Grantee Handbook

U.S. DEPARTMENT OF LABOR EMPLOYMENT AND TRAINING ADMINISTRATION



Disclaimer – This handbook is a general resource designed to orient grantees to the grant process in ETA. Specific details about particular grants may differ. *This handbook applies to grants awarded on or after July 1, 2016.*

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WELCOME!

Congratulations on receiving a competitive grant from DOL's Employment and Training Administration (ETA). You have recently received one of ETA's numerous grants that together provide job training, career pathways, credential attainment, and employment opportunities to millions of customers seeking employment and training services in the United States. All customers of ETA funded workforce development services and activities must have authorization to work in the United States of America. We recognize that this can sometimes be an overwhelming responsibility. Our goal in assembling this Grantee Handbook was to make sure that you have resources and information at hand to help you succeed in this vitally important assignment.

This Grantee Handbook is presented in seven sections. Each section contains pertinent information that you and your staff need to know regarding the goals and expectations for managing an ETA competitively-awarded grant.

1. ETA's Team Approach to Grant Management – Organizational Roles and Responsibilities 2. An Overview of	 Describes how ETA's Regional and National offices work together to manage competitively-awarded grants. Provides direction on contacting an appropriate member of the grant management team when you need technical guidance, policy clarification or concurrence with proposed changes. Walks through the content of each document included in your Grant Award
Award Documents, Grantee Obligations, and Regulatory Requirements	 Package. Provides a framework for helping you and your staff manage your grant so that it closely aligns with the goals, responsibilities, and commitments outlined in your approved Grant Agreement.
3. How to Manage Your Period of Performance	 Describes specific leadership and coordination roles expected of ETA grantees and provides guidance to help you succeed in meeting promised milestones and deliverables. Categories of guidance covered in this section include: Explanation of responsibilities and obligations regarding administrative procedure, project staffing, workforce development and training, employer and partner engagement, financial reporting, and participation in monitoring activities; Making the most strategic use of the project planning phase; and Finding relevant technical assistance resources from ETA.
4. Modifying Grants	 Explains the grant modification process and the types of modifications that are possible. Includes a modification checklist and a step-by-step description of the modification review process and timeframe.
5. Evaluation: What Do I Need to Know As A Grantee?	Provides an overview of ETA's grant evaluation process, expectations regarding your potential contribution to post-grant evaluation activity, the types of evaluation methods that are used to assess the impact of ETA competitive grants, and the role of evaluation in determining future programmatic and policy decisions.
6. Audit Phase	Provides an overview on types of audits.

	Describes the audit process.Provides an overview of the audit requirements.		
7. Closeout Phase Descri Details grant c		Describes the process to close out a grant. Details the certifications and materials that are needed to successfully complete grant closeout. Includes a list of required forms for closeout as well as the expectations on grantees after grant closeout.	

The Grantee Handbook also contains additional resources that you may find useful to have at your fingertips as you implement your grant. These include:

- Instructions and guidance on grant requirements and timelines;
- Checklists to help you prepare for various stages of grant management;
- Lists of key resources and contacts in ETA; and
- Quick "at-a-glance" charts of ETA grant programs and their associated statutes and regulations.

Other Potential Grantee Resources:

Performance Reporting Handbook: A handbook may also be issued related to the specific performance reporting requirements that pertain to your grant. More details about performance reporting is included in Section 3.

Program-Specific Features: Depending on the grant program in which you're participating, you may also receive a program-specific Grantee Orientation (in-person or remotely via webinar).

SECTION 1

ETA'S TEAM APPROACH TO GRANT MANAGEMENT – ORGANIZATIONAL ROLES AND RESPONSIBILITIES

ETA established a multi-faceted grant management system designed to offer grantees easy access to customer service, technical assistance, and policy guidance during each stage of grant planning, implementation, and closeout, while maintaining transparency and accountability. To help clarify the grant management process and help you determine how to most efficiently access ETA assistance, this section contains:

- A bird's eye view of ETA's primary purpose in administering competitively-awarded employment and training grants;
- Online resources and contacts for guidance and information when questions and issues emerge during grant planning, implementation, and closeout; and
- **Definitions of the specific roles and responsibilities** carried out by each organizational arm of ETA's grant management team.

Purpose

Though the target populations and activities may vary among individual grant programs, the core objective that ties together ETA's competitively-awarded grant initiatives is an emphasis on supporting activities that contribute to the development of an integrated national workforce investment system that:

- Provides individuals with the information, assistance, and training they need to compete successfully for high-demand positions and occupations;
- Gives workers the skills and knowledge they need to maintain high-quality jobs and pursue desirable career pathways;
- Provides employers with access to a larger volume of highly-skilled, appropriately trained workers in the domestic workforce; and
- Supports economic stability and growth.

ETA Staff Support

ETA staff work collaboratively to ensure individual needs for technical assistance and guidance are met as quickly and appropriately as possible during each phase of the grant lifecycle - planning, implementation, completion, and closeout. Your primary point of contact will be your Federal Project Officer (FPO), though you may also interact with other staff from the Regional Office, the Office of Grants Management, and national program staff in ETA's program offices.

Role of Federal Project Officer

As a grantee, your FPO is located in one of ETA's six regional offices or ETA's national office, acts as your *primary point of contact* for the ETA competitive grants management team throughout the grant's period of performance. Your FPO should be the first person you approach when questions or issues arise related to your grant that need technical assistance, clarification or resolution. The FPO will assist you in locating and accessing appropriate technical assistance to help you comply with

program requirements and support you as you work to reach your outcome goals.

Your FPO will review your quarterly programmatic and financial reports and will follow up with you with any questions or concerns. Additionally, your FPO may conduct in-person site visits for technical assistance or compliance monitoring of the grant.

Your FPO will work with you on any modifications. Please see Section 4 for additional information on modifying grants.

