Fiscal and Performance Training Forums 2011

U. S. Department of Labor

Education and Training Administration

Fiscal and Performance Training Forums 2011

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FFATA

DEPARTMENT OF LABOR
Employment and
Training Administration

Federal Funding Accountability & Transparency Act (FFATA)

- Subaward & Executive Compensation Requirements and Reporting

Agenda

- What is FFATA?
- Review reporting requirements
  - Who?
  - What?
  - When?
  - Exclusions?
- The Reporting System – FSRS
  - Database registrations
  - FSRS and system overview

What is FFATA?

- Federal Funding Accountability and Transparency Act
- Legislation enacted September 26, 2006
- Requires
  - Prime recipients (receiving Federal funding through Federal awards)
    - threshold of $25,000
    - reporting of subawards
    - reporting of executive compensation
  - Establishment of a single, searchable website

FSRS

- Federal Subrecipient Reporting System
- Separate reports
  - Subawards
  - Executive Compensation
- System operated and managed by GSA
  - NOT an ETA reporting system
  - Data uploaded into USASpending.gov

Guidance

- OMB
  - 2 CFR Part 170 – September 14, 2010
  - Federal guidance –
    - Memorandum to Agencies
    - August 27th and October 28th
- ETA
  - TEGL
  - FFATA mailbox
  - specific questions

Who is Responsible for Reporting?

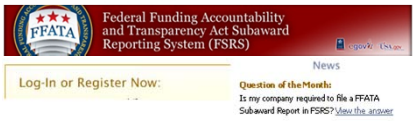
- Federal prime recipients
  - awards October 1, 2010, or later
  - report subaward and executive compensation information into FSRS (www.fsrs.gov)
- ETA reports prime recipient award information to pre-populate certain information

No Report Required

- Recovery Act/ARRA funded awards
- Awards less than $25,000
- New awards with October 1 or later effective date
  - Subject to requirements
  - Additional funding increments do not trigger requirement
  - OMB guidance on incremental funding

When Did Reporting Begin?

- The FSRS started accepting subaward reports on October 29, 2010
- Federal prime recipients must register at www.fsrs.gov



When Must You Report?

- By the end of the month following the month after the subaward or obligation was made
- Example:
  - For a grant awarded on October 2, 2010, the prime recipient would have until November 30, 2010, to report the sub-award and executive compensation information
  - for a grant awarded on October 31, 2010, the prime recipient would have until November 30, 2010, to report the sub-award and executive compensation information

Where Else Must You Register?

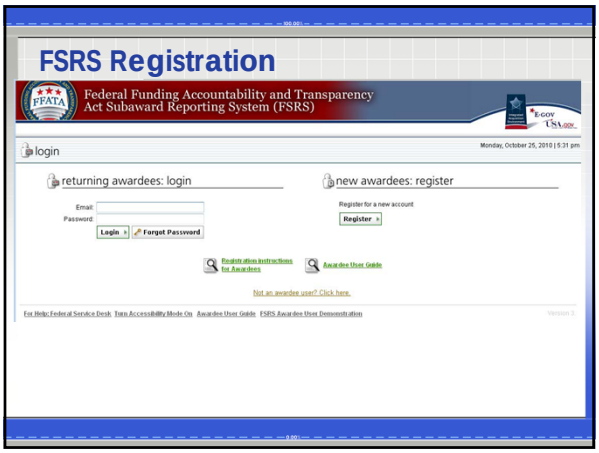
- BEFORE you submit a report
- Dun and Bradstreet, Data Universal Numbering System (DUNS)
  - (www.dnb.com)
- Central Contractor Registration (CCR)
  - (www.ccr.gov)

What is FSRS? (www.fsrs.gov)

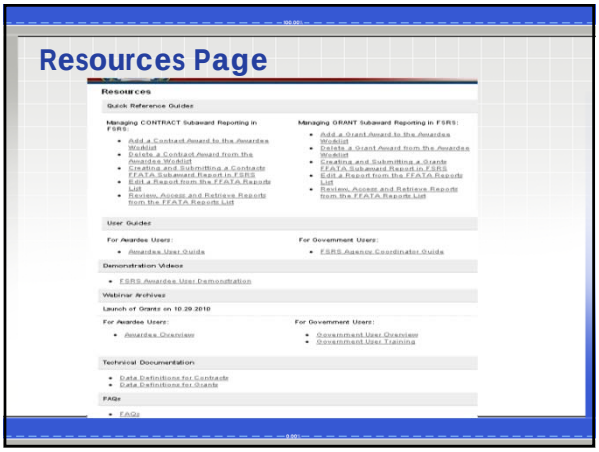
- FSRS is an electronic database
- Used by prime recipients to input subaward and executive compensation information.
- Maintained by GPO

Log-In New Users

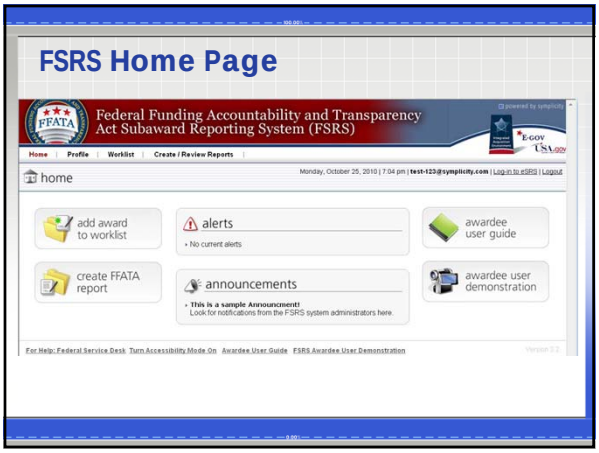
FSRS Registration



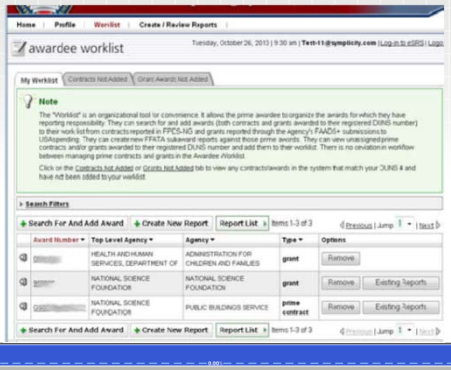
Resources Page



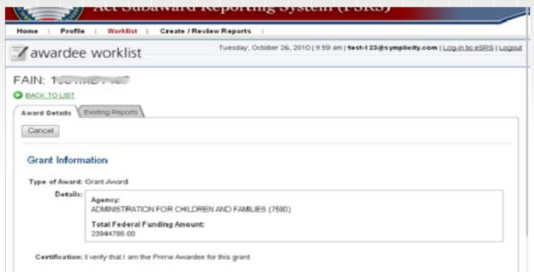
FSRS Home Page



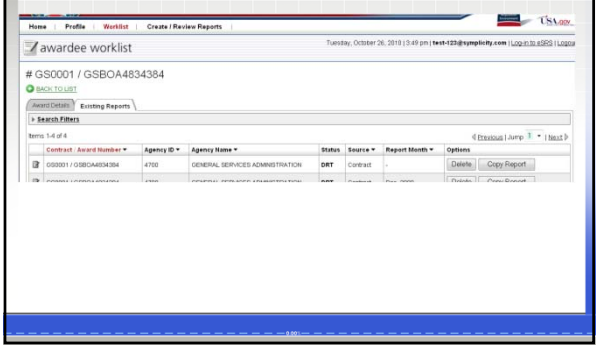
The Worklist



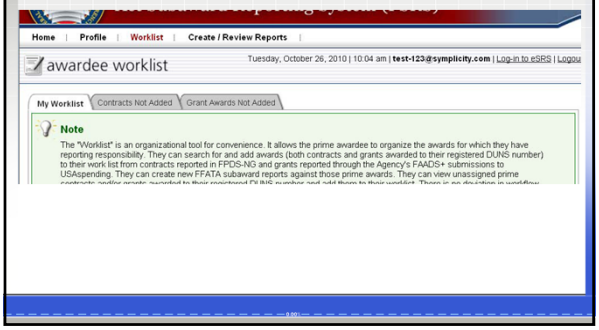
Award Details



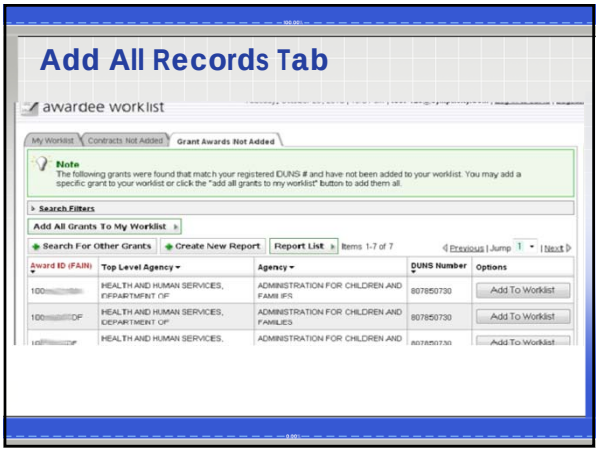
Existing Reports Tab



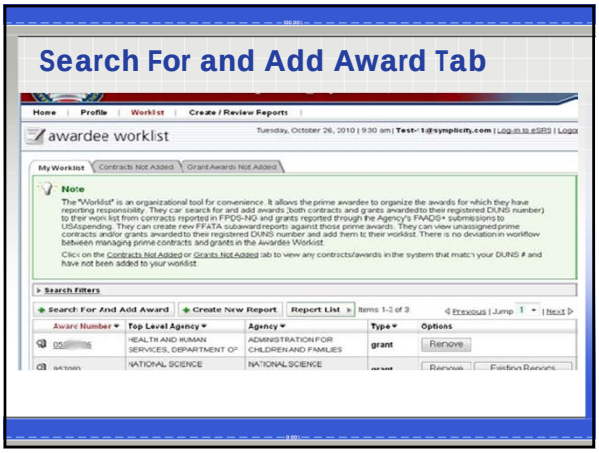
Finding Awards Not Added to the Worklist



Add All Records Tab



Search For and Add Award Tab



How to Initiate a Search

Home | Profile | Worklist | Create / Review Reports

awardee worklist

Tuesday, October 26, 2010 | 9:53 am | Test-11@symplicity.com | Log-in to eSRS | Logout

Enter Contract / Grant #

Note:

Note: If you are unable to find or report against a prime award that should be available through FSRS, please take the following action:

- Prime Contract Awardees -- Contact your cognizant contracting officer or official for help. In order for you to file a FFATA subaward report against your contract, your government contracting authority will have to report your record to Federal Procurement Data System -Next Generation (FPDS-NG). FPDS-NG is the authoritative source of the basic contractual information used to pre-populate many of the FSRS fields when entering your Contract Number. For more information on FPDS-NG please visit https://www.fpds.gov
- Prime Grant Awardees -- Contact your grant making official for help. In order for you to file a FFATA subaward report against your grant, your Federal grant making official must report your prime grant award information through their FAADS+ file submission to USAspending. The Agency's FAADS+ submission is the authoritative source for the basic grant award information used to pre-populate many of the prime award details in your FFATA report. For more information on the FAADS+ format, please read OMB M-09-19

Submit | Cancel

Contract / Grant Request Form (Step 1)

* indicates a required field

Type of Award: Contract/Order Grant

Award ID (FAIN)*: Please enter the Federal Award ID (FAIN) you would like to add to your worklist as it appears on your grant award notice

Grant Award Summary

View Grant Award Summary

Please confirm that the following is the grant that you intend on reporting against. If this is the correct grant, click [continue]. Otherwise, click [select another grant] to choose another grant or start over.

Select Another Grant | Continue

Award Summary

Federal Award #: 100[redacted]NF

Agency: ADMINISTRATION FOR CHILDREN AND FAMILIES (7590)

Total Federal Funding Amount: 102442829.00

Select Another Grant | Continue

Warning Error for Non-FFATA Awards

View Contract Summary

Errors Detected

- The selected contract or order does not require FFATA subaward reporting. FFATA subaward reports are only required for contracts or orders awarded by the federal government January 01, 2009 or later at certain dollar thresholds.

Select Another Contract

Cancel

Step 1)

* indicates a required field

Prime Recipient Verification

Home | Profile | Worklist | Create / Review Reports

awardee worklist

Tuesday, October 26, 2010 | 3:28 pm | test-44@symplicity.com | Log in to eS

Note: This contract was previously on your worklist. Please click submit to add this contract back onto your worklist.

Submit Cancel

Contract Request Form (Step 2)

* indicates a required field

Type of Award: Contract

Certification*: The FFATA Report can only be submitted by prime contractors. Only continue with this submission if you are the prime contractor for this contract

I verify that I am the Prime Contractor for this contract

Submit Cancel

Prime Contract Info

Number	AG3K15C10032C
Agency	AGRICULTURAL RESEARCH SER
Current Contract Value	$ 34457024.00

Removing Awards from the Worklist

awardee worklist

Tuesday, October 26, 2010 | 3:42 pm | test-123@symplicity.com | Log in to eSRS | Logo

My Worklist | Contracts Not Added | Grant Awards Not Added

Note

The "Worklist" is an organizational tool for convenience. It allows the prime awardee to organize the awards for which they have reporting responsibility. They can search for and add awards (both contracts and grants awarded to their registered DUNS number) to their work list from contracts reported in FPDS-NG and grants reported through the Agency's FAADS+ submissions to USAspending. They can create new FFATA subaward reports against those prime awards. They can view unassigned prime contracts and/or grants awarded to their registered DUNS number and add them to their worklist. There is no deviation in workflow between managing prime contracts and grants in the Awardee Worklist.

Click on the Contracts Not Added or Grants Not Added tab to view any contracts/awards in the system that match your DUNS # and have not been added to your worklist.

Search Filters

Search For And Add Award | Create New Report: | Report List | Items 1-4 of 4

Previous | Jump 1 | Next

Award Number	Top Level Agency	Agency	Type	Options
1011MRI	HEALTH AND HUMAN SERVICES, DEPARTMENT OF	ADMINISTRATION FOR CHILDREN AND FAMILIES	grant	Remove Existing Reports
1012[illegible]HF	HEALTH AND HUMAN SERVICES, DEPARTMENT OF	ADMINISTRATION FOR CHILDREN AND FAMILIES	grant	Remove Existing Reports
1020[illegible]04	HEALTH AND HUMAN SERVICES, DEPARTMENT OF	ADMINISTRATION FOR CHILDREN AND FAMILIES	grant	Remove
GS00[illegible] / GSO[illegible]	GENERAL SERVICES ADMINISTRATION	GENERAL SERVICES ADMINISTRATION	prime contract - task order	Remove Existing Reports

Search For And Add Award | Create New Report: | Report List | Items 1-4 of 4

Previous | Jump 1 | Next

FFATA Reports Status

Home | Profile | Worklist | Create / Review Reports

USA.gov

FFATA reports

Tuesday, October 26, 2010 | 3:56 pm | test-123@symplicity.com | Log in to eSRS | Logo

All | Drafts | Submitted | Re-opened

Search Filters

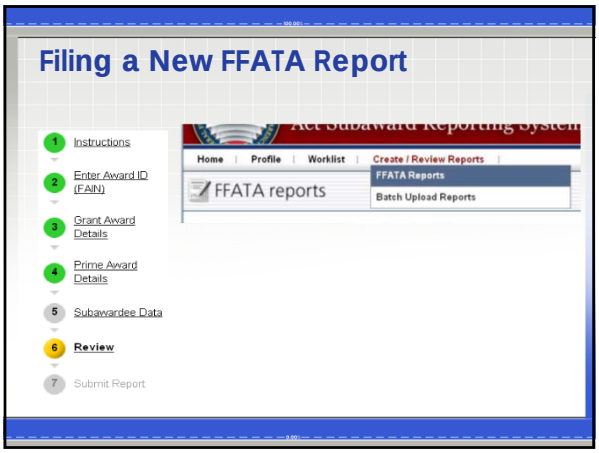
Create New Report | Items 1-10 of 10

Previous | Jump 1 | Next

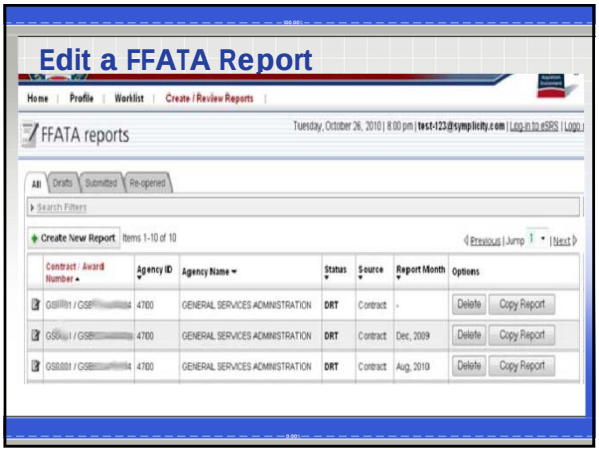
Contract / Award Number	Agency ID	Agency Name	Status	Source	Report Month	Options
1001MD1407	7590	ADMINISTRATION FOR CHILDREN AND FAMILIES	DRT	Grant	-	Delete Copy Report
1001MD1407	7590	ADMINISTRATION FOR CHILDREN AND FAMILIES	DRT	Grant	-	Delete Copy Report
1001MD1407	7590	ADMINISTRATION FOR CHILDREN AND FAMILIES	DRT	Grant	-	Delete Copy Report
1001MD1407	7590	ADMINISTRATION FOR CHILDREN AND FAMILIES	DRT	Grant	Oct, 2010	Delete Copy Report
1001MD1407	7590	ADMINISTRATION FOR CHILDREN AND FAMILIES	DRT	Grant	Oct, 2010	Delete Copy Report
1002MNTANF	7590	ADMINISTRATION FOR CHILDREN AND FAMILIES	DRT	Grant	Apr, 2010	Delete Copy Report
GS0001 / GSBOA4834384	4700	GENERAL SERVICES ADMINISTRATION	DRT	Contract	-	Delete Copy Report
GS0001 / GSBOA4834384	4700	GENERAL SERVICES ADMINISTRATION	DRT	Contract	Dec, 2009	Delete Copy Report

DRT = Draft | SUB = Submitted | RPN = Reopened

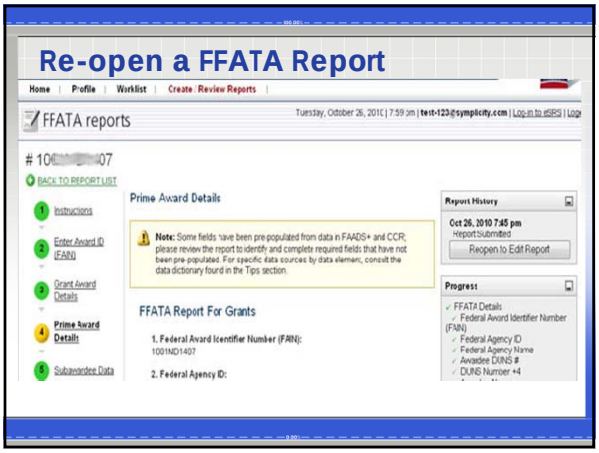
Filing a New FFATA Report



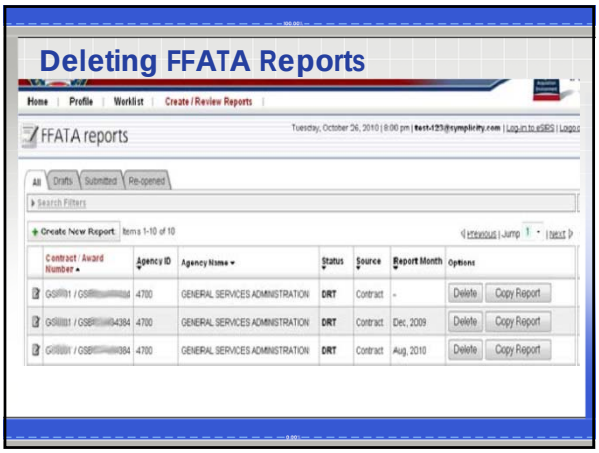
Edit a FFATA Report



Re-open a FFATA Report



Deleting FFATA Reports



Batch Report Navigation Menu

Questions?

- Office of Grants Management
  - Division of Policy, Review & Resolution
  - ffata.reporting@dol.gov
- OMB's website for Federal Spending Transparency
  - www.whitehouse.gov/omb/open
- FFATA Sub-award Reporting System
  - www.fsrs.gov

Financial Reporting (ETA 9130)

The ETA 9130

Form and Instructions

Learning Objectives

- Describe general reporting requirements
- Identify specific items that are reported on the ETA 9130
- List 5 elements in ETA 9130 instructions
- Avoid common reporting mistakes

Why is this workshop important?

- Clarify reporting requirements
- Improve report integrity and reliability
- Enhance ability to manage grant funds
- Maximize available resources

Basic Requirements

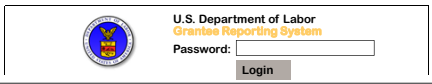
- DOL Regulations
  - 29 CFR 97.41
  - 29 CFR 95.52
- Grant Agreement Specifications
- Relevant legislation/program specific requirements
  - INAP, Older Worker, YouthBuild

ETA-9130 Reporting Basics

- BASIS - Accrual
- FREQUENCY – Quarterly
- DUE – 45 Days after quarter end for ALL ETA Programs
- Submitted by prime grant recipient via online reporting system

E-grants: Online Reporting System

- Password and Pin Required
  - Contact: Shantay Logan logan.shantay@dol.gov
- For technical issues contact helpdesk: e-grants.help@dol.gov or (202) 693-2682
- Access to all reports by sub accounts



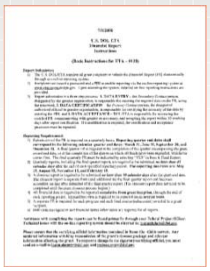
Modifying Reports

- Access to reports
  - Before accepted by DOL
  - After accepted by DOL
    - Remarks
    - Recertify
    - E-mail FPO
- Locked Reports

True or False

- After a quarterly report has been locked it can be unlocked by your FPO.
- If you use a cash-based system of accounting, you will need to change your system in order to report accruals on the ETA-9130.

The ETA 9130 Reporting Instructions



ETA 9130 Reporting Instructions

5 Elements

1. Line data description
   - Narrative that describes expected data to be reported on line
2. Hard edit
   - Provides the rule for data on line. Error will occur if rule is not followed

Five Elements in Reporting Instructions (cont.)

3. Soft Edit
   - Provides rules that generally apply to data on line. Error is not received for data that does not comply with rule.
4. Caution
   - Accompany Soft Edits. If data does not comply with general rule stated as Soft Edit, explanation is required in remarks section

Five Elements in Reporting Instructions (cont.)

5. Note
   - Provides additional information to consider if uncertain about data required for line.

The ETA 9130 Reporting Form

The 9130-Identifying Information

- Items 1-9
  - Background/general information
  - Majority of information is pre-entered
  - Check for accuracy
    - Subaccount number
    - Grant number
  - Final report?
    - Grant expired
    - Funds fully expended

Item 10: Transactions

- 4 major sections:
  - Federal Cash
  - Federal Expenditures and Unobligated Balance
  - Recipient Share
  - Program Income

Federal Cash

- 10a: Cash Receipts
  - What did you draw down from the PMS?
- 10b: Cash Disbursements
  - What cash has been paid out?
- 10c: Cash on Hand
  - Excess cash requirements apply

Federal Cash:	(DOL records reflect quarter end cumulative drawdowns of $ .00)		
a. Cash Receipts	0.00	0.00	0.00
b. Cash Disbursements	0.00	0.00	0.00
c. Cash on Hand (line a minus b)	0.00	0.00	0.00

Non-WIA Formula Programs

- Data Pre-Entered
  - Basic 9130
  - INAP
  - Older Worker
  - NFJP
  - ES and UI

- Quarter-end PMS drawdown records

WIA Formula Programs

- Data required to be entered
  - WIA formula funded grants
- Quarter-end PMS drawdown records =total drawn from each subaccount.
  - Total PMS drawdown by subaccount
    - Statewide + Local DW + Statewide Rapid Response
    - Same for Adult and Youth programs

Things to Keep in Mind

- Refers to FEDERAL cash only
- Attention to detail is important
- What happens if the Federal drawdown doesn't match your records?

