and all required work under the award has been completed in accordance with all grant requirements. In short, it's completion of the grant life cycle.

There are multiple phases to the grant life cycle. We have the award phase and then we have the post-award phase. The post-award phase includes the information and activities that you all perform and conduct and submit during the performance of the grant as well as the grant closeout process itself.

So why do we close the grant in the first place? It's to mark the end of the relationship between the federal awarding agency and the grant recipient. Although we say parting is such sweet sorrow – (sic, chuckles) – we need a way be able to gauge and determine the effectiveness of our programs and the work that you're done. So essentially it gives us a way to gauge how well we were and effective we were with our operation of the program and assisting you in being effective in your operation of the award.

Differences for TAACCCT round 3 grantees. I believe we saw this information earlier in the presentation so I won't spend a lot of time. Single institutions, no difference. The biggest difference is for consortium members. Each one of you have been given an individual grant award number and you will be required to submit documentation related to that specific grant award number, which means you have your own financial reports to submit.

You have your own indirect cost rate agreement if you're charging indirect costs to the grant, you'll have to submit that; any indirect cost calculations that we require as well as a list of any equipment that you purchased with these grant award funds.

So who are we? As I started earlier, we are the Office of Grants Management. In particularly, the closeout unit falls under the Division of Policy Review and Resolution under Latonya Torrence. She is over three units: the policy unit, the audit unit, and the closeout unit, which consists of, again, the supervisor, Meron Assefa; myself, a grant officer; and seven well-trained resolution specialists who on average close anywhere between 700 to 1,000 grants a year.

You may be wondering how we handle that workload. Next slide, please. In order to do that, we have to track our workload for at least a year out in advance. We do that in a cooperative manner with our Office of Information Systems Technology. They provide us a report regarding whose grants are approaching their period of performance end date. We then compare that with the information we have in our electronic grants closeout system.

Once we confirm that we then assign these grants to individual resolution specialists that will begin the process of preparing to send out information to each grant recipient regarding their closeout. Now, on this slide we say that you will receive this notification in an email format not less than seven days prior to your period of performance end date. In most cases you'll probably see this well in advance of that.

However, if you reach the seven-day mark and you have not received an email from the closeout unit regarding the closeout process that is approaching, I would suggest that you reach out to your federal project officer and have them contact the closeout unit so that we can get right on that. Next slide, please.

When does closeout begin? Closeout begins once you reach the grant period of performance end date. Once you reach that point you have 45 days to submit your final quarterly financial report. How do you ensure that you've submitted your final quarterly financial report? You must check in Box 6 a radio button that says yes or final. We will have an example later on in the slides to give you an idea where you can find that particular place on the report.

Approximately 75 days after that your resolution specialist in closeout will send you a follow-up reminder to let you know, hey, you have roughly 15 days or so before every document is required to be submitted so that you can remain in compliance with your terms and conditions of your award.

Ninety days after the period of performance you should have submitted every document that is required in order to complete the closeout process. That's financial reports and any other documentation that may be required with regards to your program.

Just a reminder, we wanted to highlight this point, that grantees are not allowed to direct-charge staff time to work on the grant closeout after the period of performance end date. Again, all charges that are incurred must be within the period of performance end date. So please, please do not charge anything with regards to closeout activities; otherwise our thorough staff will be sure to point it out.

MS. MARTIN: This is where your indirect cost comes in, right? Like it covers it?

LATONYA TORRENCE: Yes. They have to put it – (inaudible).

MS. MARTIN: OK. And I just want to go back to what you said about what's due. I mean, the deliverables and the third-party evaluation is due on September 30.

MR. MALONE: OK.

MS. MARTIN: Your performance report, annual and quarterly, is due on November 14, at least that first version of it. And if you want to amend it later, that's OK, but you've got to turn in what you have by November 14th. It's only those other closeout documents that you can turn in after that.

MR. MALONE: As Cheryl just stated, remember, closeout won't move forward until we get clarification from your federal project officer that you have submitted all those reports prior as well. So be mindful of that.