FPOs will verify that grant activities are conducted in compliance with the Grant Agreement and applicable Federal regulations. They will evaluate your organization's progress toward the goals specified in your Grant Agreement and assess the quality of the program and services, including identifying promising practices and providing additional technical assistance as needed to help you meet your goals. Technical assistance may include but is not limited to program design, service strategies and other areas to enhance program performance. If a grantee's own efforts to research, identify and access technical assistance resources have not been successful, FPOs can help the grantee to identify and get access to relevant technical assistance resources specific to the grantee's needs. If your grant is experiencing challenges in achieving a specific outcome(s), we encourage you to reach out to your FPO.

FPO's will coordinate with the regional fiscal staff regarding oversight, technical assistance, and training on financial management. (A comprehensive overview of the grant monitoring process is offered in Section 3: *How to Manage Your Period of Performance*.)

Federal Project Officers (FPOs) work in ETA's six regional offices, and sometimes in the national office, and serve as primary points of contact for technical, fiscal, and administrative quidance.

ETA's Regional Offices

Region 1 - Boston

Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Puerto Rico, Rhode Island, Vermont, and Virgin Islands

Region 2 – Philadelphia

Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, and West Virginia

Region 3 – Atlanta

Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee

Region 4 – Dallas

Arkansas, Colorado, Louisiana, Montana, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, Utah, and Wyoming

Region 5 - Chicago

Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, Ohio, and Wisconsin

Region 6 – San Francisco

Alaska, American Samoa, Arizona, California, CNMI, Guam, Hawaii, Idaho, Nevada, Oregon, Palau, and Washington

The National Office includes ETA program offices and OGM and is located in Washington, DC.

Role of Your National Grant Officer

National Grant Officers have overall responsibility for the execution and administration of grants. Only authorized National Grant Officers can obligate ETA's grant and cooperative agreement funds. To carry out this responsibility, they perform the following administrative and fiduciary functions on behalf of ETA:

- Manage and oversee the competitive award process, including the development and publication of Funding Opportunity Announcements (in collaboration with National Program Office Staff) and the review and selection of grant applications;
- Serve as the formal signatory on grant awards;
- Maintain the official grant file;
- Approve modifications to grant statements of work, budget realignments, and program plans;
- Review and approve planned grant activities as required by the Grant Agreement and/or Federal cost principles (e.g., equipment purchases and renovations);
- Issue initial and final determinations related to programmatic, financial, or administrative concerns; and
- Impose additional specific award conditions, as needed.

ETA also has Regional Grant Officers who have specific responsibilities delegated from the National Grant Officer. Your FPO will direct issues, as appropriate, to the Regional Grant Officer.

In most cases, grantees' primary contact will be the FPO, who works closely with the Regional Grant Officers to coordinate with the national grant and program offices, as necessary. As the primary liaison to the ETA grants management team, your FPO is responsible for contacting the National Grant Officer on your behalf for guidance on financial or administrative questions and relaying the answer to you in a timely manner. In certain instances of particularly complex questions or issues, your FPO may ask you to carbon copy (CC) the grant program mailbox (see Appendix D) or a specific national program office liaison to ensure that the appropriate specialist has access to all pertinent information needed to make a fully informed decision about your grant.

Role of National Program Office Staff

National Program Office staff serve as content specialists on the ETA grants management team. They develop guidelines, criteria, and performance measures for individual funding opportunities, provide guidance throughout the grant's period of performance, and determine the suitability of any changes to previously-approved project work plans and measures. To enhance grant outcomes, they also offer a wide array of program-specific technical assistance and training services.

Primary grant management functions of National Program Office staff include:

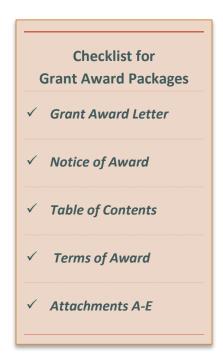
- Developing Funding Opportunity Announcements (FOAs);
- Creating communication and training materials to support FOAs:
- Developing and implementing performance reporting requirements;
- Developing training modules on performance reporting protocols;

- Organizing new grantee orientations and periodic formal training opportunities for current grantees;
- Supporting FPOs in the research, identification and provision of technical assistance in program design, service strategies and other areas to enhance program performance;
- Reviewing and providing concurrence on proposed modifications to approved work plans or proposed performance indicators and measures;
- Providing program and performance information to inquiries from the Administration,
 Congress, the Government Accountability Office, the Inspector General, and others;
- Providing guidance on evaluation design to internal and external evaluation experts; and
- Providing policy guidance on program operations.

SECTION 2

AN OVERVIEW OF AWARD DOCUMENTS, GRANTEE OBLIGATIONS, AND REGULATORY REQUIREMENTS

You received notification that your organization was awarded an ETA grant. So what's next? Please review your Grant Agreement closely – it is the primary resource for specific details about your grant. This handbook is a general resource that provides an overview of the ETA grant process for your reference only. Step one to ensuring the successful achievement of your grant goals is ensuring that



all key staff receive a copy of the Statement of Work and understand all components from vision, partnerships, program design, service strategies, planned deliverables and outcomes and where appropriate relevant budget information.

Grant Award Package

Your grant award package consists of a *Grant Award Letter and a Grant Agreement including a number of attachments*. The first page of the Grant Agreement is the *Notice of Award (NOA)*. The NOA is followed by: a Table of Contents, Terms of Award, Attachments: A (Application for Federal Assistance (Form SF-424)); B (Budget Information (Form SF-424A)); C (the Budget Narrative); D (the Statement of Work, which encompasses the Project Narrative and attachments); and if applicable, E (your Federally approved Indirect Cost Rate Agreement or Cost Allocation Plan).

Special Note: If your grant has Conditions of Award, these conditions are generally included before the Table of Contents in the

grant award package. The Condition of Award document identifies any issues, including the necessary next steps that may require further clarification and/or a modification and an expected completion timeframe. Grantees must respond to these conditions as instructed.