True or False

- The reporting quarter ends on Thursday. You initiated a draw down on Tuesday because payroll is processed on Friday. You should not report the funds drawn down on Tuesday because it will appear that you have excess cash on hand.
- You can draw funds from multiple accounts via PMS to pay for costs associated with multiple grants as long as you track draw amounts and disbursements accurately.

Federal Expenditures and Unobligated Balance

- Lines 10d through 10i
- Begins with funds available for expenditure
- Expenditures
- Unliquidated obligations
- Total Federal obligations
- Amount available for other uses

Federal Expenditures and Unobligated Balance

d. Total Federal funds authorized			
e. Federal share of expenditures	0.00	0.00	0.00
f. Total administrative expenditures	0.00	0.00	0.00
g. Federal share of unliquidated obligations			0.00
h. Total Federal obligations (sum of lines e and g)			0.00
i. Unobligated balance of Federal funds (line d minus h)			0.00

Federal Expenditures and Unobligated Balance

- Line 10d: Total Federal funds authorized
  - All grants except WIA Formula funded grants.
    - Pre-entered Data
    - Amount agrees with award amount from grant award document

Federal Expenditures and Unobligated Balance

- Line 10d: Total Federal funds authorized
  - WIA Formula funded grants.
    - Data required to be entered.
    - Data based on funding stream
    - For Statewide funds: Total amount of funds by funding stream retained at state level for statewide activities
    - For Local Funds: Total amount of funds by funding stream allocated to local area for local area activities

Federal Expenditures and Unobligated Balance

- Line 10e – 10g
  - Accrued expenditures is captured
  - Administrative costs are broken out
  - Unliquidated obligations
- Lines 10h – 10i
  - Automatic Calculations
  - Total Federal Obligations
  - Unobligated Balance

Observations

- Reported obligations tied to disbursements.
- Budget categories are reported as obligations.
- State reports local allocations as obligations.

Recipient Share

- Match and Leveraged Resources

Recipient Share:			
j. Total recipient share required	0.00	0.00	0.00
k. Recipient share of expenditures	0.00	0.00	0.00
l. Recipient share of unliquidated obligations	0.00	0.00	0.00
m. Total recipient obligations (sum of lines k and l)	0.00	0.00	0.00
n. Remaining recipient share to be provided (line j minus m)	0.00	0.00	0.00

Recipient Share

- Line 10j Total Recipient Share
  - Match requirement
- Line 10k Recipient Share of Expenditures
  - Report leveraged resources regardless of whether match is required
- Lines 10l-10n
  - Lines allow for reporting of leveraged resources in similar way as data in Federal expenditures section on form.

Observations

- Grantee does not report leveraged resources because there is no match requirement associated with the grant.
- In-kind contributions are not supported by documentation.
- Grantee would like to use stand-in costs to address disallowed costs, but did not report leveraged resources over the life of the grant.

Program Income

- 10.o. Total Fed. Program Income Earned
  - Production of curriculum
  - Sale of products to non-Federal organizations
- 10.p. Program Income Expended
- 10.q. Unexpended Program Income

Program income:			
o. Total Federal program income earned	0.00	0.00	0.00
p. Program income expended in accordance with the addition method	0.00	0.00	0.00
q. Unexpended program income (line o minus line p)	0.00	0.00	0.00

Program Income

- ADDITION – for all ETA programs
  - Used to further eligible program objectives
- Must be earned as result of allowable grant activity
- Expended by the end of the grant

Accounting for Program Income

- NET – Line 10.o. reflects total PI earned minus costs incident to generating it
  - No cost reported on line 10.e.
- GROSS – Line 10.o. reflects 100% of PI earned
  - Costs incident to generating it were charged to the grant on line 10.e.

Observations

- States do not report program income earned and expended at local area.
- Grantee does not disburse program income cash before it draws down funds from PMS.

True or False

- There are no restrictions regarding the expenditure of program income earned during the life of the grant.
- Cost of meeting space is being paid by three grants. Program income earned as a result of rental of meeting space should be allocated to the three grants that are paying for the space.

Item 11: Additional Expenditure Data Required

- 11a: Other Federal funds expended
  - Found on all reporting forms
- 11b-11e: Required items vary by program

Other Federal funds Expended
Real property proceeds expended
Recaptured funds expended
Expenditures of Adult funds transferred to DW Program
Employment Services Expenditures
In-School Youth Expenditures
Enrollee Wages and Fringe Benefits

Additional Expenditure Data Required

ETA 9130 Basic

- 11.a. Other Federal Funds Expended
  - Leveraged Resources

11. Additional expenditure data required
a. Other Federal funds expended

Additional Expenditure Data Required

Indian and Native American Program

- a. Other Federal funds expended
- b. Employment services expenditures
- c. Training services expenditures
- d. Other program services expenditures

11. Additional Expenditure Data Required
a. Other Federal funds expended
b. Employment services expenditures
c. Training services expenditures
d. Other program services expenditures

Additional Expenditure Data Required

National Farmworker Job Program

- a. Other Federal funds expended
- b. Related assistance expenditures
- c. Other program services expenditures

11. Additional Expenditure Data Required
a. Other Federal funds expended
b. Related assistance expenditures
c. Other program services expenditures

Additional Expenditure Data Required

Older Worker Program

- a. Other Federal funds expended
- b. Administration - Headquarters
- c. Administration - Local
- d. Enrollee wages and fringe benefits
- e. Other enrollee expenditures

11. Additional Expenditure Data Required
a. Other Federal funds expended
b. Administration - Headquarters
c. Administration - Local
d. Enrollee wages and fringe benefits
e. Other enrollee expenditures

Additional Expenditure Data Required

WIA Statewide Youth, Adult, Dislocated Worker

- a. Other Federal funds expended
- b. Real property proceeds expended
- c. Recaptured funds expended

11. Additional Expenditure Data Required
a. Other Federal funds expended
b. Real property proceeds expended
c. Recaptured funds expended

Additional Expenditure Data Required

Statewide Rapid Response, Employment Services and Unemployment Insurance

- a. Other Federal funds expended
- b. Real property proceeds expended

11. Additional Expenditure Data Required
a. Other Federal funds expended
b. Real property proceeds expended

Additional Expenditure Data Required

WIA Local Youth

- a. Other Federal funds expended
- b. Real property proceeds expended
- c. Out of school youth expenditures
- d. In school youth expenditures
- e. Summer employment opportunities expenditures

11. Additional Expenditure Data Required
a. Other Federal funds expended
b. Real property proceeds expended
c. Out of school youth expenditures
d. In school youth expenditures
e. Summer employment opportunities expenditures

Additional Expenditure Data Required

WIA Local Adult

- a. Other Federal funds expended
- b. Real property proceeds expended
- c. Expenditure of Adult funds transferred to DW Program

11. Additional Expenditure Data Required
a. Other Federal funds expended
b. Real property proceeds expended
c. Expenditure of Adult funds transferred to DW Program

Additional Expenditure Data Required

WIA Local Dislocated Worker

- a. Other Federal funds expended
- b. Real property proceeds expended
- c. Expenditure of DW Funds transferred to Adult Program

11. Additional Expenditure Data Required
a. Other Federal funds expended
b. Real property proceeds expended
c. Expenditure of DW Funds transferred to Adult Program

Item: Remarks and Certification

- 12. Remarks
  - Explanations regarding data
- 13 a-e. Certification:
  - Certify accuracy of the report
  - Confirm grantee contact information

12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:	
13. Certification: I certify to the best of my knowledge and belief that this report is correct and complete and that all expenditures and unliquidated obligations are for the purposes set forth in the award documents.	
a. Typed or Printed Name and Title of Authorized Certifying Official	c. Telephone (Area code, number and extension)
	d. Email address
b. Signature of Authorized Certifying Official	e. Date Report Submitted (Month, Day, Year)

Accuracy is Critical

- Incomplete or erroneous data and/or late submittal of reports impacts ETA's financial credibility
- Further funding for ETA programs is contingent upon expending this year's funds this year

Have Questions?

- **Initial Contact – Federal Project Officer**
- **Online Training Modules**
  www.workforce3One.org

Handout- ETA 9130 Forms and Instruction

(To be used by Grantees previously reporting on the SF-269 - unmodified)

U.S. DOL ETA FINANCIAL REPORT

(Follow instructions on the back)

1. Federal Agency and Organizational Element to Which Report is Submitted	2. Federal Grant or Other Identifying Number Assigned by DOL	OMB Approval No 1205-0461 Expires 11/30/2009
3. Recipient Organization (Name and complete address including Zip code)		

4a. DUNS Number	4b. EIN	5. Recipient Account Number or Identifying Number	6. Final Report	7. Basis of Accounting
			☐ Yes ☐ No	☐ Accrual

8. Project/Grant Period From: (Month, Day, Year)	To: (Month, Day, Year)	9. Reporting Period End Date (Month, Day, Year)

10. **Transactions**	Cumulative
Federal Cash :	
a. Cash Receipts	
b. Cash Disbursements	
c. Cash on Hand (line a minus b)	
Federal Expenditures and Unobligated Balance:	
d. Total Federal funds authorized	
e. Federal share of expenditures	
f. Total administrative expenditures	
g. Federal share of unliquidated obligations	
h. Total Federal obligations (sum of lines e and g)	
i. Unobligated balance of Federal funds (line d minus h)	
Recipient Share:	
j. Total recipient share required	
k. Recipient share of expenditures	
l. Recipient share of unliquidated obligations	
m. Total recipient obligations (sum of lines k and l)	
n. Remaining recipient share to be provided (line j minus m)	
Program Income:	
o. Total Federal program income earned	
p. Program income expended in accordance with the addition method	
q. Unexpended program income (line o minus line p)	
11. **Additional expenditure data required**	
a. Other Federal funds expended	

12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:

13. Certification: I certify to the best of my knowledge and belief that this report is correct and complete and that all expenditures and unliquidated obligations are for the purposes set forth in the award documents.

a. Typed or Printed Name and Title of Authorized Certifying Official	c. Telephone (Area code, number and extension)
	d. Email address
b. Signature of Authorized Certifying Official	e. Date Report Submitted (Month, Day, Year)
	14. Agency use only:

Prescribed by OMB A-102 and A-110

Public reporting burden for this collection of information is estimated to average 30 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (1205-0NEW), Washington, DC 20503.

ETA-9130

7/8/2008

U.S. DOL ETA
Financial Report
Instructions

(Basic Instructions for ETA – 9130)

Report Submission

1) The U.S. DOL/ETA requires all grant recipients to submit the Financial Report (FR) electronically through an on-line reporting system.
2) Recipients are issued a password and a PIN to enable reporting via the on-line reporting system at www.etareports.doleta.gov. Upon accessing the system, detailed on-line reporting instructions are provided.
3) Report submission is a three step process: **1. DATA ENTRY** – the *Secondary Contact* person, designated by the grantee organization, is responsible for entering the required data on the FR, using the password; **2. DATA CERTIFICATION** – the *Primary Contact* person, the designated authorized official in grantee organization, is responsible for certifying the accuracy of the data by entering the PIN; and **3. DATA ACCEPTANCE** – DOL/ETA is responsible for reviewing the certified FR, communicating with grantee as necessary, and accepting the report within 10 working days after report certification. If a modification is required, the certification and acceptance processes must be repeated.

Reporting Requirements

1) Submission of the FR is required on a quarterly basis. **Reporting quarter end dates shall correspond to the following calendar quarter end dates: March 31, June 30, September 30, and December 31**. A final quarter FR is required at the completion of the quarter encompassing the grant award end date, or at the completion of the quarter in which all funds have been expended, whichever comes first. The final quarterly FR must be indicated by selecting "YES" in Item 6, Final Report.
2) Quarterly reports, including the final quarter report, are required to be submitted ***no later than 45 calendar days*** after the end of each specified reporting period. **The reporting due dates are: May 15, August 15, November 15, and February 15.**
3) A closeout report is required to be submitted ***no later than 90 calendar days*** after the grant end date. The closeout report is separate from (and additional to) the final quarter report and becomes accessible on-line after submittal of the final quarter report. (The closeout report does not need to be completed until the grant closeout process begins.)
4) All financial data is required to be reported **cumulative from grant inception**, through the end of each reporting period. Expenditure data is required to be reported on an **accrual basis**.
5) A separate FR is required for each program and each fund source (subaccount) awarded to a grant recipient.
6) Both cash management and financial status information are required for all reports.

Assistance with completing the reports can be found primarily through your Federal Project Officer. Technical issues with the on-line reporting system should be directed to: e-grants.help@dol.gov.

Please ensure that the certifying official information contained in Items 13a -13d is correct. Any outdated information will delay transmission of the grant's closeout package and relevant information affecting the grant. To request a change in the signatory/certifying official, you must send an e-mail to logan.shantay@dol.gov and malone.avery@dol.gov.

Line Item Instructions for the U.S. DOL ETA Financial Report

FFR Number	Reporting Item	Instructions
Cover Information		
1	Federal Agency and Organizational Element to Which Report is Submitted	"U.S. Department of Labor Employment & Training Administration." PRE-ENTERED
2	Federal Grant or Other Identifying Number Assigned by Federal Agency	Grant number assigned for the award by DOL/ETA **and contained on the grant award document.** PRE-ENTERED
3	Recipient Organization	Name and complete address of recipient organization PRE-ENTERED
4a	DUNS Number	Recipient organization's Data Universal Numbering System (DUNS) number or Central Contract Registry extended DUNS number. PRE-ENTERED
4b	EIN	Recipient organization's Employer Identification Number (EIN). PRE-ENTERED
5	Recipient Account Number or Identifying Number	Enter the account number or any other identifying number assigned by the recipient to the grant award. **This number is strictly for the recipient's use only and is not required by DOL/ETA**.
6	Final Report (Yes/No)	Select appropriate box. Check "Yes" only if this is the final quarter report for subject grant subaccount. For grants with multiple subaccounts, each subaccount may be indicated "final" at the time all funds in that subaccount are expended. However, the grant closeout will not occur until after the grant end date
7	Basis of Accounting (Accrual)	Basis of Accounting is intended to read and be interpreted as **"Basis of Reporting".** **ACCRUAL** has been pre-entered on all reporting formats. **DOL/ETA regulations require that all recipients report expenditures and program income on an accrual basis**. For accrual basis reporting, accrued expenditures are recorded when a requirement to pay is established. **Note**: Recipients are not required to change their accounting systems to accommodate DOL/ETA requirements that differ from their underlying accounting practices. Instead, recipients must furnish the required accrual information based on available documentation and best estimates.
8	Project/Grant Period, From: (Month, Day, Year)	The beginning date of the grant award as defined in the grant award document. PRE-ENTERED
	Project/Grant Period ,To:	The ending date of the grant award as defined in the grant award

FFR Number	Reporting Item	Instructions
	(Month, Day, Year)	document, and the final date for which any **accrued expenditures** can be incurred under subject grant award. PRE-ENTERED.
9	Reporting Period End Date: (Month, Day, Year)	The last date of the quarter for which cumulative data is provided on subject FR. (Required reporting quarter end dates are contained in "Reporting Requirements" in first section of these instructions.) PRE-ENTERED
10	**Transactions** Enter cumulative amounts in the **Cumulative Column** for each line item requiring data entry, as of the reporting period end date. **NOTE: If any line item does NOT require data entry for a particular grant/program, a ZERO must be entered**. Line items which will be automatically calculated are grayed out, and no data entry will be permitted by reporting entity. Cumulative data for current reporting quarter will become **Previous Period Column** in following quarter. **This Period** data will be automatically calculated. Use Section 12, Remarks, to provide any information deemed necessary to support/explain data provided in this section.	
Federal Cash		
10a	:	This amount will be **PRE-ENTERED** to agree with DOL cumulative quarter-end drawdown records associated with this grant and the specific subaccount identified in Item 2. This amount should coincide with cumulative PMS drawdowns actually received in grantee's bank account, as of the last working day of the quarter. *Drawdowns **initiated** on the last business day of a quarter will **NOT** be reflected in this amount, but in the subsequent quarter's cash receipts.* **{This amount will be the same as the amount posted in the note above Item 10a which reads "(DOL records reflect total quarter-end cumulative drawdowns of $_____)."}** ***NOTE: For grant recipients operating on a reimbursement basis, this amount will NOT reflect cash utilized from other fund sources of the grantee organization to pay for subject grant activities, until such funds are drawn down under the subaccount specifically associated with this grant as identified in Item 2.*** ***HARD EDIT - Line*** 10a cannot exceed Line 10d
10b	Cash Disbursements	Enter the cumulative amount of **cash disbursed from the cash receipts identified on 10a,** as of the reporting period end date. The cash disbursements reported must be "all or a portion of" the cash receipts reflected on Item 10a. This entry should reflect the sum of actual cash disbursements for direct charges for goods and services, the amount of cash paid out for indirect expenses charged to the award, and the amount of cash advances and payments made to subrecipients and subcontractors.

FFR Number	Reporting Item	Instructions
		HARD EDIT - Line 10b cannot exceed Line 10a. SOFT EDIT - Line 10b should not exceed Line 10e. CAUTION: Line 10e will typically be greater than Line 10b due to the inclusion of accruals, for which payment has not been made. If allowable advances made to sub-entities, cause Line 10b to exceed Line 10e, a valid explanation should be provided in Item 12, Remarks. SOFT EDIT - Line 10b for "This Period" should not be negative. CAUTION: If entry for this line item is less than previous period cumulative amount, a valid explanation should be provided in Item 12, Remarks.
10c	Cash On Hand (Line 10a minus Line 10b)	This is an automatic calculation, which is Line 10a minus Line 10b. The cash on hand amount should represent immediate cash needs. If any drawdowns were made prematurely, or there are other reasons for any excess cash on hand, an explanation should be provided in Section 12, Remarks. HARD EDIT - Line 10c must be equal to Line 10a minus Line 10b HARD EDIT - Line 10c cannot be negative.
Federal Expenditures and Unobligated Balance:		
10d	Total Federal Funds Authorized	This amount is pre-entered for all grants except WIA formula-funded. This entry should agree with the grant award amount specified in the official grant award document for this subaccount, as identified in Item 2. (Discrepancies must be identified by grantee and corrected, as necessary, by the grant officer.)
10e	Federal Share of Expenditures	Enter the cumulative amount of accrued expenditures for allowable costs associated with the funds authorized on Line10d. Accrued expenditures are the sum of actual cash disbursements for direct charges for goods and services; the amount of indirect expenses charged to the award; **MINUS** any rebates, refunds, or other credits; **PLUS** the total costs of all goods and property received or services performed, **whether or not an invoice has been received or a cash payment has occurred**. Accrued expenditures are to be recorded in the reporting quarter in which they occur, regardless of when the related cash receipts and disbursements take place. Unless cash advances have been made to subrecipients, this entry will usually be greater than Line 10b, cash disbursements, because accruals (goods and services received but not yet paid for) must be included on this line item. In addition, recipients operating on a reimbursement basis must report all accrued expenditures (including cash disbursements for allowable grant activities) in the quarter in which they occur (no matter what source initially pays the costs.)

FFR Number	Reporting Item	Instructions
		HARD EDIT - Line 10e cannot exceed Line 10d. SOFT EDIT - Line 10e for "This Period" should not be negative. CAUTION: If entry for this line item is less than previous period cumulative amount, a valid explanation should be provided in Item 12, Remarks.
10f	Total Administrative Expenditures	**An entry is <u>required</u> for this line item for all grants subject to an administrative cost limitation.** This is a new line item to capture administrative costs which were previously required to be reported in the Remarks section of the SF 269, or were otherwise required on the administrative expenditure line item of a modified SF 269. Specific grants, such as the WIRED grants, may be identified as exempt from breaking out administrative costs. Enter the cumulative amount of accrued expenditures for administrative activities. Administrative costs must be necessary and reasonable costs (direct and indirect) which are not related to the direct provision of services to participants, but relate to overall general administrative functions. Consult the appropriate program rules and regulations and/or grant award specifications for specific definitions and/or limitations on administrative costs. **(This line item is a portion of the amount reported on Line 10e.)** If no data entry is required, a ZERO must be entered.
10g	Federal Share of Unliquidated Obligations	Enter any obligations (legally binding commitments to expend subject grant funds authorized) for which an accrued expenditure has not yet been incurred, as of the reporting period end date. Unliquidated obligations should include amounts which will become due to subrecipients and subcontractors. On the final report, this line item should be zero. NOTE: For DOL/ETA grants, the only liquidation that can occur during closeout is the liquidation of accrued expenditures (NOT obligations) for goods and/or services received during the grant period. *Do not include any amount on Line 10g that has been reported on Line 10e or 10f. Do not include any amount on Line 10g for a future commitment of funds (e.g., entire lease, budgeted salary costs) for which an obligation has not yet been incurred.*
10h	Total Federal Obligations	This is an automatic calculation, which is the sum of Lines 10e and 10g. HARD EDIT – Line 10h must be equal to Line 10e plus Line 10g

FFR Number	Reporting Item	Instructions
		HARD EDIT - Line 10h cannot exceed Line 10d.
10i	Unobligated Balance of Federal funds	This is an automatic calculation, which is Line 10d minus Line Item 10h. HARD EDIT - Line 10i must be equal to Line 10d minus Line 10h
Recipient Share:		
10j	Total Recipient Share Required	Enter the total match requirement, as identified in the grant award document and on the grant budget form, 424A. If subject grant has no match requirement, a ZERO must be entered.
10k	Recipient Share of Expenditures	Enter any non-Federal funds expended, by recipient organization, for the purposes or activities of subject grant. Expenditures identified on this line item must be allowable costs which could otherwise have been paid for out of subject grant funds. These expenditures should include both match and other non-Federal leveraged resources. The value of allowable non-Federal in-kind match contributions should also be included. This entry may (and often will) exceed the required match entered on Line 10j. NOTE: Non-Federal funds expended for the purposes or activities of subject grant, which are allowable under all OMB Circulars, but which are not completely allowable under subject grant (due to a program specific restriction), should **not** be reported on this line item, but should be included in the quarterly progress report.
10l	Recipient Share of Unliquidated Obligations	Enter any obligations (legal commitments to expend non-Federal funds) for which an accrued expenditure has not yet been incurred, as of the reporting period end date. *Do not include any amount on Line 10l that has been reported on Line 10k. Do not include any amount on Line 10l for a future commitment of funds (e.g., entire lease, budgeted salary costs) for which an obligation has not yet been incurred.*
10m	Total Recipient Share (sum of Lines 10k and 10l)	This is an automatic calculation, which is the sum of Lines 10k and 10l. NOTE: This amount may exceed the required match entered on Line 10j. HARD EDIT - Line 10m must be equal to Line 10k plus Line 10l.
10n	Remaining Recipient Share to be Provided (Line 10j minus Line10m)	This is an automatic calculation, which is Line 10j minus Line 10m. When the match requirement identified on Line 10j has been met, the value on Line 10n will be automatically set to zero. HARD EDIT - Line 10n must be equal to Line 10j minus Line 10m

FFR Number	Reporting Item	Instructions
		HARD EDIT - Line 10n cannot be negative; when Line 10j and Line 10m are equal, Line 10n will automatically set to 0.
Program Income:		
10o	Total Federal Program Income Earned	Enter the total amount of program income earned as the result of allowable grant activity. The addition method for recording and reporting program income is required for all ETA programs/grants. For additional reference, program income is defined in the applicable program regulations and in 29 CFR 95.24 and 29 CFR 97.25. Either gross or net program income may be reported. If gross program income is reported, the costs for generating the income should be included on Line 10e. If net program income is reported, the costs for generating the income are subtracted from the total income earned before entering the net amount on 10o. If no program income is earned, a ZERO must be entered.
10p	Program Income Expended	Enter the total cumulative amount of accrued expenditures incurred against the program income earned on Line 10o. NOTE: Program income is to be expended during the same grant period in which it is earned.
10q	Unexpended Program Income (Line 10o minus Line 10p)	This is an automatic calculation, which is Line10o minus 10p. HARD EDIT - Line 10q must be equal to Line 10o minus Line 10p.
11. Additional Expenditure Data Required		
11a	Other Federal funds expended	Enter any other Federal funds expended, by the recipient organization and any subrecipient organizations, but not by any non-subrecipient partner organizations, for the same purposes or activities of subject grant. **Expenditures included must be allowable costs which could otherwise have been paid for out of subject grant funds**. Other Federal funds expended by any non-subrecipient partner organizations for the benefit of this grant program should be included in the quarterly progress report. This entry should include expenditures of all Federally funded leveraged resources, whether or not such expenditures are the result of a leveraging requirement.
12	Remarks	Enter any explanations deemed necessary by the grantee or information required by DOL ETA.
13a-b	Certification	The authorized official certifies accuracy of reported data by entering assigned PIN.
13c	Telephone (Area Code, Number and Extension)	The telephone number of certifying official is automatically displayed.
13d	Email Address	The email address of the certifying individual is automatically displayed.