Closeout continued. So once you've submitted all of the closeout documentation that's required within that 90-day period, your resolution specialist will begin the process of ensuring that you have complied with all terms and conditions of your grant award, any applicable statutes or regulations that may apply to your grant, and they will begin the reconciliation process to ensure you've drawn down the proper amount of funding, that it's in line with your cumulative expenditures, and things of that nature.

Now, all grants – we've put this here just to show you – all grants should be closed within one year of the expiration date. That additional time is for the closeout resolution specialist and the closeout unit to make sure that we have addressed any other issues of compliance; we have had the opportunity to reach out to you if we need any further clarification based on the documentation that you've submitted. That is not additional time for you to submit closeout documents.

We have also been placed under new guidance with the GONE Act – the Grant Oversight and New Efficiency Act – that Congress passed and has established effective at January 28, 2016. This pretty much to sum it up says that any grants that the closeout unit does not close within their one-year timeframe we will be required to report to Congress. And in our interest and yours as well, we would like to keep our names and yours off any reports that need to go to Congress as to why we didn't close these grants in accordance with their wishes.

Closeout deadline. I believe this was also presented in the prior slide, but again we like to re-emphasize because we believe communication is key. The more we communicate, the more you know; the more likely we are to transition through this closeout process with ease.

September 30th, 2017 your grant expires, closeout begins. Your final quarterly financial report is due 45 days after. That places us around November 14, 2017. December 30th, 2017 we are at that 90-day mark and you should have submitted all related closeout documents.

As a reminder I will go back to the question that was asked earlier in the presentation regarding the drawdown of funds from PMS. After the 90-day mark – 91 days out – you are no longer allowed to draw down funds from PMS without permission from closeout. Now, we understand that you're all on an accrual basis and sometimes these things happen. However, if you find yourself in this position you'll be required to provide us with justification as to why this occurred and how you will strive to ensure that this will not occur again in the future.

So we're going to go through some of the documentation that you'll see during the course of this closeout process. On the screen now we have the closeout notification letter that you should receive again with seven days of your period of performance end date. I will direct you to the very top of this letter. And if you see, there's a space for the grant number that is assigned to your organization – of course this is just a sample – but as well as the period of performance expiration end date.

If you go to the middle of the page – and it's bolded – you see the link for how you will access the grant closeout system in order to submit the grant closeout documents. Now, just to let you know, you may be familiar with this link because it's the same link that you use to submit your financial reports.

So again, you will access the grant closeout system through the same web portal that you use to submit your financial reports, and you'll actually use your financial password in order to enter the system.

At the very bottom of the letter there's one last sentence that says, "Inquiries should be directed to the resolution specialist." Now, this is only a sample email, but in the actual email you receive there will be a name identified, a telephone number identified, and an email address so that you will be able to reach out to that resolution specialist to ask any questions for clarity. Next slide, please.

The end user manual. This will come in a follow-up email. Once you've received the first closeout notification this second email will come out and there will be an attachment which will provide you with end user manual guide to help assist you in navigating our grant closeout system.

Now, it's fairly straightforward. However, if at any point in time you encounter any difficulties or any confusion with the instructions given, do not hesitate to reach out to the resolution specialist whose name, number, and email were identified in the initial closeout notification.

Yes?

MS. MARTIN: Can they go to that link and get a copy of it now? Go back to the previous slide.

MR. MALONE: That's a very good question. I am not sure, Cheryl.

MS. TORRENCE: No. I mean, actually they can go to this link and this link would provide them how to access. But in order for them to have access to the package, we have to send –

MS. MARTIN: You have to send it. OK. Thank you.

MS. TORRENCE: Yes. This link will give them – they can download the manual. But for the forms we have to send them.

MS. MARTIN: OK. But the end user's manual is there.

MS. TORRENCE: Yes.

MS. MARTIN: OK. So they can find that now.

MS. TORRENCE: Yes.

MS. MARTIN: Great. Thank you.

MR. MALONE: All right. We'll move forward.

Elements of a grant closeout package. I'll give you a brief run-through of these documents. Essentially this is the full package for a non-governmental entity that has also purchased inventory and also charged indirect costs to their grant.