Federal Award Identification Number (FAIN)

Each grant award is identified by the unique identifier, or FAIN, assigned to it. FAINs appear as a series of 14 alphabetic and numeric characters on the first page of a Grant Agreement (such as the AA-12345-12-55-A-26 series used for illustrative purposes below) and is assembled in the following order:

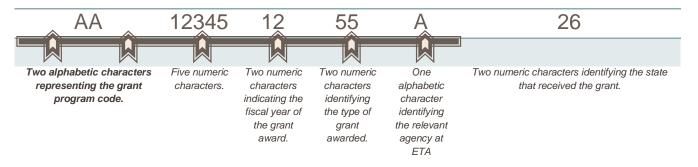


Figure 1: Breakdown of FAIN/Grant Numbers

Grant Award Letter

The grant award letter contains instructions on obtaining a Payment Management System (PMS) account which is necessary to access your grant funds. Please read carefully and establish your PMS account as soon as possible.

Notice of Award (NOA)

The first page of your Grant Agreement is the NOA. The NOA contains basic information about the parameters of your grant:

- The name of the relevant grant program;
- Identifying information for the grant recipient (e.g., the name of your organization, address, Federal Employer Identification Number [EIN], and Data Universal Numbering System [DUNS] number);
- ETA identifying information, which is either the grant number or Federal Award Identification Number (FAIN);
- Period of Performance;
- Award amount; and
- Pertinent regulations and cost principles.

Terms and Conditions Table of Contents

This section shows the location of the terms and conditions with the grant agreement which your organization agreed to follow when applying for this grant. These terms may vary slightly depending on the grant requirements, so it is important that your organization review this section of the Grant Agreement. On the next page, you'll see a table of contents sample from a grant package. Again, Grant Agreements may contain slightly different terms and/or conditions thus each grant recipient should adhere to those terms and conditions in each Grant Agreement document.

FY 2016 TERMS AND CONDITIONS SAMPLE

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0			Attachment B: SF-424A
p			Attachment C: Budget Narrative
a			Attachment D: Statement of Work
r.			Attachment E: Indirect Cost Rate
	Conference Space		Agreement (if applicable)

Figure 2: Example of Terms & Conditions Table of Contents

Terms of Award

Highlighted below are some important Terms of Award and Attachments in the order they may appear within your grant package:

- A. Funding Opportunity Announcement
- B. Indirect Cost Rate and Cost Allocation Plan
- C. Administrative Cost Limitations
- D. Salary Restrictions
- E. Audits
- F. Equipment
- G. Reports (quarterly reporting requirements)
- H. Procurement
- I. Intellectual Property Rights
- J. Program Requirements
- K. Public Policy (Veterans Priority of Service)

The standard terms and conditions template can be found at:

http://www.doleta.gov/grants/resources.cfm.

A. Funding Opportunity Announcements (FOA)

Your application was awarded based on your response to the Funding Opportunity Announcement (FOA) and a link to the FOA can be found in your Grant Agreement (usually Term #2). In most cases, the FOA will be your most important tool in navigating your grant program as it describes the specific requirements for your SOW and provides a roadmap for successful implementation. In fact, the requirements outlined in the FOA are considered an integral part of a grant's requirements (which is why it is included in the formal Grant Agreement).

FOAs may include these critical components:

i. Industry Focus and Occupational Targets

The industry focus and occupational target of your grant program may be stipulated in the FOA. In some cases, your FOA will also include a list of acceptable North American Industry Classification System (NAICS) codes that should align to your training and employment outcomes.

ii. Allowable Grant Activities and Eligible Grant Participants

Allowable grant activities are specific grant-funded employment services, training, and other related services that may be provided. Eligible grant participants are the individuals eligible to receive the services as described in the FOA. Allowable grant activities may also include support and other related services to help participants succeed in the grant. Please see your FOA for program-specific information.

iii. Partnership Requirements

Grantees are expected to coordinate services with the larger public workforce system (e.g., local workforce development boards, <u>American Job Centers</u>, and/or local, municipal, or state agencies). We encourage you to actively engage the system in one or more of the following ways:

- Identifying, assessing, and referring candidates for training;
- Connecting trainees/workers with employers;
- Providing supportive services for qualified individuals, where appropriate;
- Leverage American Job Center (AJC) resources such as LMI, employer contacts, coenrollment; and
- Where applicable, collaborate with AJC in the provision of Registered Apprenticeships

You are also encouraged to reach out to other stakeholders in your local area. Stakeholders may include the employer community, industry associations, educational institutions, community-based organizations, foundations, and apprenticeship programs.

The exact roles of grant partners vary depending on your project strategy and the needs of your participants. As a general rule, it is beneficial to revisit your Grant Agreement and engage key partners already identified and included in your statement of work and outline their activities early in the grant implementation process, so that next steps may be established for the success of the grant. You are also encouraged to identify and leverage additional partnerships in your community and local workforce investment area. Participants may face a wide range of challenges that are best addressed through multiple strategies and through collaboration with a wide variety of partners, requiring extra time for planning and implementation. See Table 1 below for some additional responsibilities that key partners can provide.

Responsibility	Workforce Agencies	Educational Institutions & Agencies	Economic Development Agencies	Human Services Agencies	Community- Based Organizations	Employers
Assess skills	•			•	•	
Assist with financial aid		•				
Assist with tuition and fees	•			•	•	•
Create a job friendly business environment			•			
Create links between credit and non-credit programs		•				
Develop curriculum		•			•	•
Develop curriculum with multiple entrances/exits and "modularized" (chunked) sections		•			•	•
Deliver training		•			•	•
Design programs		•			•	•
Engage employers	•	•	•	•	•	
Expand export opportunities			•			
Fund innovation			•			
ldentify industry-recognized credentials	•	•		•	•	
Identify skill sets						•
Promote portability and flexibility		•				
Provide academic and personal counseling		•				
Provide career and personal counseling	•			•	•	
Provide case management	•				•	•
Provide credit for prior learning		•				
Provide employment						•
Provide incentives for business expansion			•			
Provide incentives to train incumbent workers			•			
Provide job placement assistance	•	•			•	•
Provide job retention services	•				•	
Provide job search assistance	•				•	
Provide labor market information	•		•			
Provide professional development opportunities	•	•		•	•	
Provide support services	•	•			•	•
Provide system navigation	•				•	
Provide trainers/faculty		•				•
Provide training facilities & equipment	•					•
Provide work-based learning opportunities						•
Recruit and make referrals	•			•	•	
Recruit new business development			•			

Table 1: Key Partner Responsibilities

B. Indirect Cost Rate and Cost Allocation Plan

The Standard Form (SF)-424A that your organization submitted as a part of your application indicated if your organization is claiming indirect costs.