FFR Number	Reporting Item	Instructions
13e	Date Report Submitted (Month, Day, Year)	The date the FR is certified/submitted to DOL/ETA is automatically displayed.
14	Agency Use Only	This section is reserved for DOL/ETA use.

Obligations

Reporting Obligations for ETA Programs

Learning Objectives

- Explain the difference between an obligation, accrued expenditure, and an encumbrance
- List the various steps in recording, tracking and reporting an obligation at all levels
- Identify some of the common challenges
- Know appropriate resources to consult

Why is this Important?

- Fiduciary responsibility
- Tremendous need
- Scarcity of resources
- Need for consistent financial reporting
  - ETA's financial credibility
  - Future funding availability
  - Over-reporting and under-reporting
    - Both lead to funds being lost

What is an Obligation?

- For the Federal Government
  - OMB Circular A-11
  - Legally binding agreement
  - Expenditure now or in the immediate future
  - Resources must be available before obligation incurred
- For Grantees
  - 29 CFR 97.3 and 95.2
  - Orders placed, contracts and subgrants awarded, goods and services received during a given period
  - Payment during the same or future period

Characteristics of an Obligation

- Legal commitment to pay
- Occurs at time services rendered
- Before services rendered where binding agreement exists
- "Definite and certain" – Comptroller General

Examples of Obligations

- Contracts and subgrant agreements
  - Contract for payroll services
- Purchase orders
  - An order for One-Stop furniture
- Cash payments
  - Payment of a bill an airline ticket

Obligation vs. Encumbrance

But what about…

- Projected staff time?
- Future rent payments?
- Future or projected training?
- Individual Training Accounts (ITAs)?
- Items budgeted during period of grant award?

What is an Encumbrance?

- An anticipated expenditure or funds restricted for anticipated expenditures
- Projected costs due in a current or future period
- May not be paid in advance of actual work
- Expenditure is not definite or certain
- No legal liability to pay
- **IS NOT REPORTED**

Examples of Encumbrances

- Future rent payments
- Staff salaries that will be paid when work is performed
- Projected training costs for participants

Obligation or Encumbrance?

- Light Bill?
- Estimated funds budgeted to cover next week's payroll costs?
- Estimated funds budgeted to cover the quarter's staff costs?
- Estimate prepared by technician to fix copy machine?
- Invoice from technician for repairs made to copy machine?

Life Cycle of an Obligation

Step 1 Is there a legal commitment to pay
Step 2 Record in the books of account
Step 3 Monitor status of obligations
Step 4 Report obligations on 9130 form
Step 5 Periodic reconciliation and adjustment

What's an Accrued Expenditure?

- Charges incurred in a given period
- Goods and property received – whether or not a payment is made.
- Services performed
  - Employees, contractors, subgrantees, etc.

Type of activity	Obligation	Accrued Expenditure	Encumbrance
Good/services received and paid for	✗	✗	
Good/services received but not paid for	✗	✗	
Good/services ordered, paid for but not received	✗	✗	
Good/services ordered but not received and not paid for	✗		
Good/service promised but not ordered not received and not paid for			✗

Obligations for Specific Items

When does the
Obligation get reported???

Obligation for Salaries

- When salaries are earned
  - Including related items
    - Retirement fund contributions, etc.
    - Initially recorded as both an obligation and an accrued expenditure for reporting purposes

Obligation for Leave (1)

- Unfunded Leave System
- Obligation occurs
  - Recorded when leave taken
  - When payable as "terminal" leave
  - Initially obligated at the same time as the accrued expenditure

Obligation for Leave (2)

- Funded leave system
  - Recorded at the time leave is earned
  - Escrow accounts
- Benefits
  - Costs are charged to the most appropriate source of funding at the time it is earned
  - Funds are available when leave is taken, or paid as terminal leave

Obligation of Leases

- Length of lease has no bearing
- Amount
  - Current occupancy month
  - Maximum payment for termination
    - Not entire lease amount
- Unoccupied space is not an obligation

Obligation of Travel Expenses

- Travel actually performed
- Ticket purchased
- Issuance of travel authorization
  - Only approval to travel

Individual Training Account (ITA)

- Issuance of an ITA
  - Authorization for training only
- Obligation?
  - At time of participant enrollment in training
  - At time payment is due and payable (if due up front)
  - If a financial agreement is executed between grantee and training institution for specific training

Training Contracts

- Single Semester
  - Contract to obligate funds and pay on an "as training received" basis
- School Year
  - Contract to obligate funds for school/program year and pay each semester/quarter cost as training received

Training Contracts (cont.)

- Multiple Year Program of Instruction
  - Contract to obligate this year's funds with an option for renewal when next year's funds become available
  - Contract to obligate this year's funds for multiple years

Additional Challenges

- Reporting encumbrances as obligations
- Not having a system in place to capture obligations appropriately
- Not reviewing unliquidated obligations
  - Deobligation of unused funds

Resources

- One Stop Comprehensive Financial Management Technical Assistance guide:
  www.doleta.gov/grants/pdf/FinalTAG_August_02.pdf
- TEGL 28-10
  - Reporting definitions and examples
- Online Training Modules
  www.workforce3one.org/resources

Accrual Reporting

Accrual Reporting

Learning Objectives

- Define accrued expenditures
- Identify examples of accrued expenditures
- Determine when and how accruals are reported at all levels, including the subrecipient level

Accrued Expenditures

Charges incurred during a given period for goods, services or other tangible property received and other amounts becoming owed for which no current service or performance is required.

Regardless of whether or not a cash payment is made.

Cash Disbursement

The sum of actual cash disbursements for direct charges for goods and services, the amount of cash paid out for indirect expenses charged to the grant, and the amount of cash advances and payments made to subrecipients and subcontractors.

Why is Accrual Reporting Important?

- In accordance with GAAP
- Provides more reliable information to USDOL and Congress
- Allows for more effective management of programs
- Consistent financial reporting

Why is Accrual Reporting Important? (cont'd)

- Cash basis understates true spending
- Failure to report on accrual basis could result in loss of funds

Items for which Costs may be Accrued:

- Training
- Salaries
- Annual Leave (funded and unfunded)
- Travel
- Leases

Obligation vs. Accrual

- Orders Placed
  - Delivery and payment in future
    - Obligation, not accrual
- Delivery taken, payment in future
  - Obligation
  - Accrued expenditure
- Payment & delivery simultaneous
  - Obligation
  - Accrued expenditure
  - Cash outlay

Definitions and References

- 29 CFR 95.2
- 29 CFR 97.3
- 2008 Governmental Accounting Standards Board (GASB), Section 1700 and 1700.128
- 31 USC Section 6503, Cash Management Improvement Act

Common Challenges

- Lack of reporting compliance
- Lack of consistent reporting
- Underreporting of program expenditures

Common Accrual Reporting Issues

- Grantees not reporting on accrual basis
- Cash disbursements exceed accruals
- Inaccurate reporting at subrecipient levels, which result in inaccurate reporting by prime grantees

Reminder

If you are a prime grantee that provides funding to subrecipients, all expenditures must be rolled up and accurately reflected on the "Federal Share of Expenditures" (line 10e) on the ETA-9130 report in the period in which they are incurred.

Tracking and Reporting Accruals Common Challenges

- ITA's and Training Contracts
- Salaries and Related Costs
- Leave (funded and unfunded)
- Travel
- Leases

Individual Training Account (ITA)

- Accrued Expenditure
  - If paid upon enrollment, at time payment is due and payable
  - If paid after training begins, costs are accrued as training occurs, at least quarterly, regardless of whether payment has been made
  - Depends on institution's payment policy
- Issuance of an ITA
  - Authorization for training only

Salaries

- Accrued expenditure
  - At the time the salaries are earned
  - When the services are rendered

Leave (unfunded)

- Accrued expenditure
  - Recorded when leave taken
  - When payable as "terminal" leave

Leave (funded)

- Accrued expenditure
  - Recorded when leave earned
  - Funds drawn and deposited in a restricted account

Travel Expenses

- Accrued expenditure
  - Travel actually performed
  - Ticket purchased

Leases

- Accrued Expenditure
  - As service is provided
  - Space is occupied
  - May be paid in advance

REMEMBER

All accrued expenditures are obligations

BUT

Not all obligations are accrued expenditures

Grantees Report

- Accrued expenditures on the ETA- 9130
- Based on data obtained from accounting system and subrecipient reports
- Linking spreadsheets, if cash based system
- Source documentation
- Data maintained and supported in compliance with GAAP

Subgrantees must Report Accruals:

- Based on frequency required by grantee
- Based on report forms designated by grantee

For local areas, this means reporting format and frequency of reports will be based on instructions provided by the State.

Subgrantee Reporting (cont'd):

- Data obtained from accounting system
- If cash based system, linking spreadsheets
- Supported by source documentation

In conclusion, it is important to remember:

- All accrued costs must be reported
- All reports must trace to source documentation
- Cash basis accounting
  - Linking records must be maintained
  - Maintained in accordance with GAAP

For reporting issues or technical assistance, grantees should contact the following:

- Grantee: ETA Federal Project Officer
- Subgrantees: Grantee

Exercise: Has an Accrual been Established?

Has an accrual been established?

For each item below, provide a "yes" or "no" to indicate whether an accrual has been established.

1. You pay staff payroll cost in January for hours staff worked in December. Has an accrual been established?

2. An employee received an approved travel authorization from his manager. The trip will cost $600. Has an accrual been established?

3. You sign a contract with a community college. The college will provide GED prep courses for your participants starting next month. Is the cost of the contract an accrual?

4. You have a signed subgrant agreement with a local area to provide employment services. The services will be performed next quarter. Has an accrual been established?

Do you report that as an accrual on the quarterly report due this quarter?

5. You ordered copy paper on your Staples account and you just received your paper. You haven't paid for the paper yet. Have you established an accrual yet?

6. You were granted approval by the Grant Officer to buy a $6,000 piece of equipment needed for job training. You ordered the equipment yesterday and it will take two weeks to arrive. You have to submit your quarterly financial report today. Do you report that $6,000 as an accrual?

Administrative and Indirect Costs

Administrative and Indirect Costs

What's the difference?

Learning Objectives

- Define administrative costs.
- Describe the difference between direct and indirect costs.
- Describe what an indirect cost rate agreement is and where you go to apply for one.
- Describe the relationship between administrative costs, program costs, direct costs and indirect costs.
- Track and report administrative and indirect costs

Why this is Important?

- Failure to track and report costs accurately can lead to disallowed costs.
- Common Problems:
  - Distinguishing between Administrative and Program Costs
  - Distinguishing between Administrative and Indirect Costs
  - Inappropriate reporting of costs may lead to exceeding limitations

Administrative Costs

Two Basic Cost Categories

- Administration
  - Function based
  - Not related to direct program services
  - Can be both direct and indirect
- Program Activities
  - All grant costs that relate to direct provision of services to participants and employers

Cost Classification

- Process of assigning costs to benefitting cost objectives
- Placing costs into some category such as:
  - Administration, Program, Program income, Match or leveraged resources
  - Or some other category as prescribed by statute.
- General Ledger or Books of Account

Administrative Costs - Definition

- 20 CFR 667.220 – applies to all grants and programs receiving WIA Title I funds
- Definition also applies to other ETA grants
  - Referenced in the grant agreement
- Allocable portion of necessary and reasonable costs that are not related to direct provision of workforce services

WIA Administrative Costs

Administrative Functions

- Accounting, budgeting, financial and cash management
- Procurement and purchasing
- Personnel and property management
- Payroll, audit and general legal services
- Oversight and monitoring of administrative activities
- Developing information systems and procedures related to administrative functions

Administrative Cost Limitations

- Specific to each grant
- Contained in Grant Agreement
- Measured at conclusion of grant period
- Tracked, accounted for & reported quarterly
- Includes direct and indirect administrative costs

Administrative or Program?

- Oversight and monitoring
- Goods and Services
- Travel
- Information Systems

It depends on the nature of function or activity

Administrative or Program? (cont.)

- Who must classify costs as both administrative and program.
  - State and local *Workforce Investment Boards*
  - *All Direct recipients*

Subrecipients
- WIA Local fiscal agents
- WIA Local grant recipients
- WIA One-stop operators
- All other subrecipients do not have to classify costs

Administrative or Program? (cont.)

- Awards or contracts to subrecipients or vendors
  - Depends on the nature of the subaward
- Costs of personnel who perform both administrative and program services
  - Must be allocated

Administrative or Program? (cont.)

Job Title vs. Job Function

- It is the Job Function NOT the Job Title That Dictates Cost Classification

Indirect Costs

Direct Cost or Indirect Cost?

- Direct Costs
  - Cost identified with a specific grant
- Indirect Costs
  - Cost shared among multiple programs
  - Cost shared among multiple categories
- Direct and Indirect Costs Can Be Either Administrative or Program

What are Indirect Costs? (It's easier if we identify direct costs first.) Direct costs…

- Those costs that can be readily identified with a particular cost objective. Examples: (program specific)
  - Salaries – LWIB program staff
  - Space – sq. ft. occupied by direct staff
  - Supplies – used by direct staff
  - Communications – used by direct staff

What are Indirect Costs?

- Those costs which are not readily identifiable with a particular cost objective. Examples:
  - Salaries – Executive Director, Accountant, etc.
  - Space – sq. ft. occupied by indirect staff
  - Supplies – used by indirect staff
  - Communications – used by indirect staff

Conceptualizing Direct and Indirect

Cost Allocation

- The process used to distribute costs based on the concept of benefits received
- Benefit to grant program and cost objectives in particular
- Direct charged to single objective, shared split across objectives, or indirect
- General Ledger or Books of Account

What's an Indirect Cost Rate Agreement?

- Agreement between a recipient and federal agency that specifies the treatment of indirect costs.
- Ratio between the total indirect expenses and some direct cost base.
- Based on indirect cost proposal and supporting documentation

Applying for an Indirect Cost Rate

- Must seek approval within 90 days of grant approval
- Where?
  - Cognizant Agency (determined based on Fed. Agency providing largest amount of direct Fed. Funds for non-profits; gov't orgs assigned by OMB)
  - If ETA grant is only Federal award, DOL is cognizant

Applying for an Indirect Rate

- DOL's Division of Cost Determination
- Telephone: 202-693-4100
- *"A Guide for Indirect Cost Rate Determination"*
- *http://www.dol.gov/oasam/programs/boc/ocd-guide-main.htm*

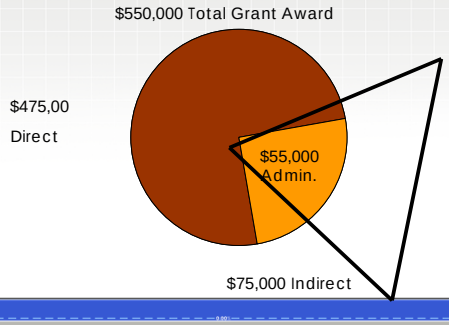
Relationships

Administrative, Program, Direct and Indirect Costs

- Complex and inter-connected
  - Not all direct costs are program
  - Not all administrative costs are indirect
  - Not all indirect costs are administrative

See Handout A – WIA Admin & Program Costs

Administrative Costs May be BOTH Direct & Indirect



Administrative Costs ≠ Indirect Costs

- For ETA grants, administrative cost limits are based on a percent of the total grant award.
- Indirect cost rates are a percent of a specific direct cost base.

Grantee Indirect Costs Example

[Approved Indirect Cost Rate of **50%]**

- Organization-wide Direct Salaries & Wages are **$300,000**
- Total Indirect Costs to be spread to all fund sources are **$150,000**
- ETA Grant is **$550,000**
- ETA Grant Direct Salary & Wages are **$150,000**
- Indirect Costs Charged to ETA Grant are **$75,000**

Administrative Costs vs. Indirect Costs

- ETA Grant is $550,000
- Administrative Limit is 10%
- ETA Grant Administrative Costs are limited to $55,000 (10% x $550,000)
- Indirect costs chargeable to grant are $75,000

Reporting appropriately

- Review costs of your organization that comprise indirect cost pool
- Break out costs between program and administrative
  - Using the WIA definition of Administrative Costs
- Example follows

Pool of Indirect Costs

Accounting System	A
Procurement System	A
Director	P&A
Receptionist	P&A
Facilities (rent, insurance, maintenance and utilities costs)	P&A

- Assume this calculates to 65% administrative and 35% program

Then,

- Apply the 65% - 35% ratio to the total indirect costs of $75,000 for the grant, as calculated in the example used in the slides we have been using.
- Indirect Administration = $48,750
- Indirect Program = $26,250

Total Grant Costs

- All Administrative Costs
  - Both Direct and Indirect

  PLUS

- All Program Costs
  - Both Direct and Indirect

Total Grant Costs

Total Reported Expenditures $550,000			
Total Program Costs $495,000		Total Administrative Costs $55,000	
Direct $468,750	Indirect $26,250	Direct $6,250	Indirect $48,750

Overall Considerations

Reporting Admin. and Indirect Costs

- Both administrative and indirect costs are accounted for in the General Ledger.
- Both are included on the ETA 9130 under total expenditures
- Administrative costs are specifically broken out from total expenditures (line 10f)

Documentation for Cost Classification

- Supporting records/documents for both direct and indirect costs (Invoices, certified time sheets, actual receipts)
- Time distribution method (based only on actual time worked)
- Cost allocation method for non-personnel costs

Resources and Assistance

For more information and assistance:

- 20 CFR 667.220
- 20 CFR 667.300
- OMB Circulars and Cost Principles
  -http://www.whitehouse.gov/omb/circulars/
- Online training modules (Workforce3One)
- Technical Assistance Guide:
  -www.doleta.gov/sga/pdf/FinalTAG_August_02.pdf
- DOL's Office of Cost Determination

Additional Web Site Addresses

- ETA Financial Reporting Formats
  www.doleta.gov/grants/financial_reporting.cfm
- Administrative Requirements-29 CFR Parts 95 and 97
  http://ecfr.gpoaccess.gov
- DOL Advisories and Memorandums (TEGL/TEN)
  http://wdr.doleta.gov/directives/

Handout A- WIA Administration Costs

What Workforce Investment Act Title I Functions and Activities Constitute the Costs of Administration Subject to Administrative Cost Limit?

The **costs of administration** are that allocable portion of necessary and reasonable allowable costs of…

- State and local *Workforce Investment Boards*
- *Direct recipients* including:
  - State grant recipients
  - Local grant recipients
  - One-stop operators
  - Local grant subrecipient - *117(d)(3)(b)(i)(II)*
  - Local fiscal agents - *117(d)(3)(b)(i)(II)*

…associated with the major functions.

These costs:

- Are not related to the direct provision of workforce investment services, including services to participants and employers
- Can be personnel
- Can be non-personnel
- Can be direct
- Can be indirect

ADMINISTRATIVE COSTS

1 General administrative functions and coordination of functions:

- accounting
- audit resolution
- audits
- budgeting
- financial and cash management
- general legal services functions
- incident report resolution
- information system development (see **5**)
- investigation resolution
- payroll functions
- personnel management
- procurement
- property management
- purchasing
- review resolution
- development of systems and procedures for administrative functions

2 Oversight and monitoring related to WIA Administrative functions

3 Costs of goods and services required for administrative functions of the program, including goods and services such as:

- office supplies
- postage
- rental and maintenance of office space
- rental or purchase of equipment
- utilities

4 Travel costs incurred for official business in carrying out administrative activities or the overall management of the WIA system

5 Costs of information systems related to administrative functions. For example:

- personnel
- procurement
- purchasing
- property management
- accounting and payroll systems, including the purchase, systems development and operating costs of such systems.

6 Awards to subrecipients or vendors that are solely for the performance of administrative functions.

PROGRAM COSTS

1 Specific costs charged to an overhead or indirect cost pool that can be identified directly as a program cost.

Note: Documentation of such charges must be maintained

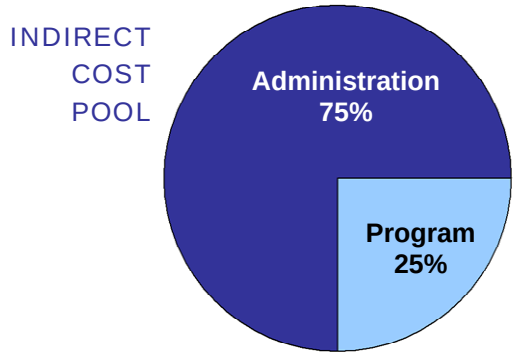
2 All costs incurred for functions and activities of subrecipients and vendor are charged as a program cost.

Note: Except for those awards to subrecipients or vendors that are solely for the performance of administrative functions

3 Costs of the following information systems, including the purchase, systems development and operating (e.g. data entry) costs are charged as a program cost.

- Tracking or monitoring of participant and performance information
- Employment statistics information, including job listing information, job skills information, and demand occupation information
- Performance and program cost information on eligible providers of training services, youth activities, and appropriate education activities.
- Local area performance information
- Information relating to supportive services and unemployment insurance claims for program participants.

4 That portion of indirect costs determined as a proportionate share of the indirect costs in the indirect cost pool which are the costs of program functions, not administrative functions.



Indirect Cost (IDC) Rate	=	20%
Total Costs in ICP / Base (e.g. Total Direct Salaries & Wages)	=	$400,000 / $2,000,000

WIA Total Direct Salaries & Wages x IDC Rate = = Indirect Amount For WIA

$1,000,000 x 20% = $200,000

25% of $200,000 = $50,000 Program

75% of $200,000 - $150,000 Administration

ADMINISTRATIVE OR PROGRAM COSTS

- Personnel and related non-personnel costs of staff who perform both administrative functions and programmatic services are to be allocated as

  administrative costs **or** program costs

  to the benefitting cost objectives/categories based on documented distributions of actual time worked or other equitable cost allocation methods

- Continuous improvement activities are charged to

  administration **or** program

  based on the purpose or nature of the activity to be improved.

  Note: Documentation of such charges must be maintained.

Handout B-

Liberty Bell Inc.

Handout B: Liberty Bell, Inc.
Administrative and Indirect Costs
for ETA Programs

Liberty Bell, Inc.
Non-profit with multiple funding streams
Federal and Non-Federal Funding Received

	Fund Sources				
	Grant A – $1 Million (Federal $) – US DOL	**Grant B – $1 Million (Federal $) – US Dept of Ed**	**Grant C – $2 Million (Federal $) - HHS**	**Grant D – $2.5 M (State $)**	**Grant E – $1.5 M (Foundation $)**
Costs	- Portion of Program Man. salary (Ms. Woo) - Portion of Counselor salary (Ms. Nice) -Equipment* -Rent for program office -Tuition for participants -DATAMAX (Participant tracking and performance data system) -Auditor -Postage -Office Supplies -Utilities	- Portion of Program Man. salary (Ms. Woo) - Portion of Counselor salary (Ms. Nice) -Equipment - Rent for program office - Tuition for participants - Room rental fee for computer lab used by participants -Postage -Office Supplies -Utilities	- Portion of Program Man. salary (Mr. Wallace) - Portion of Counselor salary (Ms. Nice) -Equipment Van maintenance fees - Tuition for participants -WIZWIT (Procurement Management System) -Postage -Office Supplies -Utilities	- Portion of Program Man. salary (Mr. Wallace) - Portion of Counselor salary (Ms. Nice) - Equipment -Faxed surveys -Software used by researcher to analyze survey data. -Postage -Office Supplies -Utilities	- Portion of Program Man. sal. (Mr. Wallace) - Equipment - Rent for program office Contractor hired to develop curriculum for training -Postage -Office Supplies -Utilities

* For all fund sources referenced in this example, the equipment is needed for job training of participants or other outcomes directly related to performance under the grant, not to perform administrative functions.