To give you a breakdown, the final quarterly 9130 report and the closeout 9130 report – essentially your financial reports; you should be familiar with the quarterly one – the closeout is not much different. However, it is there so that you have access to make any later adjustments that may be required.

The grantee's release is a form for you to sign off on. Essentially it relieves ETA of any future financial obligations. You will place the cumulative expenditure amount for the total amount of grant funds that were charged for this particular award. Note that this amount will also be the same dollar that will be reflected on the closeout 9130 federal share of expenditures.

Grantee property/inventory certification. For clarity, we're not talking about real property. In this case we're referring to equipment that would have been purchased under the grant award; and for our purposes, equipment is – well, we have a regulation that we cited, I believe, at the very beginning, which is 29 CFR 95 and 97, which gives you guidance regarding our inventory equipment requirement.

The long and short of it is items of equipment that have a fair market value of 5,000 (dollars) and greater at the point of closeout, you will be required to provide us with further documentation as to what you have in your inventory, as well as your intentions for future use.

The grantee detailed statement of costs is another form that shows us and indicates how you spent the ETA funds in accordance with your approved 424-A budget form. If you charged indirect costs to this grant you will also be required to provide us with a copy of your signed negotiated indirect cost rate agreement as well as the indirect cost rate calculation breakdown.

Now, your resolution specialist will provide you with a copy of sample indirect cost rate breakdowns that we will accept, as well as the inventory list as well for your equipment. Both of those items your resolution specialist will be more than happy to provide you with a sample document that is fairly straightforward and simple in nature.

Moving on to the grantee's assignment of refunds, rebates, and credits. This form is just you certifying that any refunds, rebates, or credits you receive for maybe items that you purchase with grant funds that you were given a discount on you'll be sure to return those funds back to ETA.

The grant closeout tax certification. This form is once again you attesting that all required taxes have been paid and any state or county in which you as the recipient have operated our ETA program.

MERON ASSEFA: I just want to emphasize one thing on the government property for your equipment.

We know you have budgeted equipment with your grant agreement. However, just because you were approved for equipment, that doesn't mean that you can go and buy. You have to have a prior approval. So throughout your life we've been seeing that some grantees haven't requested prior approval and purchase and get disallowed.

So please make sure for all your equipment purchases that you received prior approval from your federal project officer.

MS. MARTIN: And at this point that would have to be very prior. (Chuckles.)

MS. ASSEFA: Thank you.

MR. MALONE: Thank you, Meron. That's a very important point. Again, we want you to navigate through this closeout process with as much ease as possible; and that creates a headache both for you and use. So prior approval is very important. You may move on to the next slide.

MS. MARTIN: OK. Now we're finally through. (Chuckles.)

MR. MALONE: Final quarterly 9130 report. Again, most of you if not all of you should be familiar with this form at this point in time.

At the top of this form in the fourth box to the right we have "final report" and it says "yes" under it. This is because this report has been marked final. When you go in to submit this report you will see two radio buttons that say yes or no. You click on yes and you submit.

Now, another thing I would like to highlight on this particular form is if you look at lines 10, transactions under federal cash – lines 10a and 10b – you have cash receivables or cash and cash disbursements. The amount – again, this is only a sample – the amount is identified as $1,022,000 roughly. If you go down to line 10e, the federal share of expenditures, which you are saying is the total costs you've incurred under this grant, you see $1,200,000.

We understand that there will be a difference more than likely on the final quarterly report because since you're on an accrual basis more than likely you've made an expenditure but you haven't drawn down the funds at this point to pay out to what vendor or source that you incurred those expenses through.

That's not a problem. That's why the closeout report is the final-final (sic) financial report that you will submit. And on that report you'll be able to make that adjustment. I just wanted to note so that you all won't be alarmed. Again, your closeout resolution specialist is more than familiar with all these issues and they'll walk you through them. Next slide, please.

So here is the closeout financial report. Again, it's not much different from what you're seeing with your quarterly financial report. However, again, I would just direct your eyes to line 10a, 10b, and 10e. And on this report you see all three of them match. All three of these line items must be equaled out at the submission of the closeout financial report.