- a. If your organization has a Federally approved Negotiated Indirect Cost Rate
 Agreement (NICRA) or Cost Allocation Plan (CAP), please review your Grant
 Agreement to ensure it was incorporated correctly.
- b. If your organization entered indirect cost on your SF 424A, but your organization does not yet have a Federally approved NICRA/CAP, ETA will automatically place your organization on a temporary billing rate for the first 90 days of your grant's period of performance. To continue to receive payment for indirect costs beyond this 90-day period, your organization will need to negotiate a NICRA/CAP with ETA's Division of Cost Determination or your organization's cognizant agency (i.e. the Federal agency from which you receive the preponderance of funds).
- c. If your organization elected to use the 10% *de minimis* rate per 2CFR 200.414, this should be noted in your Grant Agreement.

For additional information on indirect costs, please visit ETA's Office of Cost Determination website at https://www.dol.gov/oasam/boc/dcd/.

C. Administrative Cost Considerations

Administrative costs vary depending on the program. It is very important to review your Funding Opportunity Announcement and your Grant Agreement to determine if your Grant Agreement contains administrative cost limitations.

The Workforce Innovation and Opportunity Act (WIOA) defines administrative costs. If you are a grantee for a program that operates under WIOA authority, it is very important that you take the time to familiarize yourself with WIOA's definition of administrative costs so that you are able to allocate, document, and report your administrative costs appropriately. It is also important to note that other programs, such as the Senior Community Service Employment Program (which is authorized by the Older Americans Act), may have a different definition of administrative costs than the one found in WIOA. Carefully review your Grant Agreement for the applicable allowable administrative costs definition and specific authorization for your grant program.

The WIOA definition of administrative costs can be found at <u>20 CFR 683.215</u> and on http://www.workforcegps.org. Additional clarifying information may be found at <u>20 CFR 667.220</u>, and you can take advantage of the financial training tutorials accessible under the Financial Management section of https://www.workforcegps.org/online-training.

For programs not authorized under WIOA, please refer to the FOA for specific information on any administrative cost considerations.

D. Salary Restrictions

Salary restrictions vary according to the source of funds. If you are a grant recipient of a competitively-awarded ETA grant, you are subject to restrictions on the size of wages and bonuses provided to personnel associated with grant-related activities. Compensation for any individual must not exceed the equivalent of Executive Level II on the Federal pay scale, which can be found in the current year appropriation. Current pay tables may be accessed via the Office of Personnel Management Web site at http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages. This limitation applies to individuals paid directly with appropriated grant funds as well as to subrecipients of appropriated grant funds, and it includes both direct and indirect cost expenditures. Additional guidance on this topic may be found by consulting Training and Employment Guidance Letter (TEGL) 05-06 (issued August 15, 2006).

E. Audits

ETA uses Office of Inspector General (OIG) and Single audits as a routine mechanism for oversight of our grant recipients. Single audits are the most common audit procedure that ETA grantees face, carried out in compliance with 2 CFR 200.501. In brief, The Uniform Guidance requires that all single, non-Federal organizations that expend excess of \$750,000 (for your specific fiscal year) in Federal funds (from all sources) during the course of one year undergo a single audit procedure that satisfies the requirements of all sponsoring Federal agencies. These audits are conducted by an independent, non-Federal auditor (a licensed CPA), and the results of the audit are submitted to a central clearinghouse so that any Federal agencies can access them. Occasionally, your organization may also be asked to participate in supplementary audits by other Federal entities, such as the OIG, the Governmental Accountability Office (GAO), and the Defense Contracting Audit Agency. In all cases, OGM is responsible for resolving audit findings involving our funds or administrative procedures within six months after receiving the audit report. See Section 6: Audit Phase for details.

F. Equipment

In line with the Uniform Guidance, 2 CFR 200.33, ETA defines equipment as any tangible, personal property (including information technology systems) that has:

- 1) A useful life of more than one year; and
- 2) A per-unit acquisition which equals or exceeds the lesser of the capitalization level established by the non-Federal entity or \$5,000.

The acquisition cost of equipment is defined as the *net invoice price* of the equipment *plus* the cost of any modifications, attachments, accessories, or auxiliary apparatus needed to make the property usable for the purpose for which it was acquired. Other charges, such as the cost of installation, transportation, taxes, duty, or protective in-transit insurance, are

included or excluded from acquisition costs depending on the regular accounting practices of the recipient of the equipment.

Please be aware that prior approval is always required for equipment purchases/leases, even if the request to purchase equipment is already specified in your SOW and/or budget. This requirement applies to equipment purchased directly with grant funds, as well as to subrecipient's purchases with grant funds. Information submitted in your project narrative, budget narrative, or SF-424A regarding expected equipment purchases does NOT by itself constitute approval of these purchases. ETA reserves the right to withhold approval for equipment purchases outlined in any project narrative, budget narrative, or SF-424A Form submitted by grant awardees. Grantees are also required to follow all Federal procurement regulations for all equipment purchases.