Handout C and D-

Liberty Bell Personal and Total Costs

Handout C

Liberty Bell Inc - Allocation of Personnel Worksheet

					Federal Grants (a)*			Non-Federal Funds (b)*			
Employee	Position	Annual Salary	Indirect Costs	Direct Costs (a+b)	Dept. of Labor Grant A	Dept. of Educatio Grant B	Dept. of HHS Grant C	State Grant Grant D	Private Foundation Grant E	Local government	Fundraising
Ms. Bell	Executive Director	$100,000	$90,000	$10,000							$10,000
Ms. Polite	Administrative Assistant	20,000	20,000								
Mr. Rollins	Accountant	70,000	70,000								
Ms. Woo	Program Manager	60,000		$60,000	30,000	30,000					
Mr. Wallace	Program Manager	50,000		50,000		$10,000	$30,000	$10,000			
Mr. Sheen	Program Manager	52,000		52,000	$25,000	$20,000	$7,000				
Mr. Facks	Researcher	75,000		75,000				$60,000	15,000		
Ms. Nice	Counselor	40,000		40,000	$10,000	$10,000	$10,000	$10,000			
Mr. Teach	Instructor	30,000		30,000				$15,000		15,000	
		$497,000	$180,000	$317,000	$65,000	$70,000	$47,000	$95,000	$15,000	$15,000	$10,000

*Note: Dollar amounts here are based on distribution of time spent on that project/activity. All amounts are direct charges.
The salaries included in this exhibit are for illustrative purposes only.

Handout D

Liberty Bell, Inc - Statement of Total Costs - All Funds - and

Distribution of Indirect Costs to the Cost Centers using two Sample Methods of Allocation [6] (3 STEPS)

Direct Allocation Method

STEP 1 - Do Statement…

Budget Category	Total Costs	Less: Direct Exclusions and Indirect Unallowables Costs	Indirect Costs (3)	Modified Total Direct Costs (MTDCs)	Federal Programs: Total Federal Programs	Dept. of Labor	Dept. of Education	Dept. of HHS	Non-Federal Programs: Total Non-Federal Programs	State Grant Grant C	Private Foundation	Local Government	Fund-raising
	A = B+C+D	B	C	D = E+F	E				F				
Salaries	$497,000		$180,000	$317,000	$182,000	$65,000	$70,000	$47,000	$135,000	$95,000	$15,000	$15,000	$10,000
Fringe Benefits (19.98%)	99,301		35,964	63,337	36,364	12,987	12,255	11,122	26,973	18,209	1,564	3,000	4,200
Total Personnel Costs	596,301		215,964	380,337	218,364	77,987	82,255	58,122	161,973	113,209	16,564	18,000	14,200
Consultant Services	26,000		14,000	12,000	10,300	7,000		3,300	1,700		1,700		
Staff Travel	39,700			39,700	33,000	12,000	9,000	12,000	6,700		6,700		
Bad Debts	10,000	10,000 (1)											
Office Rent	28,344		5,000	23,344	18,544	4,600	8,544	5,400	4,800		2,000		2,800
Supplies	14,600		1,100	13,500	11,500	4,000	4,000	3,500	2,000	900	100	1,000	
Accounting (payroll processing for partcicipants)	100,000			100,000	100,000	20,000	40,000	40,000	0				
Other Subcontracts	368,000			368,000	300,000	125,000	100,000	75,000	68,000	50,000	18,000		
Purchase, Lease of Equipment	59,900		10,700	49,200	39,900	16,700	8,400	14,800	9,300	9,300			
Telephone	9,694		4,254	5,440	1,930	825	451	654	3,510	455	855		2,200
Entertainment	1,800	1,800 (1)											
Insurance and Bonding	23,789		8,400	15,389	14,189	5,400	4,200	4,589	1,200		1,200		
Postage and Delivery	27,154		5,100	22,054	15,600	3,200	4,900	7,500	6,454	554	2,400		3,500
Training Materials	13,500			13,500	12,300	10,000	1,000	1,300	1,200	600	600		
Tuition for participants	62,100			62,100	62,100	36,100	16,000	10,000	0				
Allowable Participant Support Costs	18,238			18,238	18,238	6,900	7,215	4,123					
Total Non-Personnel Costs	802,819	11,800	48,554	742,465	637,601	251,725	203,710	182,166	104,864	61,809	33,555	1,000	8,500
TOTAL	$1,399,120 (4)	$11,800	$264,518	$1,122,802	$855,965	$329,712	$285,965	$240,288	$266,837	$175,018	$50,119	$19,000	$22,700

STEP 2 - Rate Calculation…

Indirect Cost Rate Calculation

Indirect Costs	$264,518
Method A - Total Direct Salaries & Benefits	380,337
Indirect Rate	69.55%
Indirect Costs	$264,518
Method B - MTDCs	$1,122,802
Indirect Rate	23.56%

STEP 3 - Distribution to the Cost Centers

Distribution of Indirect Costs (ICs) - (5)

		a				b					Total a+b
Method A (6)	Allocation Base	218,364	77,987	82,255	58,122	161,973	113,209	16,564	18,000	14,200	380,337
	Times Indirect Rate	69.55%	69.55%	69.55%	69.55%	69.55%	69.55%	69.55%	69.55%	69.55%	
	Equals Allocable Share of ICs	$151,868	$54,239	$57,207	$40,423	$112,650	$78,735	$11,520	$12,519	$9,876	264,518
Method B (6)	Allocation Base	855,965	$329,712	$285,965	$240,288	266,837	175,018	$50,119	$19,000	$22,700	1,122,802
	Times Indirect Rate	23.56%	23.56%	23.56%	23.56%	23.56%	23.56%	23.56%	23.56%	23.56%	
	Equals Allocable Share of ICs	$201,655	$77,676	$67,370	$56,609	$62,863	$41,232	$11,807	$4,476	$5,348	264,518
	Difference between A & B (A-B)**	($49,786)	($23,437)	($10,163)	($16,186)	$49,786	$37,503	($287)	$8,043	$4,528	

(1) and (2) - Refer to notes of Exhibit E for explanations.
(3) This column must be split to show multiple rate structures (G&A, onsite, offsite, if applicable.
(4) Must reconcile to the Financial Statements.
(5) Is the result of multiplying the indirect rate times the allocation base for each cost center.
(6) For sample purposes only. Other allocation methods may be proposed as long as it provides and equitable and rational distribution of indirect costs. Contact DCD for more details.

Note: The costs included in this exhibit are for illustrative purposes only.

Matched and Leveraged Resources

Match & Leveraged Resources for ETA Programs

What is the difference?
Why is it important?

Learning Objectives

- Describe the difference between match and leveraged resources
- Determine how cash and in kind match and leveraged resources are valued
- Describe the proper reporting of all leveraged resources
- Identify some of the common challenges faced by grantees in valuing, tracking and reporting match and leveraged resources

Why is this Workshop Important?

- Distinction poses challenges for grantees.
- Dispel common misconceptions about reporting match and leveraged resources
- Failure to meet requirements can lead to grant reduction or disallowed costs
- Stand-in costs

Match

AKA Cost Sharing

What is Match?

- Additional non-Federal funds expended to support grant objectives
- If required by statute as a condition of funding.
- Must be spent on allowable grant activities

Where are the Requirements for Match Found?

- 29 CFR 97.24
  - State, local and Indian Tribal governments
- 29 CFR 95.23
  - Non-Profits, Hospitals, Institutions of Higher Education and Commercial Organizations

Does my Grant have a Match Requirement?

- Legislation
- Regulation
- SGA – Solicitation for Grant Application

Two Types of Match Expenditures

- Cash expenditures
  - Funds or services provided and paid for by grantee or subrecipient from non-Federal funds
  - Allowable services under grant
  - 3rd party cash contribution to grantee spent by the grantee on allowable costs
- In-kind contributions
  - Products, space or services provided by a third party organization and not paid for by grantee or subgrantee

Cash Match Examples

- Personnel services
  - Grantee/subrecipient staff
- Services
- Equipment & supplies
- Space
- Costs are paid for by grantee/subrecipient but not charged to grant funding source
  - Must be documented

In-Kind Contribution Examples

- Personnel services
  - Volunteers or paid non-grantee staff
- Services
- Equipment & supplies
- Space
- Valuation requirements
  - 29 CFR Part 97.24(b)(7)
  - 29 CFR Part 95.23(c-h)
  - Must be documented

In-Kind Valuation

- Personnel Services
  - Individual performing regular job activity
    - Regular rate of pay + allocable fringes
  - Individual performing other volunteer services
    - Rates consistent with recipient pay for like work or
    - Rates of other local area pay for similar work
    - Include reasonable amount for fringe benefits

In-Kind Valuation (cont.)

- Loaned equipment
  - Fair rental value
- Donated equipment or supplies
  - Fair market value at time of donation or
  - Depreciation or use allowance [when item has long term value]
- Donated space use
  - Fair rental value of comparable space
  - Depreciation or use allowance
- Donated buildings and land
  - Depreciation or use allowance

Match Exclusions

- Costs
  - Paid for with Federal funds
  - Used as match for other Federal program
  - Construction/purchase of facilities (WIA)
  - Charged to program income
- Difference between earnings and costs

Knowledge Check

- How would I know if there is a match requirement for my grant?
- Cash or in-kind? - Grant-related services paid for by the grantee.
- Cash or in-kind? - A third party donates the use of training equipment at their shop for program participants to support the project.

Records

- Source documentation
  - Books of account
  - Available for audit & review
- Support for 3rd party contributions
  - Verifiable from subgrantee records or
  - Maintained by grantee
  - Methods used to value in-kind

Additional Match Considerations

- Can't be BOTH match and allowable grant cost
- No administrative cost limitation

Valuing In-Kind Personnel Services

- If privacy rules make it difficult to obtain a volunteer's compensation information, can the grantee use local Labor Market Information wage data to determine those costs?

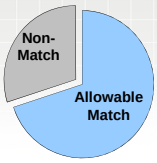
What are Leveraged Resources?

What are Leveraged Resources?

- Not defined in statute, regulation or administrative requirements
  - All resources used by grantee to support grant activity
- Must be on costs allowable under OMB Cost Principles
  - 2 CFR or 48 CFR based on type of organization
- Sum of both allowable match and non-match resources

What are Leveraged Resources? (cont.)

- Allowable match
  - Non-Federal funds used for grant purposes
  - Cash and in-kind



- Non-match
  - Funds available for the project that don't meet criteria for allowable match
    - Other Federal resources provided by grantee or subrecipient
    - Allowable under OMB Cost Principles but not grant program

Examples of Leveraged Resources

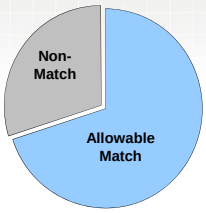
- Not qualify as match
- Services provided to grant participants funded by another Federal grant
- Purchase or construction of a structure that would house grant activity using non-Federal funds
- Employer release time
- Training curriculum donated for use by grantee

Reporting Match and Leveraged Resources

Reporting Match and Leveraged Resources

Non-Match
- Portion reported on the ETA 9130
- Reported on the Quarterly Narrative Progress Report

Allowable Match
- Reported on ETA 9130 as recipient share
- Also reported on Quarterly Narrative Progress Report



Reporting on the ETA 9130

- Match (non-Federal share)
  - Line 10.j. – Recipient share required
  - Line 10.k. – Recipient share provided [includes all amounts in excess of requirement as well]
  - Line 10.l. – Recipient share of obligations, (accrued expenditure not yet incurred)

ETA 9130 (continued)

- Match
  - Line 10.m. – Total recipient share
  - Line 10.n. – Recipient share remaining
    - sets to zero when required match is met
- Leveraged resources
  - Line 11.a. – other federal share provided

Reporting – Quarterly Narrative Progress Report

- All leveraged resources and match provided, including those on the ETA 9130
- Opportunity to report other leveraged resources used

Knowledge Check – Reporting Leveraged Resources and Match

- Where would the grantee report US Department of Education funds spent by their organization in support of their ETA grant ?
- Where would the grantee report the value of supplies and equipment donated to support the project?
- If the grant does not have a match requirement, what should the grantee enter on Line 10j of the ETA 9130?

Knowledge Check – Reporting Leveraged Resources and Match (cont.)

- If there is no match requirement, but the grantee spends allowable non-Federal funds that could otherwise have been paid for out of grant funds to support the grant, where would that be reported on the ETA 9130?

Things to Consider

Grantee Challenges

- Grant application and performance narrative include leveraged resources
  - omitted from 9130 report
- Determining the value of cash and in-kind contributions
- Reporting stand-in costs
  - When no match is required
- Documentation

Some Do's and Don'ts

DO:

- Read carefully to determine whether there is a match requirement for your grant
- Report all match expenditures
  - Including excess of requirements

DO NOT:

- Promise to provide more matching funds than required
- Include leveraged resources on the application budget

Budgets

- Only required match is shown on the SF-424A
- Do not include leveraged resources on the SF-424A
- Amounts shown on SF-424 & 424A
  - Considered as match
  - If not met, may lead to disallowance or grant reduction

Closeout

- If required Match is not met:
  - Like amount of grant dollars will be unallowable
  - Reduce allowable grant expenditure by short amount
  - Non-compliance may result in closeout ID/FD process
- When Leveraged Resources not met:
  - Grant Officer will determine penalty
  - Less likely to be unallowable costs
  - May impact future funding opportunities

Help! – Additional Resources

- Federal Project Officer
- The regulations
  - 29 CFR 97.24
  - 29 CFR 95.23
- Online training on financial management
  - TEN 49-08 and TEN 39-09
  - Webinars and presentations
  - One-Stop Financial Management TAG
    - Online at doleta.gov

Program Income

Program Income

What is it? What do I do with it?

Learning Objectives

- Define program income
- Determine how program income is generated, recorded, and reported
- Determine how program income can be expended
- Identify some of the common problems encountered during program income life-cycle

What is Program Income?

- Additional Funds to Expend
  - Earned as a result of grant activity
- Requirements
  - 29 CFR 97.25 & 29 CFR 95.24
  - 20 CFR 667.200
- Applies to subgrantees as well
- Must be Reported in a Separate Section of ETA 9130

How is Program Income Generated?

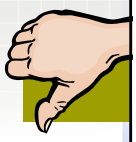
- Fees for services
- Users or rental
- Sale of products

How Else Is It Generated?

- Revenues in excess of expenditures
  - 20 CFR 667.200(a)(6)
  - Applies to governmental or non-profits
    - Fixed price contracts
  - Applies to all WIA Title I programs
- Interest income
  - All WIA Title I programs
  - Allocated if earned under WIA and non-WIA

What is Not Program Income?

- Applicable Credits
- Sale of Property
- Royalties
- Donations
- Profits of Commercial Organizations
- Income Earned After Grant Period
- Interest (non-WIA) and Matching Funds



General Requirements

- Addition method
  - Use to provide additional program services
  - ETA does not reduce grant awards
- Reported quarterly on the ETA 9130
- Expended during grant period
- Both revenues and expenditures indentified in books of account

More on Program Income

- No Administrative Cost Limitation
- Allowable activities
- Proper Classification
- Included in Financial Report
- Other Administrative Rules Apply
- Included in Scope of Audit
- Sanctions for Misuse

Reporting Program Income on the ETA 9130

- 10.o. Total Fed. Program Income Earned
- 10.p. Program Income Expended
- 10.q. Unexpended Program Income

Program income:			
o. Total Federal program income earned	0.00	0.00	0.00
p. Program income expended in accordance with the addition method	0.00	0.00	0.00
q. Unexpended program income (line o minus line p)	0.00	0.00	0.00

Accounting for Program Income Revenues

- Two methods for revenue accounting
- Net Income Method
  - Costs of generating income deducted from revenue
- Gross Income Method
  - Costs of generating income charged to grant

Net Income Method

- Costs incidental to the generation of program income are netted against/ deducted from gross program income
- Expenditures and revenues associated are tracked separately
- Revenues and expenses are netted periodically

Revenue – Costs = Program Income

Net Income Method

- Conference:
  - A grantee held a conference
  - Received $10,000 in registration fees
  - Used $6,000 to cover conference costs
  - The program income reported was $4,000---the amount of revenue that remained after subtracting conference costs. The grant was not charged.

Gross Income Method

- All gross revenues derived from program income activities are accounted for as program income.
- Grantee's share of the allocable costs associated are charged to the grant.
- Funding period assigned is same as the corresponding expenditures charged

Revenue = **Program Income**

(Costs are charged to the grant.)

Gross Income Method

- Conference:
  - A grantee held a conference
  - Received $10,000 in registration fees at the conference
  - Charged the grant $6000 for conference costs
  - All of the revenue generated from the conference would be reported as program income: $10,000.

Accounting for Program Income

- NET – Line 10.o. reflects total PI earned minus costs incident to generating it
  - No cost reported on line 10.e.
- GROSS – Line 10.o. reflects 100% of PI earned
  - Costs incident to generating it were charged to the grant on line 10.e.

Book of Accounts

- Separate Accounting

  or

- Transfer of Expenditures

Expenditure of Program Income – Separate Accounting

- Treated as additional funds committed
- Separately identifiable service performed and expenditure is accounted separately
- Separated for accounting purposes

Expenditure of Program Income – Separate Accounting

- A nonprofit organization earned $5,000 in program income from excess revenues
- Used the program income to provide additional training and placement services
- Established separate accounts by cost category to record the expenditures incurred in providing the additional services

Expenditure of Program Income – Transfer of Expenditures

- Expenditures recorded in the amounts of the original agreement
- Transferred to the program income account to offset the amount of program income earned
- Program income is accounted for as fully expended
- Expenditures charged under the grant agreement are reduced

Expenditure of Program Income – Transfer of Expenditures

- Service provider recorded $1,000 in program income
- Transfers $1,000 in expenditures under the subgrant to the program income account
- Reduces subgrant expenditures by that same amount
- Reports the amount of program income earned, the amount expended by cost category, and final net expenditures charged to the subgrant

True or False

Program income is similar to unrestricted funds in that it can be applied and used for agency wide purposes?

Additional Information

- No Administrative Cost Limitation
- Allowable activities
- Proper Classification
- Included in Financial Report
- Other Administrative Rules Apply
  Included in Scope of Audit
- Sanctions for Misuse

Common Compliance Findings

- Failure to Properly Report Program Income
- Failure to Maintain Adequate Support Documentation
- Failure of grantee to monitor program income of subrecipients

Resources

- One Stop Comprehensive Financial Management Technical Assistance guide:
  www.doleta.gov/grants/pdf/FinalTAG_August_02.pdf
- OMB Circulars
  www.whitehouse.gov/omb/circulars
- Online Training Modules
  www.workforce3one.org/resources

Sub-Recipient Reporting

Subrecipient Reporting

How To Succeed in Reporting Without Really Trying

Subrecipient Reporting

- Identify basic requirements for subrecipient reporting
- Identify important considerations for grantee
- Avoid common subrecipient reporting problems

Why is this workshop important?

- Clarify goals for subrecipient reporting
- Improve report integrity and reliability
- Enhance ability to manage grant funds

Basics

- Start with the reports you must prepare for ETA

- Identify reporting requirements:
  - Timing—Frequency and due dates
  - Data items
  - Rules and regulations

Basics (cont.)

- Timing of Federal reports
  - Quarterly
  - Due 45 days after the end of the quarter

Does this meet your needs for managing your subrecipients?

Timing Issues

- How often do I need financial info from subs to manage the program?
  - Is quarterly sufficient?
  - Time to take appropriate corrective actions?
    - Budget realignments
    - Other modifications
    - Implement corrective action plans?
    - Make other corrections
  - Monthly is better

Timing Issues (cont.)

Another consideration

Transmission method

- Electronic
  vs.
- Paper

Timing Issues (cont.)

- When do I need to receive subrecipient reports?
  - How many subs?
  - How long to compile data?
  - What if reports are late?
  - Or missing?

Data Items

- What information do I need?
  - Same data as on Federal reports?
  - More?
  - Less?

What data do I need to effectively manage?

Data Items – Cost Item Breakouts

- For most programs, Feds ask only for Total costs and Admin
  - What about:
    - Costs by activities?
    - Costs by budget line items?
  - What is in the subagreement?
    - Line item restrictions?
    - Prior approval requirements?

Other Data Items

- What is required on the Federal reports?
  - Cash
  - Obligations
  - Program income – earned and spent
  - Recipients share
  - Match
  - Other Federal funds
- Do I have another way to get this?

Is That All There Is?

- Yikes! I'm already overloaded!
- What other info might I need?
- Is it reasonable?
- Do I need it monthly?
- How long do they need to get me accurate data?

Basics – Rules and Regulations

- What requirements apply to subs?
  - Uniform Administrative Requirements
  - Cost Principles
  - Federal Program Regulations
  - Specific requirements of the grant and your subagreement
  - Federal reporting instructions

Reporting Requirements

- FOR EXAMPLE:
  - Reporting expenditures on the **accrual** basis
  - Following the appropriate definition for administrative costs
  - Adhering to the requirements for program income
  - Allocating costs to funding sources and cost categories/objectives
  - **Accrual** reporting (repeated for emphasis)

Accrual Reporting

- Applies to all levels
- Does not require change in accounting system
- What to do to ensure accrual reporting by subs?

Common Issues

- Grantee's policy
  - Only reimburse for actual costs
  - Require subs to submit paid invoices as backup to reports.

Are they getting accrued expenditure reports?

What Do You Think?

- **What else can this grantee do to get the accrued expenditure information they need for the Federal report?**

Options To Get Accruals Reported Correctly

- Separate expenditure reporting from reimbursement process.
- Have subrecipients submit accrual data as a separate set of reporting items
- Requiring accruals only on a quarterly basis

Common Issues

- Grantee has not issued specific reporting instructions to their subrecipients, but includes the required report format in their "Subrecipient Package."

Are they getting accrued expenditure reports?

Reporting Solutions

- To ensure that you get what you need:
  - Provide reporting guidance to your subs
  - Spell out the reporting requirements
  - Provide definitions and explanations of each reporting item on your format

Common Issues

- My subrecipient is new to ETA grants, but has plenty of experience handling grants with Federal Education funding. I am sure they know how to fill out these reports.

What do I need to worry about?

ETA Reporting Considerations

- ETA grant requirements often differ from other Federal grants.
  - E.g., definition of administrative costs
- Important to ensure subs are clear on the rules and regs that apply to the grant funds they will be responsible for administering for you.

Grantee Responsibilities

- Remember, you are responsible for **ALL** funds under your grant, including those in subgrants.
- Provide guidance to subs in writing
- Provide training to subrecipient staff

Success!

- It is possible to fail in many ways...while to succeed is possible only in one way.
  - Aristotle
- I don't know the key to success, but the key to failure is trying to please everybody.
  - Bill Cosby
- There is nothing so useless as doing efficiently that which should not be done at all.
  - Peter Drucker

Keys To Subrecipient Reporting

- Determine what information you need
- Develop a good reporting format and process
- Provide clear reporting guidance
- Train subrecipient staff on financial rules and requirements

Grant Closeout

Grant Closeout

Learning Objectives

By the end of this session, you will be able to:

- Understand why this workshop is important
- Describe the closeout process and key forms and data used for closeout

Learning Objectives (cont'd)

- Identify prime grantee and subrecipients closeout responsibilities
- Describe activities that occur post closeout and relevant issues
- Know which resources to consult when faced with questions, problems and concerns

Why this workshop is important?

- All grants must be closed after the date of completion of an award in accordance with regulations
- Allows for more effective management of grants and the closeout process

Authority

- 29 CFR Part 97.50
- 29 CFR Part 95.71

Grant Tracking and Notification

An automated system is utilized that allows the electronic processing of expired grants. Recipients can download all documents contained in the closeout package via this system.