MS. MARTIN: So that means that on September 30 they might be different, but by the time you do the closeout financial report they better be the same.

MR. MALONE: Yes, ma'am. Thank you for that clarity. Correct.

So we just wanted to again present you a visual because a lot of times our grant recipients will have submitted their final financial quarterly report and the resolution specialist will contact them and tell them they haven't submitted the closeout and you'll say, no, we submitted our final financial report. After you submit your final quarterly report, again, there's a final closeout report that you must submit.

MS. MARTIN: And those are pictured side by side here.

MR. MALONE: Yes. OK.

Liquidation of obligations. In closeout, grantees may only liquidate obligations incurred during the period of performance. Again, no expenses for any activities associated with this grant that are incurred after that period of performance end date will be allowed. So please be mindful of that. We'd like to re-emphasize no direct charges for staff time to do work on this closeout process will be allowed after the period of performance end date.

As they stated earlier, indirect costs, if you're charging those to the grant, more than likely – hopefully – you have budgeted for that and thought about so that will be allowed as far as the indirect cost. You may move forward, please.

Compliance, compliance, compliance. That's what closeout is all about. We're sticklers for details and we're going to ensure that everything is in compliance once you leave our shop. So right here we're just giving you an idea that we know there usually are administrative costs that are associated with every award, and DOL tends to put a cap on administrative costs.

Here we have on the screen that there's a 10 percent limitation on administrative costs that may be charged to your award, and I believe that applies to all TAACCCT grantees. So just be mindful if on line 10f we identified that you show more than 10 percent being charged for administrative costs you will be getting notification from your closeout resolution specialist we have a problem.

Budget costs. Also in your grant award you submitted your 424-A and there should be language in there regarding flexibility in grant budget line items.

I'll just mention to be mindful; any 424-A that you submitted and were approved for, salary and wages, fringe benefits, and indirect cost limits, you cannot exceed. However, on some of your other line items there should be some flexibility. I would say that you should consult your grant award agreement. Once again, our closeout staff are very experienced and familiar with these issues on the grantee's detailed statement of costs. And if there is a situation where you overspent you will receive notification.

Budget realignments and closeout. In the event that you do overextend in a particular cost category, we're not so hard in our structure that we won't try to work with you in order to come to a resolution that's both beneficial to yourself and us. However, we'd like to avoid this as much as possible. So during the activity of your grant period, if you see that you may more than likely overrun a limit that you've already been given we would suggest that you go in while the grant is still active and request from your federal project officer another approved realigned budget.

However, in the event that we get to closeout and for whatever reason something fell through the cracks, we will request that you submit a written justification as to why we went over to your federal project officer. You should also include your grant closeout resolution specialist as well. You'll also be required to submit a new Form 424-A identifying the original amount that you were approved for and the revised amount that you are now requesting.

Once you submit that, the federal project officer will review it and determine if it's appropriate. They will then provide us with a copy of that and their recommendation. Again, they can only give a recommendation at the point of closeout, and it will be upon the closeout office to determine whether or not we will approve any budget realignment requests at this point.

So long story short, once again, it would be best to request any budget realignments while your grant is still active. Next slide.

Compliance regarding your indirect costs. Closeout is thorough in the job that we do. We will want to see a copy of your signed indirect cost rate agreement. We will pay close attention to the rate that you have been given for each fiscal year of the indirect cost rate agreement and see how you charged that based on the rate and (the base ?) for that particular year.

Hopefully we won't have any issues here. We know that sometimes individuals are awarded a provisional rate and then later on they may receive a final rate that's not an issue. We here at closeout, we can close out with the provisional rate; or if you come within a timely manner we can also use your final rate to make any adjustments.

Just going back to some of the forms that we touched on earlier. Now, the top box that you see is a copy of the property certification form. There's two section, section 1 and section 2. One is the note that you do have equipment that was purchased with a fair market value of 5,000 (dollars) or greater and a useful life of more than one year; and the other section says that no, we don't have anything that fits that description.