To ensure that any planned purchases of equipment can be considered allowable costs, you must obtain specific written approval from your Grant Officer in advance of purchase. *Grant recipients may not purchase equipment in the last funded year of performance which is defined as full program service delivery (not follow-up activities), which may not be the same as the last twelve months of the period of performance. If any approved acquisition has not occurred prior to the last funded year of performance, approval for that item(s) is rescinded. Check your grant award for your specific term.*

Grantees should submit an equipment purchase approval request to your FPO shortly after receiving your grant award. Your request must follow the format outlined in the text box below and must include each item of equipment requested in the SOW. This timeline allows ETA sufficient opportunity to review and potentially give approval for all equipment purchases by the start of grant implementation, allowing for efficient execution of grant-related activities. Grantees are prohibited from incurring any costs related to equipment purchases with ETA grant funds until the request to purchase this equipment is approved by your Grant Officer.

How to Submit an Equipment Purchase Request to your FPO

Step 1: Call your FPO to discuss your Request.

Step 2: Submit Request to FPO under the following guidelines:

- Must be submitted on your organization's letterhead.
- Must be signed by the Authorized Representative.
- Must include the following information for each piece of equipment itemized in the request:
 - Item name:
 - Item description and basic specifications;
 - Estimated useful life of equipment (if not commonly known);
 - Item cost (actual or estimated), including the cost to put the asset in place and make it useable for the purposes for which it was acquired (if known);
 - Purpose of acquisition: a description of how the equipment will be used to support the grant and a reference to the approved activities in the SOW;
 - Contact name and telephone number, in case additional information is needed; and
 - Any other information requested by your FPO/ETA.

Step 3: How to Submit the Request:

Please contact your FPO for specific guidance on how to submit your request.

G. Reports (Quarterly Reporting Requirements)

Your organization is required to submit quarterly financial and programmatic reports. These reports are due no later than 45 days after the end of each quarter. See Section 3 for more information. Also, as an ETA grantee, your organization is encouraged to be aware of your State's broader Workforce Innovation and Opportunity Act funded workforce development system and its performance outcomes in your State's Workforce Development System. State Workforce Investment Act (previous authorizing legislation) and Workforce Innovation and Opportunity Act performance information is available at https://doleta.gov/performance/results/

H. Procurement

The Uniform Administrative Requirements (2 CFR 200.317) require states to follow the same policies and procedures it uses for non-Federal funds. The state will comply with §200.322 Procurement of Recovered Materials and ensure that every purchase order or other contract includes any clauses required by section §200.326 Contract provisions. Grant recipients must also follow the requirements regarding the competitive award of One-Stop Operators and youth service providers in the Workforce Investment and Opportunity Act at WIOA Sec. 121(d) and Sec.123.

I. Intellectual Property Rights

Pursuant to 2 CFR 2900.13, to ensure that the Federal investment of DOL funds has as broad an impact as possible and to encourage innovation in the development of new learning materials, as an ETA grantee you are required to license to the public all work created with the support of the grant under a Creative Commons Attribution 4.0 (CC BY) license. Work that must be licensed under the CC BY includes both new content created with the grant funds and modifications made to pre-existing, grantee-owned content using grant funds.

This license allows subsequent users to copy, distribute, transmit and adapt the copyrighted work and requires such users to attribute the work in the manner specified by the grantee. Notice of the license shall be affixed to the work. For general information on CC BY, please visit http://creativecommons.org/licenses/by/4.0.

Instructions for marking your work with CC BY can be found at http://wiki.creativecommons.org/Marking your work with a CC license.

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products, and any related materials). Such uses include, but are not limited to, the right to modify and distribute such products worldwide by any means, electronically or otherwise. The grantee may not use Federal funds to pay any royalty or license fee for use of a copyrighted work, or the cost of acquiring by purchase a copyright in a work, where the Department has a license or rights of free use in such work. If revenues are generated through selling products developed with grant funds, including intellectual property, DOL treats such revenues as program income. Such program income is added to the grant and must be expended for allowable grant activities.

As an ETA grantee, you should clearly state the following information on all written materials when issuing statements, press releases, requests for proposals, bid solicitations, and other documents describing the project or programs funded, in whole or in part, with Federal money:

- The percentage of the total cost of the program or project which will be financed with Federal money; and
- The dollar amount of Federal funds for the project or program.

If applicable, the following needs to be on all products developed in whole or in part with grant funds:

"This workforce product was funded by a grant awarded by the U.S. Department of Labor's Employment and Training Administration. The product was created by the grantee and does not necessarily reflect the official position of the U.S. Department of Labor. The U.S. Department of Labor makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information on linked sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership. This product is copyrighted by the institution that created it."

As a standard matter, the DOL seal is basically and primarily reserved for the Department's own use and should not be used by an external organization (even if it is a beneficiary of grant funding).

NOTE: The CC BY license is designed for content and not software code, so CC BY should not be used with software code developed using grant funds. On their FAQ page about open licensing of software code, Creative Commons has recommendations about open licensing of software code that we recommend as well. We recommend considering licenses made available by the Free Software Foundation or listed as "open source" by the Open Source Initiative. Please see: Commons License to Software?

Also note, the CC BY license allows commercial use. For example, businesses grantees partner with can also potentially use the CC BY materials for staff or customer training. The primary rationale here is that grant funds are public taxpayer money and the public (including businesses) should have access and rights to use what it has paid for.

J. Program Requirements

Matching funds and leveraged resources are program-specific requirements. You should refer to your FOA to determine your specific requirements.

Matching fund requirements apply when a financial match is either required by statute or is contained in the Grant Agreement as a condition of funding and must be expended for the purpose of the Federal award (usually a percentage of the award). Match expenditures must be from a non-Federal source, allowable under the statute, and pertinent to regulations (program regulations and the Uniform Guidance) and other Federal guidance. All non-Federal resources, cash and in-kind resources alike, that are allocated to allowable grant activities, correspond to prevailing cost principles, and are expended to further grant objectives are considered part of this matching requirement. Additional information on match requirements, including definitions, inclusions, and methods of valuation, are addressed in 2 CFR 306 and 2 CFR 2900.8.