The Closeout Process

- Email notification transmitted 30 days prior to grant expiration
- Closeout package is electronically transmitted to grantee
- Documentation must be submitted 90 days from expiration of grant
- Extensions may be granted

Forms Required for Closeout

- State and Local Governments:
  - Grantee's Release
  - Government Property Close-Out Inventory Certification
  - ETA-9130 Closeout Financial Report

Forms Required for Closeout

- Non-Governmental Entity: (Higher Education, Non-Profits, and others)
  - Grantee's Detailed Statement of Costs
  - Indirect Rate Agreement (email or fax)
  - Indirect Charges Calculation (email or fax)

Forms Required for Closeout

- Non-Governmental Entity:
  - Grantee's Release
  - Grantee's Assignment of Refunds, Rebates and Credits
  - Government Property Close-Out Inventory Certification (email or fax)

Forms Required for Closeout

- Non-Governmental Entity:
  - Grantee's Close-Out Tax Certification
  - ETA-9130 Closeout Financial Reports

Forms Required for Closeout

- Multi-funded Grants (UI, TAA, ES, EM and AA)
  - Grantee's Release
  - ETA-9130 Close-out Financial Reports

Common Reporting Issues

- Government Inventory List: This form is used to account for any property purchased with ETA funds
- Match Requirement
- Indirect Cost Rate
- Program Income

Remember: The grantee may only charge allowable expenditures incurred during the period of performance. No additional costs may be incurred after the expiration of the grant.

Prime Grantee Responsibilities

- Monitor and track all grant-related expenditures
- Produce quarterly cost reports
- Maintain source documentation
- Submit appropriate documentation to closeout specialist upon request

Subgrantee Responsibilities

- Monitor and track all grant-related expenditures
- Maintain source documentation
- Provide appropriate documentation to prime grantee upon request

ETA Closeout Unit

- Officially close expired grants in accordance with prescribed procedures, and in coordination with regional office staff
- Ensure that closeout documents are available to grantees
- Reconcile, balance and make necessary adjustments

DOL AUTHORITY

Closeout does not Affect:

- Disallowances
- Debts
- Access to Records
- Property Management
- Audit

Closeout Resources

- Federal Project Officer (FPO)
- ETA-9130 Instructions
- 29 CFR 97.50 and 97.70
- Workforce3One
- Closeout Specialist

Data Validation- Looking Back and Moving Forward

U.S. Department of Labor
Employment and Training Administration

Data Validation

Looking Back and Moving Forward

Recorded and Presented by ETA Staff
June 17, 2011

Employment and Training Administration
DEPARTMENT OF LABOR
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Presentation Description

This presentation will describe the approach to federal monitoring, explore issues and findings across regions, highlight how "data validation" can be utilized as a springboard to system improvements, and provide information/ updates on current plans, including the soon-to-be-released official monitoring guide.

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Outline

- How did we get here? What are the ***Highlights***?
- What's the approach to ***Federal Monitoring***?
- What are the consistent ***Compliance Issues***?
- What are the consistent ***Areas of Concern***?
- How can these reviews be used as a ***Springboard to System Improvements?***
- ***What's new*** on the horizon for DV?

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Background

- Oversight agencies like GAO and OIG cite data quality issues with ETA's data (2002)
- TEN (Training & Employment Notice) 14-02 issued 5/28/03 announcing the *Data Validation Initiative*
- TEGL (Training & Employment Guidance Letter) 3-03 issued 8/20/03 providing implementation guidance, describing the process, and offering tools
  - "…ETA will monitor the validation effort on a regular schedule."
- Guidance issued annually containing report submission deadlines and source documentation requirements

Background (2)

- **Technical Assistance (TA) Overview**
  - Meetings across regions in 2003/2004 focusing on technical aspects of DV including software
  - DV presentations at nat'l conferences in 2006 and 2007
  - Technical assistance contractor available to support states with software and other technical issues
  - Regional Data Validation Roundtables/Forums
  - Region-specific TA (e.g., using TAT funds)
  - Regular assistance to states provided by regional performance staff

Federal Monitoring
of
Data Validation

In General . . .

- PY 2003/FY 2004 is first validation cycle that could be reviewed by federal staff
- Most regions began monitoring DV after common measures were implemented
- Compliance "playbook"
  - Program Reporting Instructions
  - DV policy guidance and handbooks
  - TEGL 17-05
- Overall objective is data quality (data are accurate and reliable)

Review Approach

- **Where Review Takes Place**
  - Traditional On-Site Review
  - Remote Review
  - Combination
- **Focus of the Review**
  - Program Reporting and DV
  - DV as component of comprehensive review
- **Structure of Review Team**
  - Varies based on regional protocols

Review Scope

- **Programs**
  - Workforce Investment Act (WIA)
  - Trade (TAA)
  - LX (Wagner-Peyser/VETS)
- **Validation Cycles**
  - Most recently completed cycle
  - Additional cycle sometimes included
- **Components**
  1. Report Validation
  2. Data Element Validation
  3. Process Evaluation

Components of Review
Assessment of Report Validation (RV)

- For WIA and LX only – not TAA
  - RV focuses on aggregate calculations
- Did state validate their annual data submission (WIA and LX)?
- How were 'high' error rates addressed?
- Generally completed up front (e.g., before site visit)

Components of Review
Assessment of Data Element Validation (DEV)

- DEV = record review = case file review
- Required across core workforce programs and focuses on data that are used for calculations
- Federal staff revalidate sub-sample of state's sample
  - Random Sample for WIA and TAA
  - All 25 records for LX
- Review data element error rates
- What has the state done with the information?
- On-site review focuses heavily on DEV

Components of Review
Process Evaluation

- Data management and the resultant quality of reported data are derived from and influenced by the policies, procedures and protocols utilized at the state and/or local levels
  - Review of Reporting and Validation Process (including MIS)
  - Review of Policies, Procedures, Protocols (including training) and how deployed

Clarifying Accuracy Standards

- Across the core workforce programs, we have two published error rate thresholds
  1. (LX) No errors allowable for LX DEV (0% errors in the minimum 25-record sample)
  2. (WIA) States submitting annual reports with RV errors that exceed 2% will not be eligible for WIA incentives for that PY (TEGL 9-07 dated 10/10/07)
- We have a *provisional* error rate threshold of 5% for WIA and TAA data elements
  - Error rates exceeding 5% as "Area of Concern" only

Federal Monitoring of Data Validation: One Region's Approach

In ETA Region IV

- **Traditional on-site review (one full week) that includes local office visit**
  - Remote review only if site visit not possible
- **Scope consists of core workforce programs**
  - Two most recent cycles unless prior cycle reviewed
  - "…the organization, data collection, report preparation and data validation work activities of the state and how these activities are managed on a daily basis."

In ETA Region IV (2)

- **Joint ETA/VETS Review Team**
  - Also includes formula FPO and others
- **Process evaluation component begins as soon as review is scheduled and is intensive** (e.g., performance-related policies)
  - Review results inform subsequent program reviews

Consistent "Findings" Across Regions

Source Documentation Incorrect and/or Lacking

- Not using most recent guidance (sources changed)
- Using MIS as allowable source (checkmark or filled-in radio button insufficient by itself)
- Lack of documentation to support service provision (e.g., youth follow up services)

Source Documentation Incorrect and/or Lacking (2)

- Policy includes incorrect sources or combines eligibility documentation with DV source documentation, resulting in incorrect DV sources
- Self-attestation forms signed by case manager, not participant
- Using internal form as "cross-match" with another database

Non-Compliance with EXIT Requirements

- Exit dates not reflective of dates of last service
- Gaps of service spanning years
- Case management used to extend exit date
- Hard exits utilized
  - Date of last contact = Exit date
  - Date of employment = Exit date
- Services provided within 90 days
- Lack of common exit date (across core workforce programs)
- Exit dates not consistent with dates in MIS

This is an ongoing compliance finding across regions and across reviews

Participation Cycles and Dates of Service

- Although there are clear issues around exit, there are also issues around participation cycles and dates of service *in general*
  - Service provision prior to formal participation
  - Staff unclear about services that commence participation
  - Dates of service inconsistent across file and MIS, within MIS, within file, within documents

Incorrect Capture/Coding of Required Data Elements

- Several data elements routinely cited across reviews
  - Ethnicity and Race
  - Veteran Status
  - UI Claimant Status
  - UC Eligible Status
  - School Status at Participation
  - Needy Family Status
  - Dislocation Date

Example:

Ethnicity and race combined (in MIS, on forms, etc.)

No response for ethnicity interpreted as a negative response (MIS default)

Wage Records Not Available for Validation

Two Primary Issues

1. Not accessible due to privacy concerns
2. Data not frozen or archived

Wage Records Not Available
Access to the Data

- **WRIS Data-Sharing Agreement specifies:**
  - Info can be shared with "…auditors who are public employees seeking access to the information in the performance of their official duties."
  - "The PACIA shall permit ETA … to make onsite inspections… for … conducting program audits…"

Wage Records Not Available
Data Not Frozen or Archived

- DV is a point-in-time activity but wage records are dynamic information
  - Federal policy requires the data be frozen or archived to allow federal reviewers to walk in the same footsteps as state validators
  - Federal reviewers cannot utilize a live database
- Because the data have not been kept, there is no audit trail – also a finding (record retention)

Record Retention

Two Primary Issues:

1. Participant files missing, cannot be located, or documents missing
2. Wage records and validation extract files purged or just not kept

Record Retention (2)

- **Wage Record Data**
  - Example: Data periodically purged from state system with DV extract files and documentation
  - "Data validation results and documentation should be retained for at least three years after completion. Retention methods are at the state's discretion and may include an archived database, printed worksheets and reports, or other methods." (DRVS Handbook)

Veterans' Services Issues

- **Coding Errors**
  - Eligible spouse included with TSMs in MIS, which could impact priority of service
  - If individual is a vet, other veteran-related data elements are *required* but State MIS either allows no response or defaults to no
- **Priority of Service**
  - Signage/Policy indicating 180 days of active duty service is needed to be eligible for POS
  - For priority purposes, *only one day of active duty service* is needed

Self-Service Counts Not Reported

- **Not a new requirement**
  - Contained in WIA and LX program reporting instructions and TEGL 17-05

- **In some instances . . .**
  - State MIS for LX doesn't capture the information
  - State has the info "in-house" but it's not reported
- **Reporting self-service counts for WIA and LX participants remains a requirement**
  - …even though self-service participants not included in WIA performance calculations

Consistent

"Areas of Concern"

DEV Error Rates > 5%

- "High" error rates can only be noted as an Area of Concern (at this time)
- Applies to WIA, TAA or both
- In some cases, high error rates continue across validation cycles for same data elements
- What has the state done to eliminate or minimize errors?

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DV Results Not Utilized

- In some instances, results not shared or are only noted during state's out-briefing
- Conducting the required validation for compliance purposes only is a missed opportunity (at best)

- If the intent is data quality, then utilizing the results of annual validation for continuous improvement purposes just makes sense

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Quality of Participant Files

- Lack of consistent file structure
- Documents missing
- Case notes missing, skimpy, illegible, irrelevant
- MIS contains different information
- One file for multiple periods of participation for same individual

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Need for Policies/Procedures

- *Just to report basic metrics*, participant data goes through many steps—gathering, data entry, case management, extract process, data validation, etc.
  - Strong operating policies and procedures are essential at each step to maximize accuracy and minimize confusion
  - *Active* management of the data (state and local levels) is necessary
- Note: Reviews have also highlighted need for policies that are *required* (e.g., youth needing additional assistance)

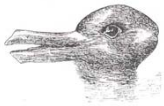
DV Review as Springboard
to
Needed Improvements

Myth: Data Management is Purely Technical

- **Reality: In the end, data management is really about providing the best possible services**
  - Reporting and Validation are there to support effective service provision
    - Accurate reporting is a requirement *but it's also a tool*
  - Staff need to develop a holistic understanding of both data and the real participants and services the data represent

Myth: Data Management is Easy

- **Reality: Data management is HARD!**
  - Business rules are complex and multi-layered
  - Data sets are large and hard to visualize
  - Specs are complex and evolving (!@#$%)
  - Circumstances change



…and sometimes the closer you look, the less clear things become, which is another challenge

Enter: DV Reviews

- **Because these reviews look at the entire system from the bottom up (e.g., how data are collected) and the top down (e.g., state policies), *Program Reporting and Data Validation Reviews* can shine a bright light on necessary improvements**

Got Gaps?

- **Data Validation Reviews can –**
  - Clarify federal policy and expectations
  - Identify policy and procedural gaps
  - Facilitate needed MIS changes, edit checks, adjustments
  - Demonstrate the need for training
  - Highlight ways to improve "regular" monitoring
  - And more!

Moving Forward. . .
What's New? What's Next?

OIG Audit of Federal Monitoring

- OIG Conducted Follow Up Audit in 2008
  - One of five audit questions: Does ETA have an effective monitoring process?
- Draft review guide prepared in 2006 for regional staff but use not mandated
- Required Action: ETA required to finalize monitoring guide

DV Monitoring Guide
Supplement to Core Monitoring Guide

- **Expected shortly as *Supplement* to Core Monitoring Guide**
  - Drafted by performance staff across regions
- **Will be ETA's official guide**
  - Conveys basic requirements but allows regional flexibility

DV Monitoring Guide
Supplement to Core Monitoring Guide (2)

Six Core Activities, each with multiple tasks

1. Prepare for Review
2. Conduct Preliminary Review
3. Conduct Entrance Conference with State
4. Obtain Understanding of State Systems for Reporting and Validation
5. Perform Record Review
6. Conclude Review, Conduct Relevant Follow Up

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Basic Review Requirements

- Assessment of compliance with RV requirements, DEV requirements and DV-related policies and procedures
- Most recent *WIA* validation cycle included
- Regional DEV sub-samples statistically drawn
- Local office visit optional
- Review report completed within 30 days of Exit Conference

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Source Documentation

- **There is a need to revisit, review and – in some cases – revise source documentation requirements**
  - Broad-based workgroup to be established summer of 2011 to tackle the issue
  - Stay tuned!

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DEPARTMENT OF LABOR
ETA

?????

- Although no one can predict the future with certainty, data quality will remain a key factor in decision-making, including funding decisions

U.S. Department of Labor
Employment and Training Administration

Thank you!

www.doleta.gov/performance

Improving Performance Using Data and Data Tools

Improving Performance Using Data and Data Tools

ETA Regional Performance Conferences 2011

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Purpose

- To increase your skills in analysis and interpretation of the participant information you collect
- To increase your ability to report your findings to a variety of audiences
- To learn how to make your analytical results actionable
- To summarize popular resources for data analysis

Basic Steps to Analysis

- Analyze results
- Communicate findings
- Use findings for program improvement

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What's Involved in Analyzing Results?

- Review reports summarizing performance on the common measures, other federal measures, and/or project-specific measures
- Talk to staff and others with first-hand knowledge of the program and its operation
- Generate questions related to the logic of the program design and current environment
- Develop a list of performance issues

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Logic Model Example

Inputs >> Activities >> Outputs >> Outcome >> Impact

Logic models for programs are often more detailed. The logic model illustrated below is for an organization called the Self-Directed Learning Center (SDLC).

Inputs	Activities	Outputs	Short-Term Outcomes	Long-term Outcomes	Impact
- Free articles and other publications on the Web - Collaborators - Free Management Library - Funders - Self-directed learners• - Volunteers - Computers - Web	- Provide peer-assistance models in which learners support each other - Provide free, on-line training program: Basics of Self-Directed Learning - Provide free, on-line training program: Basic Life Skills - Provide free, on-line training program: Passing your GED Exam	- 30 groups that used peer models - 100 completed training programs - 900 learners who finished Basics of Self-Directed Learning - 900 learners who finished Basic Life Skills - 900 learners who passed their GED to gain high-school diploma	- high school diploma for graduates - improved attitude toward self and society for graduates - improved family life for family of graduates	- full-time employment for learners (in job that required high-school education) - increased reliability and improved judgment of learners - enhanced publicity and public relations for SDLC	- independent living for learner (by using salary to rent apartment) - strong basic life skills for learner - improved love life for learner who's now in a relationship - increased likelihood and interest for learner to attend college

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Fishbone Diagram

- "Fishbone diagram" possible contributing or causal factors to each performance issue
- Collect data on the possible contributing or causal factors
- Determine if the factors are correlated with the performance issue

Example: You may find that youth with 3 or more barriers are doing poorly when compared to those youth with fewer barriers. Check to see it there has been a significant increase in youth with 3 or more barriers over time.

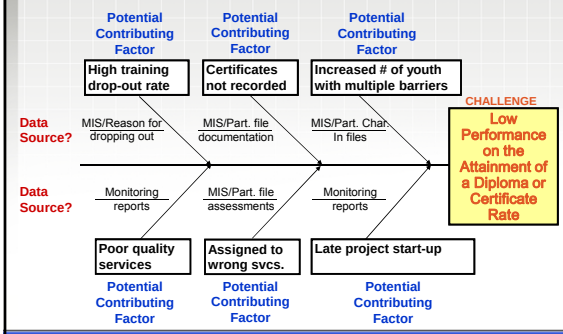
Contributing Factors

You need to determine...

Which factors correlate with success or failure?

Which factors can the organization control?

Fishbone Diagram



Contributing Factors

- Data quality issues
- The characteristics of participants
- The environment
- Management
- The flow of services or the delivery methods

Typical Service Flow

Assessing Performance

Comparisons of negotiated or expected levels of performance with actual levels is only one way to assess performance.

Also consider…

- Before vs. after program comparisons
- Time trend projections
- Comparisons with similar programs

Keep it Simple When Analyzing Results

- Aim for a **systematic** effort
- Keep your audience in mind
- Pay attention to the usability of your analytical report

Two Kinds of Data

- **Qualitative data** are narratives, logs, experiences
  - ✓ Focus groups
  - ✓ Interviews
  - ✓ Open-ended survey items
  - ✓ Case notes
  - ✓ Notes from observations or monitoring reports

→ *Use qualitative data to find themes or patterns*

- **Quantitative data** are numerical, counted, or compared on a scale
  - ✓ Demographic data
  - ✓ Responses to closed-ended items
  - ✓ Performance outcomes
  - ✓ Assessment results

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Examples of Software for Data Analysis

SAS
NCSS
BMDP
STATA
SPSS
StatSoft
WebFOCUS
Minitab

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Using Software for Data Analysis

APPENDIX A: WORKFORCE INVESTMENT ACT TITLE I-B STANDARDIZED RECORD DATA

No.	DATA ELEMENT NAME	DATA TYPE/ FIELD LENGTH	DATA ELEMENT DEFINITION/INSTRUCTIONS	CODE VALUE
SECTION I - INDIVIDUAL INFORMATION				
Special Note: All information contained within this section of the WIASRD must be collected from the individual at the time of participation in the program and should not be updated.				
101	Individual Identifier	AN10	Record the unique identification number assigned to the individual. At a minimum, the identifier for a	000000000X
102	Date of Birth	D T8	Record the individual's date of birth.	YYYYMMDD
103	Gender	IN 1	Record 1 if the person indicates that he is male. Record 2 if the person indicates that she is female. If the person does not self-identify gender, leave "blank" or Record 0.	1 = Male 2 = Female
104	Individual with a Disability	IN 1	Record 1 if the individual indicates that he/she has any "disability" as defined in Section 3(2)(a) of the Americans with Disabilities Act of 1990 (42 U.S.C. 12102). Under that definition, a "disability" is a physical or mental impairment that substantially limits one or more of the persons major life activities. For a definitive and complete definition of "disability" see the ADA statute, in particular, paragraphs (1) and (2) of the definition, at the term "disability" in 29 CFR 1614, the definition section of	1 = Yes 2 = No