If you do then your resolution specialist will provide you a sample template that is the picture in the bottom right-hand corner, of an inventory list that we will request that you provide us certain other additional information regarding that equipment piece and what you intend to do with that equipment as well, because that will determine what actions will be required on your part.

Submission confirmation letter. This is something you all won't see, but again, this is notification that we received during the closeout process. Once you submit your closeout financial report we get notification, and this is one way that our closeout staff know that you have submitted the required financial report. Again, there's still the closeout package that we have to work on, but these are some of the things that we receive in-house.

Preliminary settlement letter. This is where you want to end up. Preliminary settlement letter means you have successfully navigated the closeout process and your relationship with the government has come to an end. At this time no further action is required by your organization. However, nothing's that easy or that simple; and as always, exceptions to the rule.

On this particular letter it provides you three examples of exceptions to that rule. For example, any cost disallowances stemming from audit or something that arises which determines that the amounts you were paid under award are not all allowable costs, we will come back for our funds.

So just to run through a few misunderstandings. Again, the expenditure amount is higher than what you've drawn down, and normally that occurs on your final quarterly report. As we said, that's why you're allowed the closeout report, to make those final adjustments. So don't get alarmed. Again, communication is key. And if you're concerned about something, reach out to your specialist.

Completing the equipment form correctly. Again, that helps us to determine what steps we need to instruct you on as to what you need to do with any equipment that you've purchased and you have once the grant has come to an end. And in misunderstandings about the forms and documents that need to be submitted, again, our closeout specialists, they're probably some of the best that have ever done it. So if you have any questions, don't hesitate to reach out to them. More often than not, the problems we incur is because of a lack of communication.

Again, common issues which delay closeout.

As I stated just now, not communicating. Refunds may cause there to be a bit of a delay in the closeout process because that involves additional parties like our accounting office getting involved and ensuring that everything is recorded in the proper accounts. Equipment disposition; again, 9130 financial report issues; administrative cost issues; indirect cost issues.

Now if there's a question of disallowed costs, that's usually in regards to audits or determinations based on monitoring findings and things of that nature. And as we stated before, budget realignment. All these issues can delay the closeout process.

Refunds, again, just touching on refunds. We have cited a couple of CFRs which address some of the issues with refunds; letting you know that, again, you still have an obligation and duty to return any funds to DOL as a result of any refunds that you receive. You should do that promptly. And depending on when that refund occurs, it may require the revision of your final closeout expenditure reports.

Last thing to note. We prefer that you return any funds that are due electronically back through the PMS system. However, we understand in some cases that might not be something that's doable and we will take a physical check. Again, that only delays the process.

Frequently asked questions. "Does marking yes on box 6 on the ETA 9130 report trigger the closeout process?" No. The period of performance end date triggers the closeout process.

"The grant ends September 30th. When does the grantee need to submit the final 9130 and the closeout 9130?" Again as we stated, the final quarterly report should be submitted no later than November 14th of this year; and as far as closeout financial 9130 that should be submitted no later than December 30th of this year.

"When is the last time I can draw down funds?" As we stated once again, in regards to the question that was asked earlier, the last day that you should be able to draw down funds without having to request permission through closeout will be the December 30th date, 2017. Again, you should liquidate all of the obligations that you've already incurred within that 90-day period.

"Can standing costs be used to pay disallowed costs?" Yes, but there's more to it than – that's a simple answer. Yes, however if we're going down that road, disallowed costs, that means you've actually had an initial determination and final determination that indicates that you've done something inappropriately. Hopefully we've provided you with enough guidance and information that we don't have to travel down this road. I've heard so many wonderful things about these TAACCCT grantees that I highly doubt that that will be the case. (Chuckles.)

(Crosstalk.)

MS. MARTIN: OK. So let's see. We're first going to take any questions that have to do with what Avery just talked about.

"Can ICR be drawn down in the last six months?" Did you already answer that?

MR. MALONE: That referring to indirect costs?

MS. ASSEFA: Yes. They can.

MS. MARTIN: All right. Another question, "So we will have until" – this is employment data. I'm going to hold on that a minute. Let's see.