Please note that during the life of the grant and at closeout, ETA will examine the match requirement (which the 9130 fiscal report refers to "Recipient Share Required") to confirm that the grant recipient has satisfied the obligations established in the grant program and/or in the specific Grant Agreement. If the closeout examination reveals any unmet match obligations, the grantee can end up owing debt to the Federal Government. Consequently, it is highly beneficial for you, as a grant recipient, to be very familiar with your grant's matching fund obligations and to maintain careful source documentation of matching contributions during your grant's period of performance.

Recipient Share is the total amount of non-Federal funds (match) required during the period of performance of the grant to support the objectives of the award as part of a requirement for matching.

Leveraged Resources is a category of expenditures that benefit the Federal project but are not charged to the DOL-ETA grant. These resources are contributions by the grantee that contribute to the Federal project, but are not a requirement of the Federal award. Leveraged resources are not defined in regulation or any related administrative requirements. For ETA programs, the term leveraged resources refers to all resources used by the grant recipient to support grant activity and outcomes, whether or not those resources meet the standards required for match. Other contributions by the grantee or a third party that contribute to the Federal project but do not meet the criteria above are also leveraged resources, but are recorded and reported in a different manner. The ETA-9130 quarterly financial report contains definitions of and descriptions for reporting leveraged resources.

K. Public Policy (Veterans Priority of Service)

The Jobs for Veterans Act (Public Law 107-28) requires that grantees provide priority to Veterans and spouses of certain Veterans for employment, training, and placement services in any job training program directly funded, in whole or in part, by ETA. Regulations implementing this priority of service can be found at 20 CFR Part 1010.

Attachments

Attachment A - The Standard Form (SF) 424 submitted with your application will be incorporated as Attachment A. This form contains informational data about your organization such as your Authorized Representative, your mailing address and your EIN. If your Authorized Representative changes during the period of performance, you are required to notify your FPO and submit a formal modification request.

Attachment B - SF-424A (Budget Information: Non-construction Programs)

Attachment C - Budget Narrative that describes the components of each line item on the SF-424A.

Attachment D - Statement of Work (SOW) which includes a project description, timelines, deliverables, and outcomes. All grant deliverables must be completed and planned outcomes met, unless the grant is officially modified before the end of the period of performance.

The SOW that appears in your Grant Award Package is derived from your grant application under the Funding Opportunity Announcement and includes the Project Narrative and all required and requested attachments, such as the abstract and letter(s) of commitment. For grants that are awarded competitively in one year and funded incrementally in future years, the SOW is obtained from the grant plan submitted during non-competitive years.

Attachment E - If your organization is claiming indirect costs and has a Federally approved Negotiated Indirect Cost Rate Agreement or Cost Allocation Plan and you included it in your application, it will be incorporated in your Grant Agreement under Attachment E.

SECTION 3

HOW TO MANAGE YOUR PERIOD OF PERFORMANCE

Grant Period of Performance

The *period of performance* is the authorized timeline for planning and implementing your grant. Consequently, all of your grant activities, performance outcomes, and grant expenditures must occur within this authorized time period unless you request and receive approval for a modification to your period of performance from the Grant Officer.

This section is intended to help you better understand how ETA looks at the period of performance, the expectations that accompany each stage of project planning and implementation, and the range of technical assistance available to you as an ETA grantee to help guide you toward successful grant implementation and outcome achievement.

Planning Phase

For new grantees that have a preliminary phase of grant implementation (three months to one year, depending on your particular grant program), you, as a grantee, must take the necessary steps to ensure that your grant has the necessary support structure in place to achieve successful outcomes. Proper preparation includes making sure that the following issues are fully addressed prior to implementation:

- Program Staffing and Support: recruiting and hiring the key staff members who will be responsible for managing and implementing your grant program;
- Facilities and Resources: obtaining the training space, equipment, and other key resources, such as supplies and worksite agreements, that you will need to carry out your SOW:
- Partner Engagement: developing and operationalizing relationships and partnerships establishing next steps with your local workforce development boards, employer partners, and other training collaborators that will allow you to provide necessary services to participants;
- Data Management: confirming that the management information system you intend to use for data collection, analysis, and reporting is fully developed and operational, if not being provided to you;
- Policy and Guidance: becoming familiar with all of the Federal policies and program specific guidance related to your award; and
- Systems Access: ensuring that you have established access to the Payment Management System and E-Grants system for funding drawdowns and financial reporting.

Program Development and Implementation Phase

This phase of the grant period of performance represents the heart of each grant award, as it is during this period that grant-funded programs and services are launched and delivered, and the viability of each grant initiative is truly tested. ETA's primary expectations of you as a grant recipient during this time period are that:

- Any protocols and processes that support the grant-funded program activities and related financial transactions are already in place;
- You are deeply familiar with your timeline for expected milestones and deliverables, as detailed in the FOA and proposed in your SOW; and
- You have developed and begun to implement your strategies for achieving your proposed project milestones and deliverables. For example, if you have received grant funding to carry out a project in which the main components involve career-oriented education and training activities, you will be expected to use this program development and implementation phase to fully execute your strategies regarding:
 - Participant outreach and recruitment;
 - Assessments and enrollment;
 - Development of Individualized Service Strategy or Individualized Employment Plan
 - Education and training (classroom and non-classroom related);
 - Job placement and employment;
 - Individual case management and follow up support services to enhance participant hiring and retention; and
 - Collaboration with and leveraging of partner resources to enhance achievement and success of grant deliverables.

Reporting Grant Progress and Accomplishments – Performance and Expenditures

To document the work completed and the outcomes achieved as a result of ETA funding, ETA requires regular submission of progress reports throughout the grant's period of performance. The frequency of reporting is either dictated by project guidelines or prescribed by grant program regulations. As a general rule, you are required to submit progress reports on a quarterly basis, and the reporting schedule is typically mentioned in your Grant Award Package. Specific details about expectations and requirements for performance reporting by ETA grantees are discussed comprehensively in the next section of this guide, *Reporting*. Your FPO is also available on an ongoing basis to help you determine an appropriate format and schedule for your progress reporting.