Record Layout

```
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AL,100022,5/30/1988,2,0,2,0,0,1,0,0,4,2,3,2,3,2,2,4,1,2,2,8,2,2,2,2,1,4,2,2,1015,
AL,100023,2/18/1990,2,0,2,0,0,1,0,0,4,2,3,2,3,2,2,4,1,2,2,8,2,2,2,2,1,1,2,2,1015,
AL,100025,11/19/1957,1,0,2,0,0,1,0,0,4,2,3,2,3,2,2,4,2,2,2,87,2,3/6/2005,2,2,2,2,
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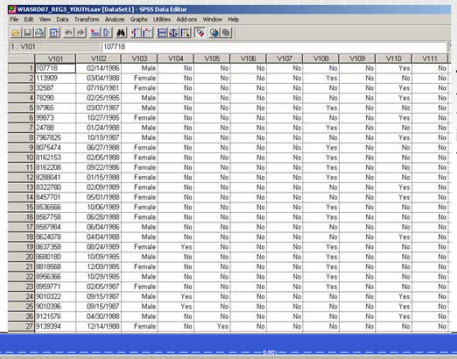
Raw Data

Using Software for Data Analysis



The raw data file is transformed into an SPSS file

Basic Statistics

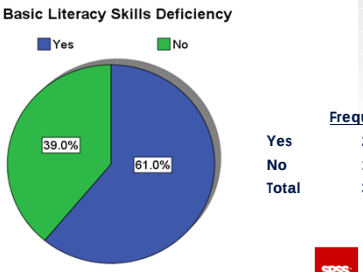
- Measures of central tendency
  - Mean
  - Median
  - Range
- Frequency distributions
- Percentage distributions

Frequency and Percentage Distributions

School Status at Participation		Frequency	Percent	Valid Percent	Cum. Percent
Valid	In-School, HS or Less	16,546	45.0	45.0	45.0
	In-School, Alternative School	481	1.3	1.3	46.3
	In-School, Post-HS	1,098	3.0	3.0	49.3
	Not Attending School, HS Dropout	11,797	32.1	32.1	81.3
	Not Attending School, HS Graduate	6,868	18.7	18.7	100.0
	Total	36,790	100.0	100.0	

Source: PY 06-07 WIASRD submissions for Region 3 states.

Graphing Frequency Distributions



	Frequency	Percent
Yes	22,454	61.0
No	14,336	39.0
Total	36,790	100.0

Range, Mean, Median and Some Subtleties

40	50	55	94	100	100	100

Range: 40-100
Mean: 81
Median: 94

40	45	62	90	94	96	100

Range: 40-100
Mean: 75
Median: 90

Crosstabulation

Let's say you want to know the number of basic skills deficient youth who participated in educational activities. The frequency distributions for the two variables are summarized below.

Basic Literacy Skills Deficiency

	Frequency	Percent
Yes	22,454	61.0
No	14,336	39.0
Total	36,790	100.0

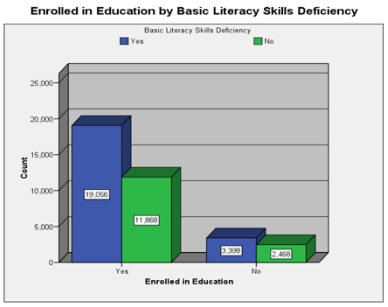
Enrolled in Education

	Frequency	Percent
Yes	30,924	84.1
No	5,866	15.9
Total	36,790	100.0

Crosstabulation

Enrolled in Education by Basic Literacy Skills Deficiency			Basic Literacy Skills Deficiency		
			Yes	No	Total
Enrolled in Education	Yes	Count	19,056	11,868	30,924
		% within Basic Literacy Skills Deficiency	84.9%	82.8%	84.1%
	No	Count	3,398	2,468	5,866
		% within Basic Literacy Skills Deficiency	15.1%	17.2%	15.9%
Total		Count	22,454	14,336	36,790
		% within Basic Literacy Skills Deficiency	100.0%	100.0%	100.0%

Graphing Comparisons



Communicating Findings

"Information that is not effectively shared with others will not be effectively used."

Source: *Building a Successful Evaluation*
Center for Substance Abuse Prevention

Audience

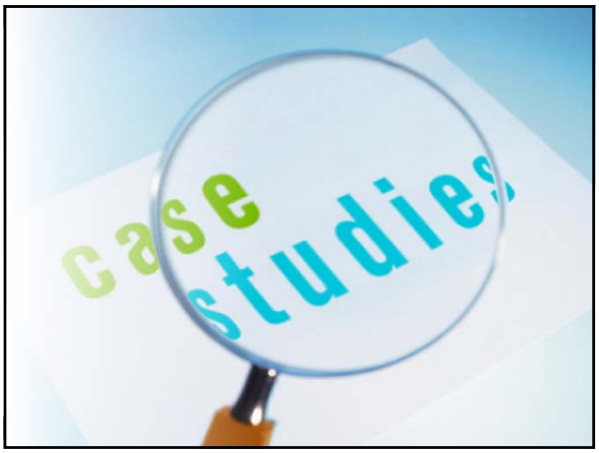
- Staff
- Board
- Funders
- Partners
- Other agencies
- Public

Ways to Deliver Results

- Written report
- Data book
- Flyer
- Formal oral presentation
- Round table with partners/stakeholders
- Poster
- Web site

Whatever Delivery Strategy you Choose:

- Link findings to the program's outputs and desired outcomes
- Include successes and challenges
- Support your claims with data
- Acknowledge knowledge gaps



Case Study using SPSS

- National Literacy/Numeracy Gain Rate = 39.5%
- Analysis tries to answer WHY???
- Use the tool to filter/focus on desired records

Case Study using SPSS

- RESULTS
  - 46.6 % of total exiters didn't take a pre-test or post-test.
  - This represents 77% of the negative outcomes
- Next steps: dig deeper, if necessary
  - Which subjects are most troubling, does waiting until 2nd or 3rd year help?

Data Resources

- Online Resource for Planning and Evaluation
- Bureau of Labor Statistics
- Annual Reports
- U.S. Department of Commerce
- Online Tools for Analyzing Labor Market Data

Online Resource

innovation network
TRANSFORMING EVALUATION FOR SOCIAL CHANGE

http://www.innonet.org/

The Innovation Network is a nonprofit organization sharing planning and evaluation tools and know-how.

Bureau of Labor Statistics

- Current Population Survey (CPS)
- Current Employment Statistics (CES)
- Quarterly Census of Employment and Wages (QCEW)
- Local Area Unemployment Statistics (LAUS)
- Occupational Employment Statistics (OES)
- Mass Layoff Statistics (MLS)

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PY' 08 WIA Summary of Annual Performance Data

Table B- Outcomes for Adults

	Negotiated Performance Level	Actual Performance Level	
Entered Employment Rate	79.9%	69.6%	436,329
			626,539
Employment Retention Rate	83.9%	83.8%	362,992
			433,138
Average Earnings	$11,011	$13,575	$4,785,527,210
			352,521
Employment and Credential Rate	67.6%	71.9%	31,632
			44,000

http://www.doleta.gov/Performance/results/

U.S. Department of Commerce

- Bureau of Economic Analysis (BEA)
- Census Bureau
- Survey of Income and Program Participation
- Local Employment Dynamics (LED)
  - Quarterly Workforce Indicators (QWIs)
  - Industry Focus

Data Tool: CareerOneStop Portal for Labor Market Data

Besides job and resume information, provides state LMI data on:

- Fastest-growing occupations
- Occupations with the most openings
- Occupations with the largest employment
- Occupations with declining employment
- Highest-paying occupations
- Requiring only work experience or on-the-job training
- Requiring post-secondary training
- Requiring a bachelor's degree or higher

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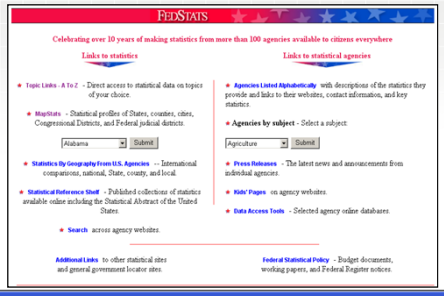
Data Tool: Fedstats

Covers over 100 different federal agencies



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Reference Websites

Bureau of Labor Statistics
- http://www.bls.gov/cps/
- http://www.bls.gov/ces/
- http://www.bls.gov/qcew/
- http://www.bls.gov/lau/
- http://www.bls.gov/oes/
- http://www.bls.gov/mls/

Employment and Training Administration
- http://www.doleta.gov/Performance/results/wia_national_performance.cfm
- http://www.doleta.gov/Performance/goals/gpra.cfm

CareerOneStop Portal
- www.careeronestop.org/workforce/

U.S. Department of Commerce
- http://www.commerce.gov/
- http://www.bea.gov/
- http://lehd.did.census.gov/led/datatools/datatools.html

Fedstats
- http://www.fedstats.gov/

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THANK YOU!!
Happy Analyzing!

Performance 101

United States Department of Labor

WIA Performance & Reporting 101: Common Measures, TEGL 17-05, Reporting Requirements

DOL ETA OPDR DSPP

United States Department of Labor

Employment and Training Administration

Fiscal and Performance Regional Forum

2011

2

Agenda

- Introduction and Background
- Participation, Exit and Related Terminology
- Basic Measurement Rules/Concepts
- Calculating Outcomes on *Adult, DW and Youth* Common Measures

3

Establishing Common Measures

- Effort led by Office of Management and Budget (OMB) as part of President's Management Agenda
  - Linking performance to budget
  - Supporting effective programs
  - Comparing similar programs across agencies
  - *www.whitehouse.gov/omb/budintegration*

Includes six federal Departments

- Labor; Education; Health and Human Services; Veterans' Affairs; Interior; HUD

USDOL/ETA Policy

- Common measures became effective for WIA, W-P and VETS on 7/1/05, and for Trade on 10/1/05
- **Final policy** located in TEGL 17-05, dated 2/17/06, TEGL 17-05 Change 1 dated 8/13/07, TEGL 17-05 Change 2 (Literacy/Numeracy)
  - Rescinds previous policy guidance
    - TEGL 28-04, TEGL 7-99, TEGL 6-00 & 6-00 Change 1
  - Applies to DOL-funded programs *only*

Common Measures Waiver

- ETA has granted a waiver allowing states to implement and report only the common measures instead of the 17 statutory measures.
- As of January 25, 2011 42 states have this waiver.
- Those without the waiver are required to report on the statutorily required 17 measures.

Common Measures: Benefits

✓Focus on the **core purposes** of the workforce system; employment for adults and skill attainment for youth

✓Break down **barriers to integration** resulting from different definitions, data and reports for each workforce program

✓Resolve questions raised by GAO and other oversight agencies regarding **consistency and reliability of data**

✓**Reduce confusion** among customers and stakeholders who want to know about results

Participation, Exit and Related Terminology

"Participant"

- An individual determined eligible to participate in the program who receives a service funded by the program in either a physical location (e.g., One-Stop Center) or remotely through electronic technologies

  Three components:

  1. Determined eligible to participate in the program
  2. Receives a funded service
  3. In either a physical location or through electronic technologies

Clarification of *Participant*

Looking at the pieces (which impact programs differently!)

1. ***Individual determined eligible to participate***
   - Depends on program/funding; doesn't apply in the case of W-P, which is based on universal access
2. ***Receives a service***
   - Not all services trigger participation; it's important to understand the distinction between those that *do* and those that *don't*
3. ***In a physical location or remotely***
   - Adding remote access to the definition is a fundamental change in policy
   - Many substantial services are remotely accessed; this needs to be captured

"Exiter"

- A participant who hasn't received a program or partner-funded service for 90 consecutive days and no future services are scheduled

  - Three components

    1. Hasn't received a service
    2. For 90 consecutive days
    3. No future services scheduled

- Often referred to as a "soft exit approach"

Clarification of *Exiter*

Looking at the pieces (which impact programs differently!)

1. ***The participant hasn't received a service***
   - Could be program- or partner-funded depending on policies/procedures (e.g., tracking)
2. ***For 90 consecutive calendar days***
   - A gap in service can stop the 90-day clock if based on specific/allowable circumstances
3. ***No future services scheduled***
   - Some services can extend the exit date
   - Does not include any follow-up services or circumstances where the participant voluntarily withdraws or drops out of the program

Gaps in Service

- Final common measures policy uses "gap in service" as opposed to the former "planned gap"
- Three allowable circumstances, where the condition exists for at least 90 days
  1. Delay before beginning of training
  2. Health/medical condition of participant/family member
  3. Temporary move from the area that prevents participation
- Gaps in service should be ≤180 days (from date of last service), although a subsequent gap could be initiated as necessary
- All gaps must be documented and are subject to audit

Extending the Exit Date

- Services provided by partner programs can extend the point of exit
  - More services potentially means higher outcomes
  - Requires ability to *track* participants until they exit all services (program and partner)
- **This actually highlights the essence of One-Stop, which is integrated services**
  - No one program or entity can do it all. Only by leveraging limited resources of multiple partners and players can we meet the comprehensive needs of system customers

Other Terms Related to *Exit*

- **Exit Date:** Last date of funded service (program or partner-funded)

Exit Quarter: Calendar quarter containing the exit date

- **Exit Cohort:** Group of individuals who exit during the same calendar quarter

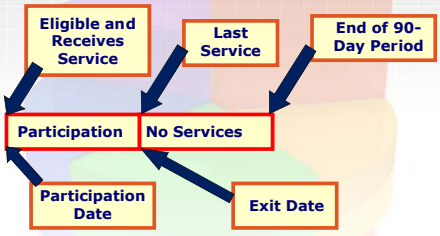
Further Clarification of DATES

- **Participation and Exit Dates are *always* dates of service**
  - Participation Date reflects first funded service
  - Exit Date reflects last funded service
- **Translation of "no more hard exit"**
  - *Not* intended to take responsibility away from case managers; for WIA, case managers do *not* have to wait 90 days, for instance, to begin providing follow-up services
  - However, federal policy states that an *exit* cannot be officially recorded until that 90 days has elapsed
  - One suggestion: It's possible to have a "case closure" code for case managers

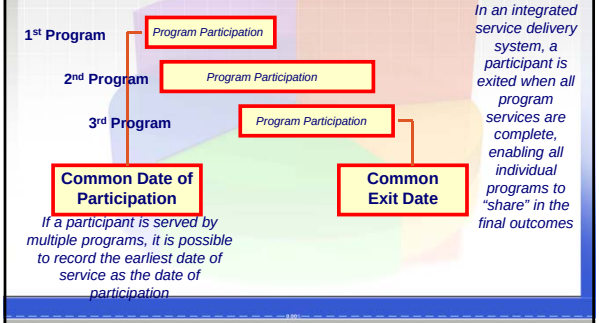
When To Exit

- ***Participants should be exited when the service plan or service strategy is complete***
  - The service plan is a "living document," with additions and changes possible
  - Co-enrollment in different funding streams, additional partner services and a valid gap in service can extend the exit date
- **Participants should *not* be exited after a specific program intervention if additional services are needed**

Illustration: Participation and Exit



Participation and Exit: *A Systems Perspective*



If a participant is served by multiple programs, it is possible to record the earliest date of service as the date of participation

In an integrated service delivery system, a participant is exited when all program services are complete, enabling all individual programs to "share" in the final outcomes

Basic Measurement Rules/Concepts

Overview

- Only participants are included in performance calculations
- Calculations are based on exiters*
- Specific conditions exclude participants from calculations
- Quarters are critical for understanding the measures
- Specific data sources must demonstrate the outcomes

*The one exception is Youth Literacy/Numeracy

Only Participants Included in Performance Calculations

- **From a measurement perspective, an individual doesn't exist until they're considered a participant**
  - It's critical for state and local staff to have the same understanding regarding services that trigger participation, which may be remotely accessed
- **Once a participant *exits*, they are subject to the measures, with exception of Literacy/Numeracy**
  - Translation: 5 of the 6 measures are "exit-based"
  - Exit policies and procedures are critical

Excluding Individuals From Performance Calculations

- **Two basic circumstances in which participants are excluded**
  - Statutory Exclusion applying to WIA (adults receiving only self-service and informational activities are not included in performance calculations)
  - One of six conditions exists either at exit or during the subsequent 3-quarter measurement period
- Note: The term "global exclusions" no longer part of common measures policy

Exclusions (cont'd)

- **Allowable Exclusions**
  - Institutionalized
  - Health/Medical or Family Care
  - Deceased
  - Reservists called to active duty (includes National Guard)
  - Relocated to a residential or non-residential program (applies to youth only)
  - Invalid or missing SSN

Summary of Data Sources

Common Measure	Data Source (s)
Adult Entered Employment Rate	Wage records and supplemental data sources
Adult Employment Retention Rate	Wage records and supplemental data sources
Adult Earnings Change or Average Earnings	Wage records only (except for grantees without current wage record access)
Youth Placement in Employment or Education	Wage records and supplemental data for placement in employment or military; administrative records for placement in education or training
Youth Attainment of Degree or Certificate	Administrative records
Literacy/Numeracy Gains	Assessment instrument

Calculating Outcomes on ADULT Common Measures

ENTERED EMPLOYMENT RATE

- **Definition:** For those not employed at participation, the percentage employed in the 1st quarter after exit
- **Calculation:**

Of those not employed at participation…

$$\frac{\text{Number employed in the 1st quarter after exit}}{\text{Number who exit during the quarter}}$$

Highlights of Adult EER

- ✓Excludes adults employed at participation
- ✓Employment at participation is based on information collected from the individual – *not* wage records
- ✓Those who received a notice of termination or the employer has filed a WARN or similar notice are considered *not employed* and are included in calculations
- ✓Transitioning Service Members (expected to retire within 24 months or separate within 12 months) are considered *not employed* and are included in calculations

EMPLOYMENT RETENTION RATE

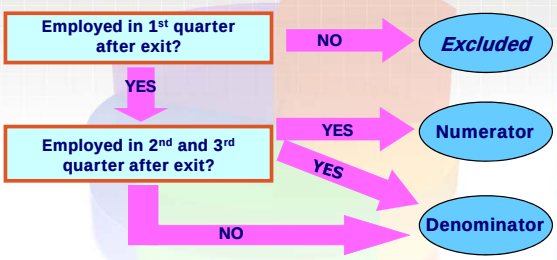
Definition: For those employed in the 1st quarter after exit, the percentage employed in the 2nd *and* 3rd quarter after exit

Calculation:

Of those employed in the 1st quarter after exit…

$$\frac{\text{Number employed in the 2nd and 3rd quarter after exit}}{\text{Number who exit during the quarter}}$$

EMPLOYMENT RETENTION RATE



Highlights of Adult ERR

- ✓Includes <u>all</u> those employed in the 1st quarter after exit regardless of employment status at participation (this is the measurement cohort)
- ✓Positive outcome requires employment in *two* post-exit quarters (which does not have to be with same employer)

AVERAGE EARNINGS

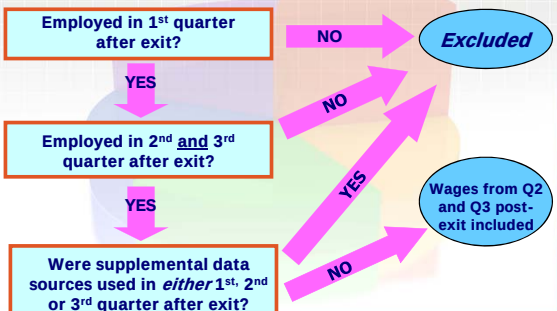
<u>Definition</u>: For those employed in the 1st, 2nd *and* 3rd quarter after exit, average six month earnings in the 2nd *and* 3rd quarter after exit

<u>Calculation</u>:

Of those employed in the 1st, 2nd <u>and</u> 3rd quarters after exit…

$$\frac{\text{Earnings from the 2nd and 3rd quarter after exit}}{\text{Number who exit during the quarter}}$$

AVERAGE EARNINGS



Highlights of Adult Average Earnings

- ✓Includes those employed in 1st, 2nd *and* 3rd quarter after exit, although only wages from the 2nd and 3rd quarters are utilized in the calculations
- ✓Only allowable data source is wage records; no supplemental data*
- ✓Those whose employment was determined based on supplemental data *are excluded* from the earnings measure

*Some DOL-funded programs permit the use of supplemental data *as an interim means* of reporting

Calculating Youth Measures

Clarifying Accountability Youth WIA 7 & CM 3

Implemented in PY 2006

- WIA Statutory Measures

OLDER YOUTH (19-21)
- Entered Employment
- Retention
- Credential Rate
- Earnings Change

YOUNGER YOUTH (14-18)
- Skill Attainment Rate
- Diploma Attainment Rate
- Retention Rate

- Youth Common Measures (14-21)
  - Placement In Employment, Education, Training
  - Attainment of a Degree/Certificate
  - Literacy/Numeracy Gains

Current vs. Common Measures
In General

- States should continue to ensure success with current measures, while transitioning to a focus on common measures
- Major difference between the two sets of measures is the lack of ISY exclusion for placement and certificate common measures
- States should focus on serving ISY who will need program services until graduation/GED attainment
  - Consistent with new youth vision to serve the neediest youth

Youth Common Measures

1. Placement in Employment, Education or Training
2. Attainment of a Degree/Certificate
3. Literacy/Numeracy Gains

NOTE: The measures apply to youth 14-21; no more older/younger distinction!

PLACEMENT IN EMPLOYMENT OR EDUCATION

- **Definition:** Of those not in post-secondary education, employment, or the military at participation, the percentage in employment, the military or enrolled in post-secondary education and/or advanced training/occupational skills training in the 1st quarter after exit

PLACEMENT IN EMPLOYMENT OR EDUCATION

- **Calculation:**

Of those not employed, in the military, or in post-secondary education at participation…

Number of youth employed, in the military or enrolled in post-secondary education and/or advanced training or occupational skills training in the 1st quarter after exit

---

Number of exiters

Highlights of Youth Placement in Employment or Education

- ✓**Excludes youth in employment, the military or post-secondary education at participation**
- ✓**Employment, military and education status at participation is based on information collected from the individual**
- ✓**Employment and military status in the 1st quarter after exit is based on wage records (supplemental data allowed)**
- ✓**Education status in the 1st quarter after exit is based on administrative records**
- ✓**Youth in secondary school at exit are *included,* consistent with ETA's vision to ensure youth successfully complete their secondary education**

Defining Specific Terms

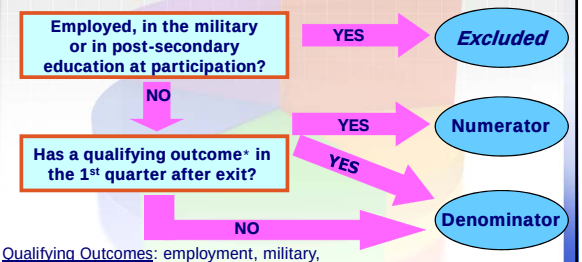
- **Post-Secondary Education** – a program at an accredited degree-granting institution leading to an academic degree. Programs offered by degree-granting institutions that do *not* lead to an academic degree (such as certificate programs) do not count as a placement in post-secondary education but may count as a placement in "advanced training/occupational skills training"

Defining Specific Terms (cont'd)

- **Advanced Training/Occupational Skills Training**
  - An organized program of study that provides specific vocational skills leading to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate or advanced levels. Such training should:
    1. be outcome-oriented and focused on a long-term goal as specified in the ISS,
    2. coincide with exit rather than short-term training
    3. result in attainment of a certificate

Much tighter definition!

PLACEMENT IN EMPLOYMENT OR EDUCATION



Qualifying Outcomes: employment, military, enrolled in post-secondary education, advanced training, or occupational skills training

ATTAINMENT OF DEGREE OR CERTIFICATE

- **Definition:** Of those enrolled in education at or during participation, the percentage who attained a diploma, GED or certificate by the end of the 3rd quarter after exit

ATTAINMENT OF DEGREE OR CERTIFICATE

- **Calculation:**

Of those enrolled in education at participation or any time during the program…

$$\frac{\text{Number of youth who attained a diploma, GED or certificate by the end of the 3rd quarter after exit}}{\text{Number of exiters}}$$

Highlights of Youth Attainment of Degree or Certificate

- ✓**Youth in secondary school at exit are included, which is consistent with ETA's vision to ensure youth successfully complete their secondary education**
- ✓**Diplomas, GEDs or certificates can be obtained during participation or at any point by the end of the 3rd quarter after exit**
- ✓**Work readiness certificates will not be accepted for this measure**

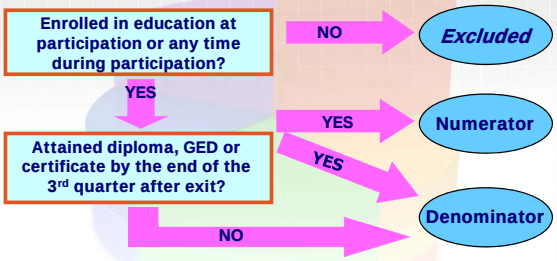
Defining Specific Terms

- **Education** – participation in secondary or post-secondary school, adult education programs, or any other organized program of study leading to a degree or certificate
- **Diploma** – any credential accepted by the State educational agency as equivalent to a HS diploma; also includes post-secondary degrees