19. "Just to verify, we are reporting under the accrual basis? As such, at the end of the period of performance" – and we'll get this question up there in a second here – "we will be accruing the final" –

MS. ASSEFA: Is this salary and fringe benefits costs?

MS. MARTIN: Must be; salary and fringe cost. OK. "And related severance and benefit cost for accrued lead balances as of 9/30/17; is that correct?" And I'm glad you're answering that question and not me; or is that something you need –

MS. ASSEFA: As long as they put it unobligated and advance, would then, yes.

MR. MALONE: We may have to delve deeper into the severance part of the question. That's something we can get back to you on.

MS. MARTIN: Well, OK. So if you have that question and you want a further clarification on that, send it to the TAACCCT mailbox and we will forward to Avery and Meron to handle that question; OK. All right.

"Who will receive the communication about closeout? Is it possible to include additional names to be sure we respond in a timely manner?"

MR. MALONE: Excellent question.

MS. MARTIN: Excellent question. Please answer.

MR. MALONE: In regards to the communication regarding the closeout, it will be the certifying official that you have on record. So if that's outdated and that person has left and you have a new person in place, it would be wise to contact your FPO and reach out to have that updated, because we only send that out to the individuals who are listed as a certifying official. And I believe – actually, I think your FPO will also get a copy as well.

MS. ASSEFA: However, if they want to add more people, please send an email to your FPO so they can forward to us, so that way we can include you in the email.

MS. MARTIN: You could do that?

MS. ASSEFA: Oh, yeah. Most of the time, like he said, we only send it to the certifying – just the person who's completing the form. It might not go –

MS. MARTIN: Yeah. Exactly. And so your certifying official, a lot of times we're seeing college presidents and things of that nature, and you know how busy they are. So you're going to want to check and see who that is. That's one thing you can do right now, check and see who that is for you.

And if it needs to be changed, it actually requires a modification. Not a hard mod to do, but it does required an official modification, at least according to one of our FAQs in here. So you should reach out to your FPO and initiate that modification now so that the right person will be receiving that. And if that person changes on September 30 or September 1 or something, they'll get it figured out. But be in touch with your FPO on that and they can help you with that.

OK. 22, can you answer that one? OK. "Based on my budget forecast I will be close on fringe but will have money left in personnel. Can personnel cover if fringe goes over or is a mod needed for this?"

MS. ASSEFA: A mod is needed. They need – the flexibility doesn't apply for the fringe benefits – for salary and wages and fringe benefits. And we – (inaudible) – separately, even though we do the total. So they need to request ahead of –

MS. MARTIN: OK. So if you know that that is coming close for you, you might want to initiate that mod now or at least before the time of your – as we get closer to closeout.

Somebody else had a question about the term "standing cost." "Does that equate to leveraged resources?"

MS. ASSEFA: Let's get back to that one.

MS. MARTIN: We'll get back to you on that one. OK. So if you have that question about standing cost, please send it to the TAACCCT mailbox, say that it was from the webinar today. We'll put you in touch with the right people here. Also, copy your FPO anytime you do that, please.

We had another question. "We had an initial indirect cost agreement that expired and our new negotiated indirect cost agreement was approximately four percentage points higher. Can we use that latter indirect cost rate?"

MS. ASSEFA: Yes. They have to use the final rate. And if it's over – the calculation comes over the budgeted amount they are entitled as long as they didn't expend the entire grant award.

MS. MARTIN: OK. Just give us a moment here. We're trying to roll through your questions.

MR. MALONE: And they should also reach out to their FPO regarding revising that budget as well.

MS. MARTIN: Number 24. "How long after submission of the closeout package until we receive the preliminary settlement letter?" My guess is it depends. Am I right?

MR. MALONE: Yes, Cheryl. You're absolutely right. It depends on when you submit your documentation; what goes into us having to reconcile and confirm that you have adhered to all terms and conditions of your award, if there's any additional information or clarification that we require.

Again, I think communication is key. The more that we're in constant communication with any issues that may arise will help us to ensure timely and quick closeout.