Accessing Funds: Payment Management System (PMS)

The Grant Award Letter includes information on how to access funds through the PMS, with instructions on how to create a PMS account, or, if you already have an existing account, who you should contact and what additional information is needed from you to initiate payments. It is imperative that the steps in the Grant Award Letter are followed as soon as you receive your

grant award so that your grant funds are placed into your account and you have access to your funds when you need them. Additional details about the PMS and forms that must be completed to access the system may be found at http://www.doleta.gov/grants/payment_information.cfm. The figure below illustrates the opening webpage for the Payment Management System.

Please note that PMS requires you to use a separate password and PIN than the ones you use to access the Financial Reporting System, which you will use to submit quarterly financial reports. (Additional details about the Financial Reporting System are covered in the following section.)

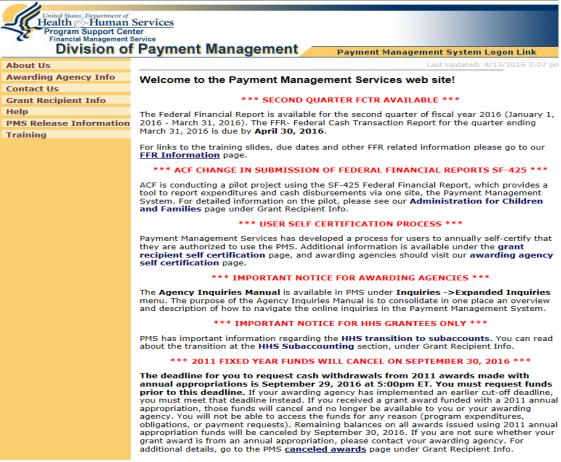


Figure 3: Payment Management System Opening Webpage

Financial Reporting: E-grants System

Grantees are required to submit reports about grant-related financial expenditures on a quarterly basis no later than 45 calendar days after the end of each reporting period (see Table 2 below). Competitive grant recipients are expected to use OMB-approved Form ETA-9130 to prepare your financial reports, unless otherwise instructed. A copy of Form ETA-9130 and related instructions are at http://wdr.doleta.gov/directives/attach/TEGL/TEGL_13_12_Att.pdf. Additional links to the Financial Reporting System portal are at http://www.doleta.gov/grants/financial_reporting.cfm.

Quarter	Quarter Start Date	Quarter End Date	Report Submission Due Date
1	January 1	March 31	May 15
2	April 1	June 30	August 14
3	July 1	September 30	November 14
4	October 1	December 31	February 14

Table 2: Financial Reporting System Submission Deadlines

If the deadline falls on a weekend or Federal holiday, we recommend that you submit reports the business day prior to the deadline.

Your Grant Award Letter will include instructions on how to receive a password and PIN that will enable you to access the E-grants Reporting System. Once the information requested in the award letter is sent to ETApassword.pin@dol.gov, you will receive confirmation of your password and PIN in separate messages.

Keep in mind that ETA requires financial reports to be submitted on an accrual basis, meaning that revenues and expenses are recognized when products are delivered or services are provided (and there is a reasonable expectation that cash will be received or paid), rather than at the time that cash is actually received or paid. Even if you do not operate your accounting system under an accrual basis, you are still required to track and report your financial transactions on an accrual basis to the ETA.

To help grantees better understand and meet the ETA financial reporting and accrual accounting requirements, ETA offers a number of on-line training tutorials, archived Webinars, and other informational resources aimed at answering grantees' most "frequently asked questions." Additional training on ETA's financial reporting and accrual accounting requirements is located at: http://www.doleta.gov/grants/resources.cfm and https://www.workforcegps.org/online-training.

Note: You have 90 calendar days <u>after</u> the last day of the period of performance to charge the grant for allowable costs incurred <u>on or before</u> the last day of the period of performance. However, no costs incurred after the last day of the period or performance may be charged to the grant. This includes costs to closeout the grant.



Figure 4: Sample External Reporting System Webpage - EBSS

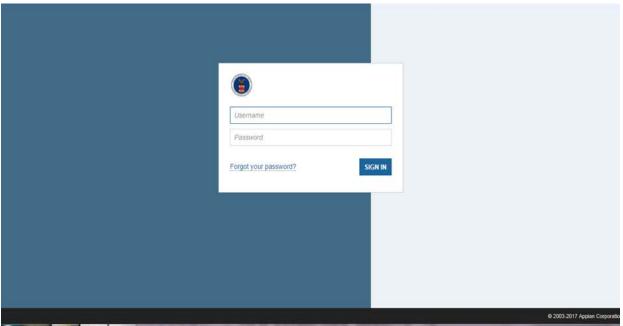


Figure 5: SAMPLE Reporting System Webpage - WIPS

How to Get Started - ETA's Online Resources for Grant Management

When beginning your search for grant management guidance, the first step is to peruse ETA's Web page for ETA grantees at https://www.workforcegps.org or the dedicated community of practice Web pages for other grant programs. These sites serve as a central repository for training, technical assistance, and policy guidance on competitive national grant programs. They were created specifically so that grantees could receive instant access to relevant technical and policy guidance. Available resources include items such as grant-specific "frequently asked questions," fact sheets, archived Webinars, performance reporting guidance, newsletters, and useful examples and models from grantee peers. In many cases, these sites can provide the quickest and most direct way of obtaining an authoritative answer to your question. Additional information about ETA's on-line and virtual resources for grant management is also available on page 36 of this document, under the heading, "Available Technical Assistance and Training to Help You with Your Period of Performance."

Performance Reporting

ETA places a very high priority on maximizing successful grant performance and relies heavily on frequent performance reporting to measure and track your success toward achieving satisfactory outcomes. ETA grantees are typically required to submit, on a quarterly basis, two progress reports that track performance throughout the entire lifetime of the grant. These include:

- A narrative report detailing key milestones and achievements attained during each given reporting quarter along with descriptions of any challenges encountered; and
- A performance report comprised of data related to a number of performance targets and measurements specifically designed to align with your grant's SOW and individual performance objectives. Categories of data recorded in your quantitative reports might include such data fields as:
 - Total grant participants served;
 - Total participants beginning and completing education/training activities;
 - o Total number of credentials attained by participants; and
 - Total number of participants who secured and/or retained employment.