- **Certificate** – awarded in recognition of an individual's attainment of technical or occupational skills by *specified* institutions such as the State educational agency or institution of higher education
  - Does *not* include work readiness certificates or certificates awarded by local Boards

Certificates: Approved Awarding Institutions

- A state educational agency, or a state agency responsible for administering vocational and technical education within a state
- Institution of higher education (including community colleges)
- A professional, industry, or employer organization or a product manufacturer or developer
- A registered apprenticeship program
- A public regulatory agency (e.g., FAA aviation mechanic certification)
- A program approved by DVA (Veterans' Affairs) to offer education and training to veterans and other eligible persons under the Montgomery GI Bill
- Office of Job Corps
- Institutions of higher education which are formally controlled, or formally sanctioned or chartered by the governing body of an Indian tribe(s)

ATTAINMENT OF DEGREE OR CERTIFICATE



LITERACY/NUMERACY GAINS

- **Definition:** Of those out-of-school youth who are basic skills deficient, the percentage who increase one or more educational functioning levels within one year of participation

LITERACY/NUMERACY GAINS

- **Calculation:**

Of those out-of-school youth who are basic skills deficient…

Number of youth participants who increase one or more educational functioning levels

---

Number of youth who completed a year of participation (based on date of 1st youth service) **+** Number of youth who exit before completing a year of participation

Highlights of Literacy/Numeracy Gains

- ✓**Only common measure that is not exit-based**
- ✓**Excludes in-school youth and out-of-school youth who are not basic skills deficient**
- ✓**Includes individuals with learning disabilities**
- ✓**A positive outcome means the youth must advance one or more Adult Basic Education (ABE) or English as a Second Language (ESL) functioning levels**
- ✓**Gains can occur in literacy *or* numeracy (programs can pre-test at different levels in each category)**
- ✓**Educational levels are consistent with Department of Education's National Reporting System (NRS)**

Remember this Website!

www.doleta.gov/performance

... your One-Stop portal for program performance and reporting across programs

Quarterly WIASRD Training

Quarterly WIASRD Reporting

United States Department of Labor
Employment and Training Administration
Fiscal and Performance Regional Forum 2011

1

Quarterly WIASRD Reporting

Topic 1 • Background

Topic 2 • Quarterly WIASRD Submissions vs. DRVS Submission

Topic 3 • Quarterly WIASRD Record Layout and Due Dates

Topic 4 • Quarterly WIASRD Submission Process

Topic 5 • Common WIASRD Reporting Errors

2

Background

- TEGL 24-08 – Workforce Investment Act and Wagner-Peyser Performance Accountability Reporting for the ARRA of 2009
  - ETA recognized the need to obtain more robust, "real time" information on program participants and services.
- TEGL 17-09 addressed four key areas:
  - WIASRD reporting frequency,
  - Inclusion of participant files,
  - Submission process, and
  - Updated edit checks

3

DRVS WIASRD vs. Quarterly WIASRD

Quarterly WIASRD

- Includes data not previously included.
- Records for individuals who receive self and informational services only.
- Participants who have not exited.
- Values for a couple of fields are different.

4

Data Reporting and Validation System (DRVS)

- States should only use the current DRVS software:
  - To produce the ETA 9090 (WIA Quarterly Report)
  - To produce the ETA 9091 (WIA Annual Report)
  - To conduct data element validation

DRVS and EBSS Differences

- 100 – Observation number - DRVS creates its own number – state has to create number for USDOL. This is in addition to Individual identifier.
- 309 – Incumbent Worker – DRVS will not take additional code values that were added to the USDOL WIASRD.
- 349 – Received Follow-up – zeroes in Follow-up cause DRVS problems
- 604 – Entered Training Related Employment – Blanks cause DRVS problems
- 605 – Entered Non-Traditional Employment – Blanks cause DRVS problems
  - **NOTE: These differences should only yield WARNING errors in DRVS and/or EBSS.**

EBSS vs. DRVS: 309

- 309 – Incumbent Workers – Change in valid values
  - DRVS
    - 1 = Yes
    - 2 = No
  - EBSS
    - 1 = Primarily Statewide 15% funds
    - 2 = Primarily Local Formula (waiver) funds
    - 3 = Primarily Rapid Response (waiver) funds
    - Blank or 0 = no serviced received

EBSS vs. DRVS: 349

- 349– Received Follow up Services – Blanks cause problems in DRVS.
  - DRVS
    - 1 = Yes
    - 2 = No
    - Blank or 0 = Adult, dislocated worker, NEG, or youth who are still active or who exited within the past year
  - EBSS
    - If YOUTH and WIASRD 303 (Date of Exit) + 12 Months is <= the Report Submittal Date, then WIASRD 349 (Received Follow-up Services) must = 1 or 2

EBSS vs. DRVS: 604

- 604 – Entered Training-Related Employment – Blanks cause problems in DRVS
  - DRVS
    - Must be 1 or 2 if WIASRD 335 (Date Entered Training) has a valid date and WIASRD 601 (Employed in 1st Quarter After Exit Quarter) is 1 [for Adults and Dislocated Workers only].
    - Must be 1 or 2 if WIASRD 601 (Employed in 1st Quarter After Exit Quarter) is 1 [for Older Youth only].
    - Blank or 0 – only valid value for Younger Youth , and Adult/DW/NEG core services only.
  - EBSS
    - If WIASRD 303 (Date of Exit) = Blank, then WIASRD 604 (Entered Training-Related Employment) must = Blank or 0

EBSS vs. DRVS: 605

- 605 – Entered Non-Traditional Employment –Blanks cause problems in DRVS
  - DRVS
    - Must be 1 or 2 if WIASRD 601 (Employed in 1st Quarter After Exit Quarter) is 1.
    - Blank or 0 – only valid value for Younger Youth
  - EBSS
    - If WIASRD 303 (Date of Exit) = Blank, then WIASRD 605 (Entered non-Traditional Employment) must = Blank or 0

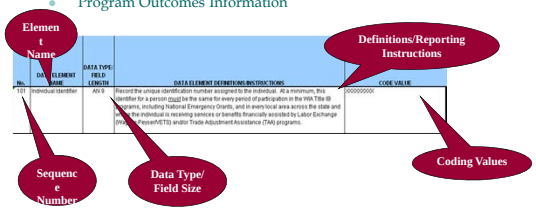
Quarterly WIASRD Data Fields

DRVS Number	WIASRD Number	Data Element Name
1	100	OBS Number
2-198	101-743	All WIASRD Elements
199	744	WIB Name
200	745	Office Name
201	746	Case Manager
202	747	User Field 1
203	748	User Field 2

11

Overview of Record Layout

- WIASRD contains three (3) major sections of data
  - Individual Information
  - Program Activities and Service Information
  - Program Outcomes Information



Data Element Numbers	Section # and Description
100-131	Section I - Individual Information
	Section II – Program Activities and Services Information
301-327	Section IIA – Program Participation Data
328-342	Section IIB - Services and Other Related Assistance Data
343-349	Section IIC - Additional Youth Services Data
	Section III – Program Outcomes Information
601-611	Section IIIA – Employment and Job Retention Data
612-618	Section IIIB – Wage Record Data
619-672	Section IIIC – Education, Credential, and Skill Attainment Data
701-743	Section IIID – Additional Youth L/N Assessment Data

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Valid WIASRD Values for Participants Who Have Not Exited

WIASRD Field Number	WIASRD Field Name	Valid Values
303	Date of Exit	Blank or 0
327	Other Reasons for Exit	Blank or 00
349	Received Follow Up Services	Blank or 0
601	Employed in 1st Quarter After Exit	3
602	Type of Employment Match 1st Quarter After Exit Quarter	6
603	Occupational Code	Blank or 0
604	Entered Training Related Employment	Blank or 0
605	Entered non-Traditional Employment	Blank or 0
606	Employed in 2nd Quarter After Exit	3
607	Type of Employment Match 2nd Quarter After Exit Quarter	6
608	Employed in 3rd Quarter After Exit Quarter	3
609	Type of Employment Match 3rd Quarter after Exit Quarter	6
610	Employed in 4th Quarter After Exit Quarter	3
611	Type of Employment Match 4th Quarter After Exit Quarter	6
615	Wages 1st Quarter After Exit Quarter	999999.99
616	Wages 2nd Quarter After Exit Quarter	999999.99
617	Wages 3rd Quarter After Exit Quarter	999999.99
618	Wages 4th Quarter After Exit Quarter	999999.99
670	School Status at Exit	Blank or 0
671	Youth Placement Information	Blank or 0
672	Youth Retention Information	Blank or 0

Self-Service Only Individual Record Data

- Self-service only participants will be separated from the main file and a limited set of edits will be applied
- Separating the WIASRD file reduces the overall processing time and reduces the likely hood of unnecessary "warning" and "reject" error messages

Identifying Self-Service Only Records

- WIASRD 331 (Received Core Self Services and Informational Services) =1 and
- WIASRD 332 (Date of First Staff Assisted Core Service) = Blank, and
- WIASRD 334 (Date of First Intensive Service) = Blank, and
- WIASRD 335 (Date Entered Training) = Blank

Due Dates and Cohorts

Program Year and Quarter	Quarter End Date	Due Date	Exiter Cohort	Participant Cohort
PY 2010 Q3	3/31/2011	5/16/2011	10/1/2008 -12/31/2010	1/1/2010 - 3/31/2011
PY 2010 Q4	6/30/2011	9/15/2011	1/1/2009 - 3/31/2011	4/1/2011 - 6/30/2011
PY 2011 Q1	9/30/2011	11/15/2012	4/1/2009 – 6/30/2011	7/1/2011 - 9/30/2011
PY 2011 Q2	12/31/2011	2/15/2012	7/1/2009 – 9/30/2011	10/1/2011 -12/31/2011

Should the due date fall on a Saturday or Sunday the due date is the following Monday

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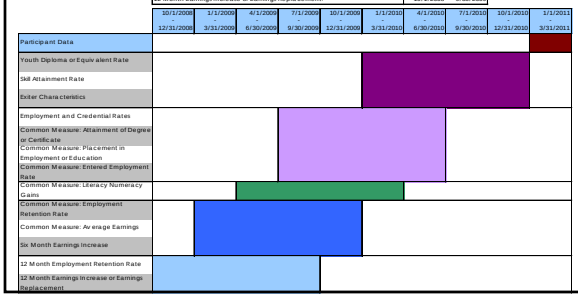
Relevant Periods of Exiters and Participants to be Included in:

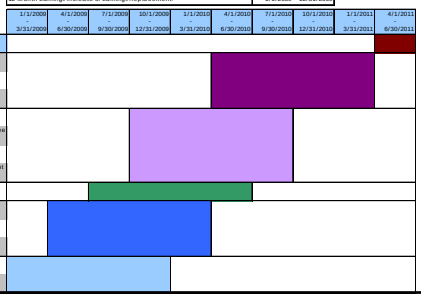
Program Year: 2010 Program Quarter: 3

Measure	Start	End
Participant Data:	1/1/2011	3/31/2011
Youth Diploma or Equivalent Rate:	1/1/2010	12/31/2010
Skill Attainment Rate:	1/1/2010	12/31/2010
Exiter Characteristics	1/1/2010	12/31/2010
Employment and Credential Rates:	7/1/2009	6/30/2010
Common Measure: Attainment of Degree or Certificate:	7/1/2009	6/30/2010
Common Measure: Placement in Employment or Education:	7/1/2009	6/30/2010
Common Measure: Entered Employment Rate:	7/1/2009	6/30/2010
Common Measure: Literacy Numeracy Gains:	4/1/2009	3/31/2010
Common Measure: Employment Retention Rate:	1/1/2009	12/31/2009
Common Measure: Average Earnings:	1/1/2009	12/31/2009
Six Month Earnings Increase:	1/1/2009	12/31/2009
12 Month Employment Retention Rate:	10/1/2008	9/30/2009
12 Month Earnings Increase or Earnings Replacement:	10/1/2008	9/30/2009



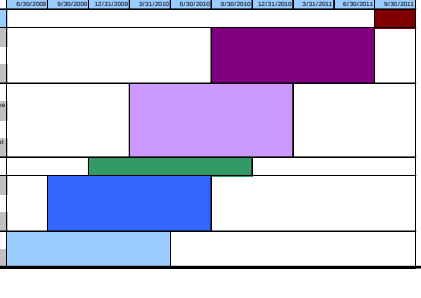
Relevant Periods of Exiters and Participants to be Included in:			
Program Year:	2010	Program Quarter:	4

Measure	Start	End
Participant Data:	4/1/2011	6/30/2011
Youth Diploma or Equivalent Rate:	4/1/2010	3/31/2011
Skill Attainment Rate:	4/1/2010	3/31/2011
Exiter Characteristics:	4/1/2010	3/31/2011
Employment and Credential Rates:	10/1/2009	9/30/2010
Common Measure: Attainment of Degree or Certificate:	10/1/2009	9/30/2010
Common Measure: Placement in Employment or Education:	10/1/2009	9/30/2010
Common Measure: Entered Employment Rate:	10/1/2009	9/30/2010
Common Measure: Literacy Numeracy Gains:	7/1/2009	6/30/2010
Common Measure: Employment Retention Rate:	4/1/2009	3/31/2010
Common Measure: Average Earnings:	4/1/2009	3/31/2010
Six Month Earnings Increase:	4/1/2009	3/31/2010
12 Month Employment Retention Rate:	1/1/2009	12/31/2009
12 Month Earnings Increase or Earnings Replacement:	1/1/2009	12/31/2009



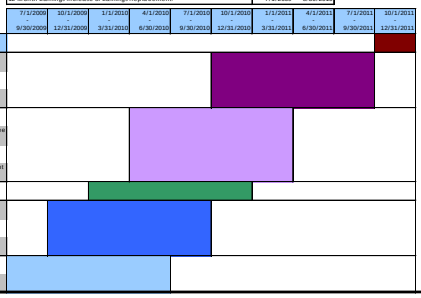
Relevant Periods of Exiters and Participants to be Included in:			
Program Year:	2011	Program Quarter:	1

Measure	Start	End
Participant Data:	7/1/2011	9/30/2011
Youth Diploma or Equivalent Rate:	7/1/2010	6/30/2011
Skill Attainment Rate:	7/1/2010	6/30/2011
Exiter Characteristics:	7/1/2010	6/30/2011
Employment and Credential Rates:	1/1/2010	12/31/2010
Common Measure: Attainment of Degree or Certificate:	1/1/2010	12/31/2010
Common Measure: Placement in Employment or Education:	1/1/2010	12/31/2010
Common Measure: Entered Employment Rate:	1/1/2010	12/31/2010
Common Measure: Literacy Numeracy Gains:	10/1/2009	9/30/2010
Common Measure: Employment Retention Rate:	7/1/2009	6/30/2010
Common Measure: Average Earnings:	7/1/2009	6/30/2010
Six Month Earnings Increase:	7/1/2009	6/30/2010
12 Month Employment Retention Rate:	4/1/2009	3/31/2010
12 Month Earnings Increase or Earnings Replacement:	4/1/2009	3/31/2010



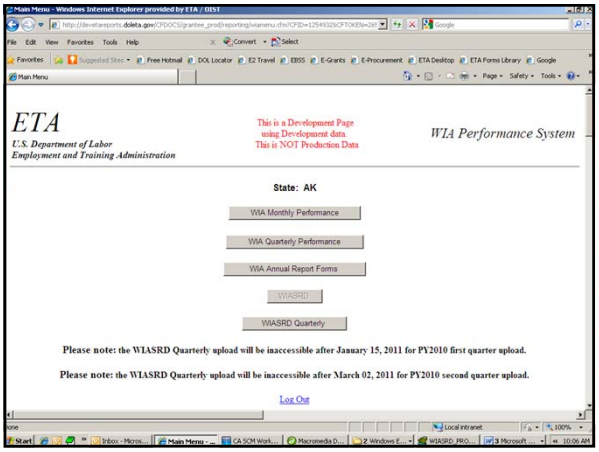
Relevant Periods of Exiters and Participants to be Included in:			
Program Year:	2011	Program Quarter:	2

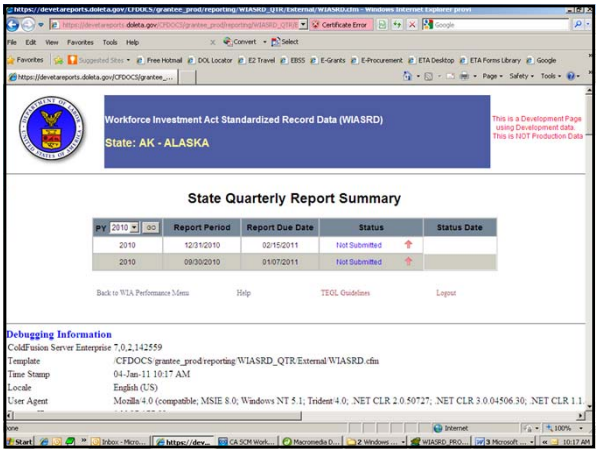
Measure	Start	End
Participant Data:	10/1/2011	12/31/2011
Youth Diploma or Equivalent Rate:	10/1/2010	9/30/2011
Skill Attainment Rate:	10/1/2010	9/30/2011
Exiter Characteristics:	10/1/2010	9/30/2011
Employment and Credential Rates:	4/1/2010	3/31/2011
Common Measure: Attainment of Degree or Certificate:	4/1/2010	3/31/2011
Common Measure: Placement in Employment or Education:	4/1/2010	3/31/2011
Common Measure: Entered Employment Rate:	4/1/2010	3/31/2011
Common Measure: Literacy Numeracy Gains:	1/1/2010	12/31/2010
Common Measure: Employment Retention Rate:	10/1/2009	9/30/2010
Common Measure: Average Earnings:	10/1/2009	9/30/2010
Six Month Earnings Increase:	10/1/2009	9/30/2010
12 Month Employment Retention Rate:	7/1/2009	6/30/2010
12 Month Earnings Increase or Earnings Replacement:	7/1/2009	6/30/2010

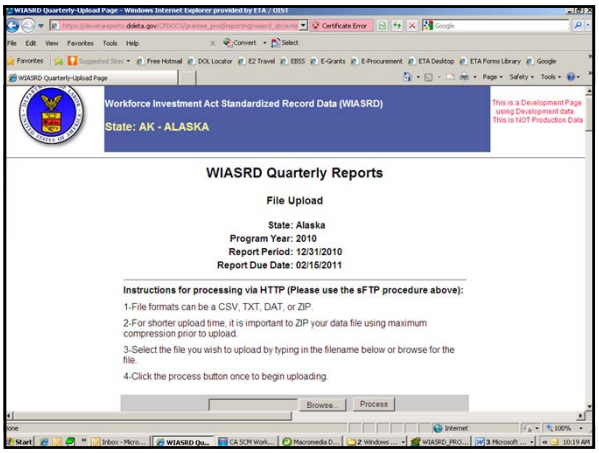


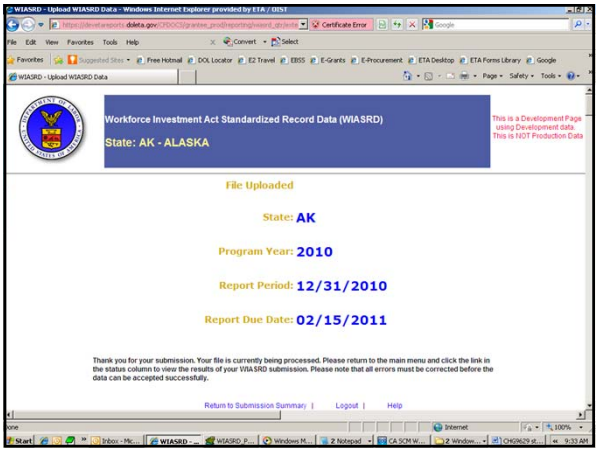
Quarterly WIASRD Submission Process

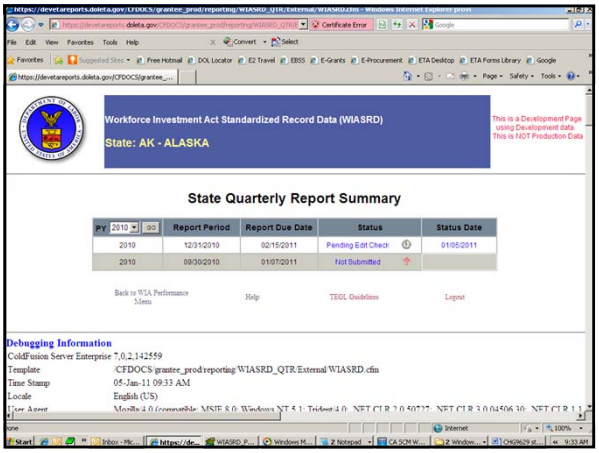
- Large WIASRD files should be zipped
- Files formatted incorrectly will be rejected
- 50,000 Max warning
- Files containing reject records will not be accepted






WIASRD Quarterly-Upload Page - Windows Internet Explorer provided by ETA / OIST
Workforce Investment Act Standardized Record Data (WIASRD)
State: AK - ALASKA
This is a Development Page using Development data. This is NOT Production Data
WIASRD Quarterly Reports
File Upload
State: Alaska
Program Year: 2010
Report Period: 12/31/2010
Report Due Date: 02/15/2011
Instructions for processing via HTTP (Please use the sFTP procedure above):
1-File formats can be a CSV, TXT, DAT, or ZIP.
2-For shorter upload time, it is important to ZIP your data file using maximum compression prior to upload.
3-Select the file you wish to upload by typing in the filename below or browse for the file.
4-Click the process button once to begin uploading.
Browse...
Process


WIASRD - Upload WIASRD Data - Windows Internet Explorer provided by ETA / OIST
Workforce Investment Act Standardized Record Data (WIASRD)
State: AK - ALASKA
This is a Development Page using Development data. This is NOT Production Data
File Uploaded
State: AK
Program Year: 2010
Report Period: 12/31/2010
Report Due Date: 02/15/2011
Thank you for your submission. Your file is currently being processed. Please return to the main menu and click the link in the status column to view the results of your WIASRD submission. Please note that all errors must be corrected before the data can be accepted successfully.
Return to Submission Summary | Logout | Help


Workforce Investment Act Standardized Record Data (WIASRD)
State: AK - ALASKA
This is a Development Page using Development data. This is NOT Production Data
State Quarterly Report Summary
PY 2010 GO
Report Period
Report Due Date
Status
Status Date
2010 12/31/2010 02/15/2011 Pending Edit Check 01/05/2011
2010 09/30/2010 01/07/2011 Not Submitted
Back to WIA Performance Menu
Help
TEGL Guidelines
Logout
Debugging Information
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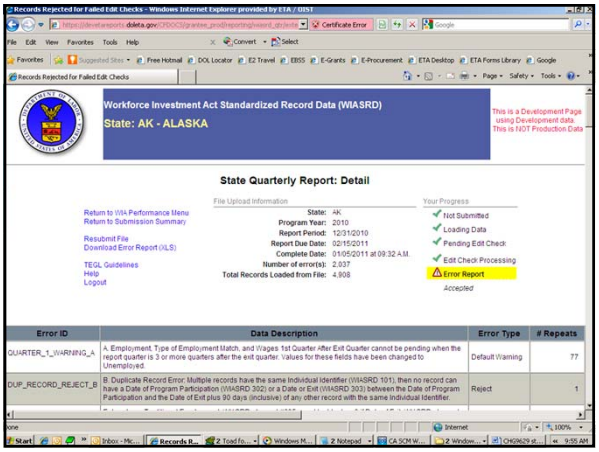
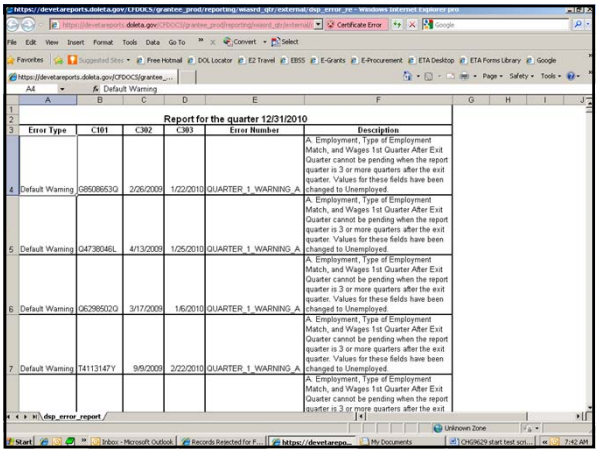
Time Stamp 05-Jan-11 09:33 AM
Locale English (US)

Workforce Investment Act Standardized Record Data (WIASRD)
State: AK - ALASKA
This is a Development Page using Development data. This is NOT Production Data
State Quarterly Report Summary
PY 2010
Report Period
Report Due Date
Status
Status Date
2010 12/31/2010 02/15/2011 Error Report 01/05/2011
2010 09/30/2010 01/07/2011 Not Submitted
Back to WIA Performance Menu
Help
TEGL Guidelines
Logout
Debugging Information
ColdFusion Server Enterprise 7,0,2,142559
Template CFDOCS/grantee_prod/reporting/WIASRD_QTR/External/WIASRD.cfm
Time Stamp 05-Jan-11 09:55 AM
Locale English (US)


Workforce Investment Act Standardized Record Data (WIASRD)
State: AK - ALASKA
This is a Development Page using Development data. This is NOT Production Data
State Quarterly Report: Detail
Return to WIA Performance Menu
Return to Submission Summary
Resubmit File
Download Error Report (XLS)
TEGL Guidelines
Help
Logout
File Upload Information
State: AK
Program Year: 2010
Report Period: 12/31/2010
Report Due Date: 02/15/2011
Complete Date: 01/05/2011 at 09:32 A.M.
Number of error(s): 2,037
Total Records Loaded from File: 4,908
Your Progress
Not Submitted
Loading Data
Pending Edit Check
Edit Check Processing
Error Report
Accepted
Error ID
Data Description
Error Type
Repeats
QUARTER_1_WARNING_A
A. Employment, Type of Employment Match, and Wages 1st Quarter After Exit Quarter cannot be pending when the report quarter is 3 or more quarters after the exit quarter. Values for these fields have been changed to Unemployed.
Default Warning
77
DUP_RECORD_REJECT_B
B. Duplicate Record Error: Multiple records have the same Individual Identifier (WIASRD 101), then no record can have a Date of Program Participation (WIASRD 302) or a Date or Exit (WIASRD 303) between the Date of Program Participation and the Date of Exit plus 90 days (inclusive) of any other record with the same Individual Identifier.
Reject
1


Report for the quarter 12/31/2010
Error Type
C101
C302
C303
Error Number
Description
Default Warning G85086530 2/26/2009 1/22/2010 QUARTER_1_WARNING_A
Default Warning Q4738046L 4/13/2009 1/25/2010 QUARTER_1_WARNING_A
Default Warning Q6298502Q 3/17/2009 1/6/2010 QUARTER_1_WARNING_A
Default Warning T4113147Y 9/9/2009 2/22/2010 QUARTER_1_WARNING_A
A. Employment, Type of Employment Match, and Wages 1st Quarter After Exit Quarter cannot be pending when the report quarter is 3 or more quarters after the exit quarter. Values for these fields have been changed to Unemployed.

Common WIASRD Issues

- Missing/incomplete data for services and other related assistance data
  - Section II.B (fields 328-349)
- Occupational skills training code, field 342
  - Enter the O*NET code
  - http://online.onetcenter.org
- Type of Recognized Credential, field 619
- The occupation of the job held in the quarter after exit is frequently missing, field 603

Common WIASRD Issues

- Distinguishing between yes =1, no =2, and unknown = 0 or 'blank'
  - For example, the data for training-related employment (WIASRD field 604) indicates a very low percentage of employment is related to the training provided.
  - Are local areas reporting "no" (2) when they really do not know (0 or blank)?

Literacy/Numeracy Gains

Achieving Successful Outcomes

Literacy/Numeracy Gains

Overview

Important definitions

Information about assessments

Highlights of the measure

Calculating the measure

Keys to improving literacy/numeracy skills

2

WHERE'S THE GUIDANCE

TEGL 17-05: Common Measures Policy for ETA Performance Accountability System and Related Performance Issues replaces the existing guidance with a single unified document.

TEGL 17-05, Change 2: The intent of this guidance is to further clarify the application of the literacy/numeracy measure initially provided in Attachment C, Educational Functional Level Descriptors, in Training and Employment Guidance Letter (TEGL) 17-05, issued February 17, 2006, and to rescind TEGL 17-05, Change 1, issued August 13, 2007. This change TEGL only addresses specific reporting changes for the Workforce Investment Act (WIA) Youth literacy/numeracy measure.

TEGL 3-03, Change 3: This TEGL provides revisions and clarifications to policy guidance previously issued to states and national program grantees concerning ETA data validation policy.

3

Literacy/Numeracy Gains

Of those ***out-of-school youth*** who are ***basic skills deficient***, the percentage who increase one or more ***educational functioning levels*** within one year of participation.

4

Definitions

Out-of-School Youth

High School Dropout (no diploma or equivalent)

High School Graduate (or equivalency) not in postsecondary

High School Graduate (or equivalency) in postsecondary – but basic skills deficient

5

Definitions

Basic Skills Deficient

The youth computes or solves problems, reads, writes, or speaks English at or below the eighth grade level or is unable to perform these tasks at a level necessary to function on the job, in the individual's family, or in society.

States and grantees may develop their own definition, but it must include the language above.

6

Definitions

Educational Functioning Level (EFL)

From Department of Education, Office of Vocational and Adult Education, National Reporting System (NRS)

EFL	ABE	ESL	Basic Skill Deficient
1		Beginning ESL Literacy	Basic Skill Deficient
2		Low Beginning ESL	
3	Beginning ABE Literacy	High Beginning ESL	
4	Beginning Basic Education	Low Intermediate ESL	
5	Low Intermediate Basic Education	High Intermediate ESL	
6	High Intermediate Basic Education	Advanced ESL	
7	Low Adult Secondary Education	Exit ESL	Not Basic Skill Deficient
8	High Adult Secondary Education		

7

About the Assessments

Approved Assessment Instruments:

See National Reporting System (NRS) Implementation Guidelines to determine current approved assessments, found at: http://www.nrsweb.org/docs/ImplementationGuidelines.pdf.

Latest NRS Implementation Guidelines issued in March 2010:

TABE, CASAS, Wonderlic GAIN, MAPT, WorkKeys

For ELL- CASAS, BEST Plus, BEST Literacy, TABE CLAS-E

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About the Assessments

All out-of-school youth must be assessed in basic reading, writing and math

Pre-testing must occur within 60 days of the first youth program service; can use pre-test from up to six months prior to date of first youth service

The same standardized assessment must be used for pre- and post-testing

Youth should be post-tested by the end of one year of participation and compared to pre-test results obtained during initial assessment

9

About the Assessments

If a youth continues to be basic skills deficient after the first 12 months of participation, they should continue to receive training in literacy and/or numeracy skills