MS. MARTIN: OK. Thank you. Another question. "Should the prior equipment purchase approval be sent with the equipment list?"

MS. ASSEFA: Actually, the prior approval for the equipment should be in the grant agreement where we have access to go look at. So you don't need to send a letter with a list of the equipment.

MS. MARTIN: OK. Give us a moment here. (Pause.) Hold on here a minute. We're just looking at your questions and we'll get right back with you.

MS. CASERTANO: And just a reminder that a copy of the PowerPoint as well as a transcript and the recording of today's webinar will be made available on WorkforceGPS in about two business days. You can also download the PowerPoint from the file share window on the left. (Pause.)

MS. MARTIN: OK. Another question. "On our budget we broke down line items further, such as contracted benefits, broken down into admissions, tracking, etc. If one of those was going to go over but contracted benefits line is still OK, do I need a mod?"

MS. ASSEFA: No.

MS. MARTIN: As long as it's within that –

MS. ASSEFA: Or within that 20 percent flexibility they have, no. They don't need a mod.

MS. MARTIN: OK. All right. One moment. (Pause.)

All right. Another question. "If an institution didn't have an indirect cost rate at the beginning of the grant award but we do have an indirect cost rate now, can it recover any indirect costs now?"

MR. MALONE: If you've been approved to use that indirect cost rate, meaning that you've submitted it and it's been modded into your grant award, then we will accept that.

MS. ASSEFA: But also you have to submit a revised budget to your FPO for your indirect costs to reflect as one of your budget line items.

MS. MARTIN: OK. All right. I think that that is a lot of the closeout questions. I'm going to go back and see if there are any of the other questions because you guys had a lot of questions, and that's good. That's why we want to do this now. But we've only got a couple minutes left.

One question is, "Please clarify the post-March 31 expenditures language in the FAQ on capacity building and finalizing deliverables, pages 41 and 42." And what I'm going to say about that is all I can tell you is what's on pages 41 and 42 right here on this call.

If you want to ask a more detailed question about that, please send it to your FPO, and if they can't answer it they'll send it to the TAACCCT mailbox and then we'll go from there.

OK. Just one moment. We'll try to take a couple more questions but give us a second here. (Pause.)

So we're going to answer this question about there seems to be inconsistency in whether salary can continue to be paid after March 31 for those employees working toward data gathering and interpreting for final reporting.

Yes, I'm sure there's confusion about this because TAACCCT grants are special in so many ways, right? I think they're the only grants that have this special thing about "grant-funded program activities." If you are doing things like you say right there in this question – employees that are working toward data gathering and interpreting for the final reporting, yes. Those salaries can be covered between April 1 and September 30, 2017.

If you're a professor preparing a class, if you are a navigator coaching students, those expenses cannot be paid after March 31. Those are grant-funded program activities. Then there are these follow-up activities and so forth. So the ones that you said right here could be paid after that.

If you have more questions about this whole business, though, please do ask your FPO and you can copy the TAACCCT mailbox on that, because it just gets to be a little bit detailed.

Our last question, "If our personnel costs increase, can we increase our indirect budget with a mod?"

MS. ASSEFA: Yes, because when personnel costs increase usually indirect costs include personnel. So yes. But you have to request and submit a budget.

MS. MARTIN: OK. And does that have to happen before closeout?

MS. ASSEFA: Yes, before closeout. If it doesn't happen we still work with those grantees and do some retroactive budgetary alignment.

MS. MARTIN: But it's much better – much, much, much better – to take care of it before then, because you do not want to be on that list of special grantees that have special challenges afterwards. I mean, if you are, we'll work with you. But for everybody, it will be easier.

OK. I'm going to say that if you did not get your question answered here – and I think we tried to get most of your questions – if you did not get it answered please reach out to your FPO. And if you want to you can send it to the TAACCCT mailbox and copy your FPO and we will all get back to you after this.

So thank you very much for your time. Thank you for joining us today. Thank you for being ahead of the curve and on top of things now because there are indeed a lot of things to think about between now and September 30 and shortly after that.

So I'm going to turn it back over to you, Laura, and again, thank you all for joining us.

(END)