Youth should be post-tested and included in the measure at the completion of the 2nd year only if they complete two full years in the program

10

Highlights of Literacy/Numeracy Gains

Based on date of first youth service (not exit based)

Youth participants may be included for up to 3 years if they remain Basic Skills Deficient

Participant is included in the measure even if they exit prior to end of the first year

Includes individuals with learning disabilities

Excludes in-school youth and out-of-school youth who are not basic skills deficient

Gains can occur in literacy or numeracy (programs can pre-test at different levels in each category)

11

Literacy/Numeracy Gains 1st Year of Participation

Of those out-of-school youth who are basic skills deficient, the percentage who increase one or more educational functioning levels within one year of participation

$$\frac{\text{Number of youth participants who increase one or more educational functioning levels}}{\text{Number of youth who completed a year of participation (based on date of 1st youth service)} + \text{Number of youth who exit before completing a year of participation}}$$

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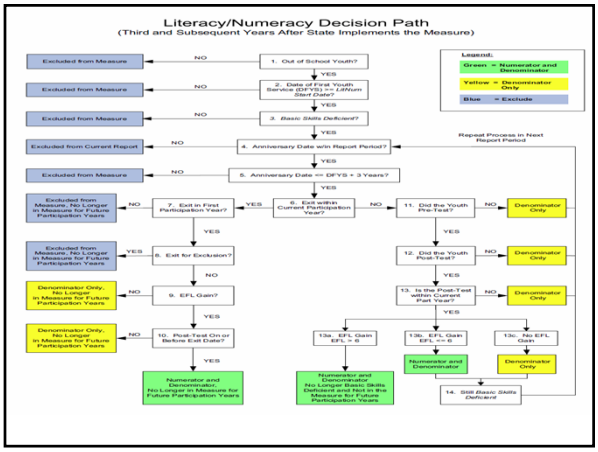
Literacy/Numeracy Gains
2nd and 3rd Years of Participation

Of those out-of-school youth who are basic skills deficient, the percentage who increase one or more educational functioning levels within one year of participation

Number of youth participants who increase one or more educational functioning levels

Number of youth who completed a second or third full year of participation (based on anniversary date of 1st youth service)

13



Keys to Success

Improving Literacy and Numeracy

Oversight Approach

- Continual training to Youth Service Providers
- Regular use of Management Reports
- MIS reminders
- Engage Partners
- Performance-Based Contracts

16

Youth Engagement Strategies

- Keep Youth connected to an organization or program
- Provide Incentives
- Youth-centered Programs

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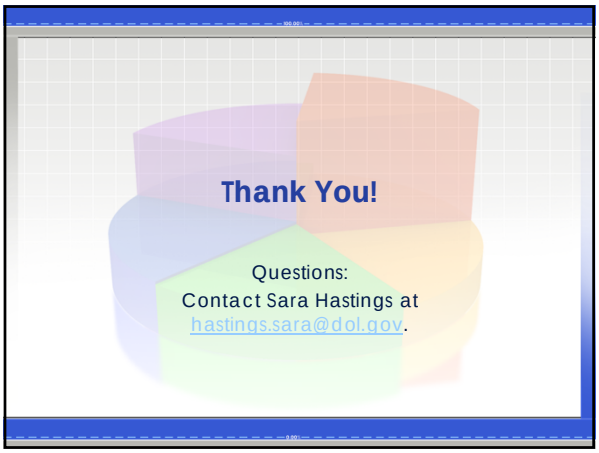
Youth Engagement Strategies

- Smaller learning communities
- Applied learning
- Personal attention by caring adults
- Well-trained staff

18


Thank You!
Questions:
Contact Sara Hastings at
hastings.sara@dol.gov.

Credentials and Certificates

Achieving Successful Outcomes

Credentials and Certificates

CREDENTIALS and CERTIFICATES

DEFINITION AND STRATEGIES

Why Postsecondary Credentials

President Obama's Goal
- Every American completes one year of postsecondary
- U.S. leads the world in percentage of college graduates

Restore Economic Competitiveness
- Labor market projections on skill demands

Reduce Income Inequality
- Skills gap = income gap

High Priority Goal for Credentials

By June 2012, increase by 10 percent (to 220,000) the number of people who receive training and attain a degree or certificate through the following programs: WIA adult, dislocated worker, and youth, National Emergency Grants (NEGS), Trade Adjustment Assistance (TAA), and Career Pathways.

Why are Credentials Beneficial

Improve labor market outcomes for individuals

- Employment: Significant differences in unemployment rates (5%)
- Earnings: Differentials of 33% for Associates degrees and 62% for Bachelor's degrees.
- Women and minorities – increased gains from credentials

Credentials

TEGL 15-10 established 'credential' as the umbrella term encompassing postsecondary degrees, diplomas, licenses, certificates, and certifications.

All states, regardless of waiver, must collect information on credential attainment in the WIASRD

- Section IIIC of the record layout

Credentials Defined

Awarded in recognition of an individual's attainment of measurable technical or occupational skills necessary to obtain employment or advance within an occupation.

Work Readiness Credentials and those awarded by workforce investment boards are NOT included in this definition.

Credentials: Approved Awarding Institutions

- A state educational agency, or a state agency responsible for administering vocational and technical education within a state
- Institution of higher education (including community colleges)
- A professional, industry, or employer organization or a product manufacturer or developer
- A registered apprenticeship program
- A public regulatory agency (e.g., FAA aviation mechanic certification)
- A program approved by DVA (Veterans' Affairs) to offer education and training to veterans and other eligible persons under the Montgomery GI Bill
- Office of Job Corps
- Institutions of higher education which are formally controlled, or formally sanctioned or chartered by the governing body of an Indian tribe(s)

Occupational Licenses

- Granted by Federal, state or local governmental agencies;
- Mandatory in the relevant jurisdiction;
- Intended to set professional standards and ensure safety and quality of work, such as medical licenses for doctors;
- Required in addition to other credentials (educational awards, apprenticeship, or certification);
- Defined by laws and regulations;
- Time-limited - occupational licenses must be renewed based on meeting on-going requirements to maintain the license; and
- Violation of the terms of the license can result in legal action.

Personnel Certifications

- Granted by third-party non-governmental agencies - usually associations, and by companies;
- Intended to set professional standards for qualifications, such as a certification for a crane operator, or a Novell Network Certified Engineer;
- The standards for certifications are not defined by government laws or regulations;
- Usually require successful completion of an examination or assessment, which indicates mastery of competencies as measured against a defensible set of standards

Major Accreditation Organizations for Personnel Certifications

The American National Standards Institute (ANSI)

- Provides accreditation of personnel certifications and certificates
- Maintains a Directory of Accredited Personnel (ANSI/ISO/IEC 17024) Certification Bodies, Applicants and Suspended Certification Bodies available online

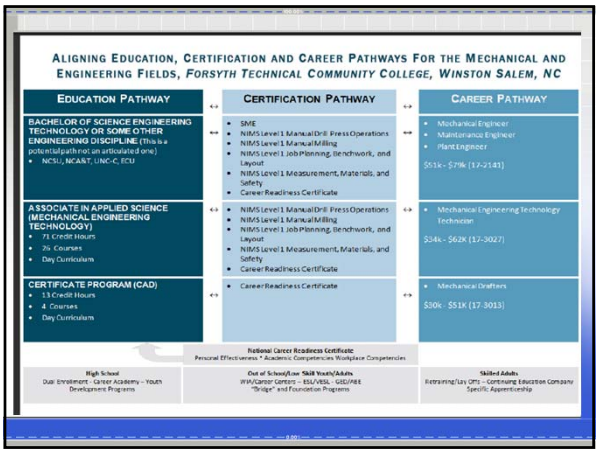
The Institute for Credentialing Excellence (ICE)/ National Commission for Certifying Agencies (NCCA)

- Provides accreditation of personnel certifications and certificates
- Maintains a listing of Accredited Certification Programs at: ICE/NCCA also has recently begun a program to accredit Personnel Certificates

Current Models of Existing Industry-Recognized Stackable Credentials

Advanced Manufacturing

- The Manufacturing Institute has endorsed a Manufacturing Skills Certification System
- To be implemented through community colleges to enable participants to advance along a manufacturing career pathway
- Beginning at entry level work readiness and employability skills up into specific technical competencies associated with specific types of manufacturing.



Current Models of Existing Industry-Recognized Stackable Credentials

State-Level Projects

Oregon has developed an interactive web-based tool that allows students and workers to chart a career path and identify the necessary educational and labor market credentials necessary to advance along it.

For more information on Oregon's statewide approach to increasing credential attainment, see the Worksource Oregon website.

Attainment of Degree/Certificate Youth Common Measure

Of those enrolled in education at or during participation, the percentage who attained a diploma, GED or certificate by the end of the 3rd quarter after exit

$$\frac{\text{Number of youth who attained a diploma, GED or certificate by the end of the 3rd quarter after exit}}{\text{Number of youth exiters}}$$

Credential Rate
Statutory Older Youth Measure

Of all Older Youth participants:

Number of older youth participants who are either employed, in post-secondary education, or in advanced training/advanced training-occupational skills training in the first quarter after exit AND received a credential by the end of the third quarter after exit.

Number of older youth participants who exited during the quarter

Employment and Credential Rate
Statutory Adult Measures

Of those Adults who received Training Services:

Number of adult participants who were employed in the first quarter after exit AND received a credential by the end of the third quarter after exit

---

Number of adult participants who exited during the quarter

Employment and Credential Rate
Statutory Dislocated Worker Measure

Of those Dislocated Workers who received Training Services:

Number of dislocated workers participants who were employed in the first quarter after exit AND received a credential by the end of the third quarter after exit

---

Number of dislocated worker participants who exited during the quarter

Strategies: Increasing Completion

Design around Needs of "Working Learners"

- Contextualization
- Flexible Scheduling
- Flexible Delivery (on-line, workplace, etc)

Strategies: Increasing Completion

Shorten Time to Credential Attainment

- Integrating Basic Skills Education and Training
- Credit for Prior Learning
- Accelerated program designs
- Chunking/Modularization

Strategies: Increasing Completion

Provide Extensive Wrap-Around Services

- Support Services (Transportation/Child Care)
- Financial Aid (Pell)
- TANF/SNAP Funds
- Academic/Career Advising – Career Pathways
- Job Placement/ Internships
- Cohort learning/Peer Mentoring (requires significant cross-agency collaboration)

Strategies: Ensuring Quality

- Use LMI to identify/ track in-demand skills
- Survey employers to learn about skills needs and credential preferences
- Leverage ETPL to ensure training programs result in industry-recognized credentials
- Build staff capacity on LMI and career/academic counseling
- Provide visual roadmaps and other tools to help participants invest wisely

Service Strategies for Increasing Credential Attainment

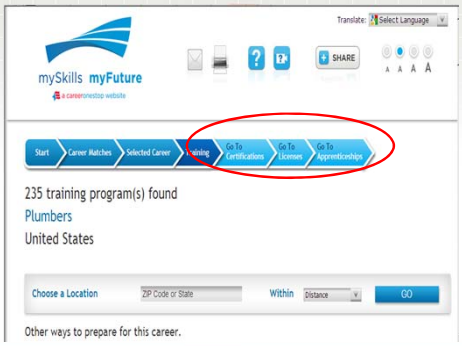
Registered Apprenticeship

- Is a form of "On-the-Job Training" that combines structured classroom instructions with hand-on practical application and skill acquisition.
- Offers skill development, competency-based training system, and interim credentials in high growth, high demand industries.
- Coordinates with industry leaders to define competency models; models used to provide quantifiable skills and portable industry-recognized credentials that meet business needs and requirements.

Tool for Identifying Credentials- www.careeronestop.org

Tool for Identifying Credentials- www.mySkillsmyFuture.org

Certifications, Licenses, Apprenticeships



Questions??

Thanks!

Veterans and the Public Workforce System

Veterans in the Labor Force

2010 BLS Data

- The median age of unemployed veterans is 50, while the median age unemployed non-veterans is 35
- Unemployment rates for veterans 35-39 and 40-44 years old were lower than rates for non-veterans in same age groups
  - In all other age groups, unemployment rates for non-veterans were lower (i.e., 18-34, 45+)

4

Veterans at One-Stops

- In 2010, over half (58%) of veterans served were 45 or older whereas two-thirds (68%) of non-veterans served were 18-44 years old
- Among veterans served, there are differences in the Entered Employment Rate
  - 49% for those 18-44 years old
  - 40% for those 45+
- It's been known for some time that younger veterans struggle in the labor market but it's become clear since the recent recession that older veterans also struggle in the labor market

5

Key Differences

What the Research Shows

- Over half of veteran participants at One-Stops are 45 years of age or older
- For veterans 45 and older the EER is 40%
- For most age groups, unemployment rates for veterans are higher than for non-veterans
- Age and duration of military service interact to produce identifiable veteran subgroups
- Veterans of recent conflicts face new challenges in the current labor market

6

Serving Veterans at the One-Stop

7

More Veterans Returning and Facing Unique Challenges

- Heavy reliance on Guard/Reserve units means higher numbers returning from deployments
  - May need help with reinstatement in old job
  - Referral to VETS staff under USERRA
- Disabilities such as PTSD and traumatic brain injury
  - Employers hesitant to take on risks
  - Veterans hesitant to seek treatment and/or disclose conditions for fear of consequences

8

Most Helpful Workforce Services

Study of Key Veteran Subgroups

- Young and recently separated (UCX claimants): low intensity services, such as job search and referral
- Mid-career, not recently separated (UI claimants): medium intensity services, such as job search and referral + career guidance
- Older, recently separated (Retired): high intensity services, such as case management
- Those with significant barriers (e.g., homeless): not included in study; referral to needed services

9

What Local Staff Need to Know

Excluding Military Income

- Income earned while on active duty is disregarded when considering eligibility or low income status
  - Also includes service-connected disability compensation
  - See WIA Regulations (Sec. 667.255)
  - Does *not* include DOD pension for retirees

10

What Local Staff Need to Know

Coordinating Benefits to Fund Training

- WIA requires coordination of "other grant assistance" when funding training (e.g., Pell grants)
  - VA benefits such as the GI Bill are *not* other grant assistance," meaning veterans do not have to exhaust VA benefits as a condition for receipt of WIA training

11

What Local Staff Need to Know

Priority of Service Applies to ALL Services

- Priority of Service (POS) applies to the full range of services offered by workforce programs
  - Self-service*
  - Staff-assisted core services
  - Intensive services
  - Training services
- POS is not restricted to program enrollment

*POS would apply to the extent access to self-services is limited (e.g., computers in resource rooms)

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Key Aspects of Priority of Service

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Priority of Service

Timeline & Key Events

Nov. 7, 2002	Enactment of Jobs for Veterans Act (JVA) or P.L. 107-288
Dec. 6, 2006	P.L. 109-461 (Requirement to publish POS regulations)
Jan. 19, 2009	Final Regulations
Nov. 10, 2009	Joint Guidance on POS
Nov. 10, 2010	POS Protocol

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Issuance of Joint Guidance

Nov. 10, 2009

- Identical content issued on same date in each agency's guidance format
  - Training and Employment Guidance Letter (TEGL) 10-09 issued by ETA
  - Veterans' Program Letter (VPL) 07-09 issued by VETS

Only known instance of ETA and VETS issuing identical joint guidance

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Excerpts from Joint Guidance

Policies Needed!

- "…recipients subject to the [POS] regulations should review and, if necessary, enhance their current policies and procedures to ensure that adequate protocols are in place."
- "Each state, district or U.S. territory must develop policies for the delivery of priority of service by all qualified job training programs delivered through the state's workforce system."
- "[Policies] must require that processes are in place to ensure that veterans and eligible spouses are identified at the point of entry…"
- "Written copies of local priority of service policies should be maintained at all service delivery points…"

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Issuance of Protocol

Nov. 10, 2010

- ETA and VETS issued the ***Protocol on Priority of Service*** as a technical assistance tool to follow up on the issuance of regulations and guidance
  - Training and Employment Notice (TEN) 15-10
- Includes suggested approaches for implementing POS at One-Stop Career Centers

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What POS Actually Means

- **"Priority"**
  - Veterans and eligible spouses are entitled to precedence over non-covered persons for services – in other words, a veteran or eligible spouse either receives access to a service earlier or instead of the non-covered person
    - If a non-covered person is already enrolled, POS does *not* mean that the veteran or eligible spouse can bump that individual

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How It Works Across Programs

- ***Universal Access Programs -*** Do not include eligibility criteria (e.g., Wagner-Peyser services):
  - First priority level - Veterans and eligible spouses
  - Second priority level - Non-covered persons
- ***Programs with Eligibility Criteria*** - Conditions that all participants must meet (e.g., WIA Dislocated Wrkr)
  - First priority level - Veterans and eligible spouses who meet the eligibility criteria
  - Second priority level – Non-covered persons who meet the eligibility criteria

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How It Works Across Programs

Example: WIA Adult Program

- WIA Sec. 134(d)(4)(E) – If funds are limited, priority given to low income and public assistance recipients for intensive and training services
  - First level of priority - veterans or eligible spouses who are low income or public assistance recipients
  - Second level of priority - non-covered persons who are low income or public assistance recipients
  - Third level of priority - veterans or eligible spouses who are ***not*** low income or public assistance recipients
  - Fourth level of priority - non-covered persons who are ***not*** low income or public assistance recipients

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Verification of Veteran Status

- POS regulations emphasize ***immediate delivery of services*** to veterans and eligible spouses, ***not*** verification of status
  - While awaiting verification, program staff can provide services on a priority basis, including intensive services
  - However, services based on outside resources (such as classroom training) are ***not*** delivered on a priority basis while awaiting verification

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Monitoring Priority of Service

- **Joint monitoring by:**
  - The Veterans' Employment and Training Service (VETS)
  - The DOL agency responsible for the program's administration and oversight (typically ETA)
- **If monitoring identifies a failure to comply:**
  - Handled based on the program's established compliance review processes
  - A corrective action plan also may be required

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Two Reporting Requirements

1. ***All programs*** are required to adopt the definitions for *veteran* and *eligible spouse* from POS regulations at OMB's next approval of their reporting requirements
   - Translation: Only one day of active duty service necessary to receive priority of service
2. ***Some programs*** are required to collect data on *covered entrants*
   - Veterans or eligible spouses who are at the "point of entry" to the workforce system or a qualified job training program (i.e., at the initial point of contact, prior to receipt of services; e.g., an *applicant*, not a *participant*)

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Reporting on Covered Entrants

- Programs required to report on ***covered entrants***:
  - *Wagner-Peyser State Grants*
  - *WIA Adult*
  - *WIA Dislocated Worker*
  - *WIA National Emergency Grants*
  - *Trade Adjustment Assistance (TAA)*
  - *Senior Community Service Employment Program (SCSEP)*

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Implementation of Reporting

- For ***SCSEP***, the new definitions were adopted and reporting on covered entrants was implemented July 1, 2009 (PY 2009)
- For ***Wagner-Peyser***, ***WIA*** (Adult, DW, NEG), and ***TAA***, reporting on covered entrants has been waived for PY 2009, PY 2010 and PY 2011
  - ETA and VETS are considering when and how to implement reporting on covered entrants for ***Wagner-Peyser***, ***WIA*** and ***TAA***

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The Proposed National Threshold for a Veterans' Entered Employment Rate

26

Background

- The JVA includes a provision that requires DOL to publish regulations on a 'National Threshold'
- A *Notice of Proposed Rulemaking* (NPRM) was published on 2/18/11
- The comment period closed 4/19/11 (seven recipients of Jobs for Veterans State Grants submitted comments)
- A *Final Rule* scheduled to be published early in 2012

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Scope

- The NPRM **proposes** to establish the National Threshold as a minimum performance level for the *Entered Employment Rate* for veterans that would apply to services provided under:
  - Wagner-Peyser State Grants
  - Jobs for Veterans State Grants
- The National Threshold is ***not*** proposed to apply to the services provided to veterans under WIA grants

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About the Threshold

- The Threshold is proposed to apply to the *Entered Employment Rate* (EER) for veterans at two levels for the "program year under review"
  - The ***state*** level for that year
  - The ***national*** level for that year
- The Threshold is proposed to be established at 90% of the national level results for the program year under review

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A Two-Step Process

1. States whose EER for veterans fell below the National Threshold for a given program year would undergo a performance review by DOL
2. If the DOL review determines a State's performance was deficient, a Corrective Action Plan (CAP) would be required
   - DOL would assist the State in preparing a CAP
   - DOL would approve the CAP for implementation

30

Key Facts

- The National Threshold would ***not*** be a "trigger" for an automatic CAP
- For states below the Threshold, it would only "trigger" a performance review by DOL
  - The review would seek to distinguish between a state's service delivery factors and factors beyond the state's control
- For PY 2005—PY 2009, eight or nine states per year would not have met the Threshold, if it had been applied

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Thank you !

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