All grantees must agree to comply with DOL/ETA reporting requirements. Upon grant award, the Program Office will provide detailed information on the quarterly submission process, the system for submitting reports, and detailed guidance about the data and other information that is required to be collected and reported on during your grant's period of performance. Please also refer to the FOA for requirements for reporting, specific to your grant program.

DOL/ETA is currently transitioning to reporting on the WIOA performance indicators. Some grant programs may still be using WIA case management or reporting systems as full implementation of

the new indicators is being rolled out. The Workforce Information Performance System (WIPS) is currently completing development and it is expected that, eventually, all discretionary programs will be reporting either directly into WIPS or into a system through which reports will be uploaded into WIPS for viewing. This handbook will be updated on an annual basis and system reporting requirements for individual grant programs will be revised annually as new programs are brought online under WIPS. See Table 4 for the current status of grant program reporting requirements.

Timing of Performance Reports

You are required to file both narrative and quantitative performance reports each quarter throughout your grant's period of performance. Reports containing pertinent information and data about the preceding quarter's activities should be submitted no later than 45 days after the end of each calendar quarter, as illustrated in Table 3. Note: Performance reports and financial reports share the same submission deadlines.

Quarter	Quarter Start Date	Quarter End Date	Report Submission Due Date	
1	January 1	March 31	May 15	
2	April 1	June 30	August 14	
3	July 1	September 30	November 14	
4	October 1	December 31	February 14	

Table 3: Performance Reporting Timeframes and Submission Deadlines

If the deadline falls on a weekend or Federal holiday, we recommend that you submit reports the business day prior to the deadline.

The last quarterly progress report will serve as the grant's Final Performance Report, and is due no later than 45 days after the end of the grant period of performance. This report must provide both quarterly and cumulative information on the grant activities. It must summarize project activities, employment outcomes and other deliverables, and related results of the project, and must thoroughly document the training or labor market information approaches that you used.

The Value of Performance and Outcomes Reporting

Systematic and frequent reporting of performance metrics allows ETA to assess and measure performance across grantees and across individual grant initiatives, which both permit ETA to keep key political stakeholders informed about the positive workforce outcomes resulting from ETA's strategic investments and allow it to readily identify and implement needed improvements in the administration and delivery of its grant initiatives. Meanwhile, from a grantee perspective, the ability to track performance so closely throughout the grant's life cycle either verifies that your grant is moving in a positive direction to meet the needs of participants and key stakeholders appropriately or allows you to identify the necessary corrective measures to improve the likelihood of success during the remainder of the grant's period of performance.

Beyond the short-term benefits of goal alignment and enhanced prospects for success in your individual grant, the practice of frequent performance reporting offers additional dividends in terms of longer-term project resilience and sustainability. By accumulating such fine-tuned information on the grant's performance and outcomes, you can help your organization strengthen and expand its workforce development strategies as follows:

- Demonstrate the positive outcomes of the grant activities to investors and partners to help ensure sustainability of the project and partnerships;
- Illustrate the return on investment of the grant to employer partners, which is an important factor in maintaining existing, and securing new, partnerships and resources; and
- Use collected data to adopt a model of continuous improvement in your management and implementation of grants by establishing a regular practice of identifying barriers to success, soliciting feedback from partners and participants, and implementing corrective measures as needed to ensure that the grant is best meeting stakeholder needs.

NOTE: Please be aware that past performance reporting practices by grantees exert an increasing influence on future award decisions. There is a growing trend, when evaluating suitability for new grant awards, in favor of considering the track record of past grantees in submitting complete and timely performance reports and meeting planned performance measures.

Monitoring of Your Grant

ETA grantees can expect to be monitored at least once (and, perhaps, more frequently) during the grant's period of performance, either through an on-site monitoring review or an Enhanced Desk Monitoring Review (EDMR). ETA uses monitoring to verify that grantees are:

- Complying with Federal statutes, regulations, and grant terms and conditions;
- Adhering to Federal financial and administrative requirements and cost principles;
- Meeting the programmatic requirements laid out in the grant's FOA; and
- Meeting performance goals established in the SOW.

An entrance meeting is held and each element of the monitoring process is conducted and documented in the ETA <u>Core Monitoring Guide</u>, which is the primary tool FPOs use to review any ETA-funded grant activity. The guide is organized around five core activities:

- 1. Design and governance;
- 2. Program and grant management systems;
- 3. Financial management systems;
- 4. Service/Product delivery; and
- 5. Performance accountability.

Each core activity is, in turn, organized around generic program requirements derived from legislation, regulations, or promising practices that relate to that core activity. These requirements or

expectations are called *objectives*. Each objective is then followed by a set of related *indicators*, which are criteria or characteristics associated with the successful attainment of the corresponding objective. Indicators either denote compliance with mandatory program requirements or effectiveness in meeting the stated criterion. By using this approach, FPOs are able to use their monitoring interviews with grantees both to identify early signs of successful performance and as an "early warning system" that a particular grantee organization may require further intervention and coaching. The full guide used by FPOs during monitoring reviews, which provides a comprehensive overview of the process and the intent behind it, may be viewed and downloaded here: Core Monitoring Guide.

Monitoring ensures that the grant is implemented in alignment with approved and established policies and procedures. Further, the monitoring process also provides an opportunity for ETA, contract, or other Federal agency personnel to engage more deeply with you and your grant partners and work together to enhance your prospects for success as well as the success of the entire grant program. For example, the results of a monitoring review might be used to identify which available technical assistance resources would be most beneficial to you (described further in a later discussion on *Available Technical Assistance to Help You with Your Period of Performance*) or if you have adopted practices that might benefit other grantees.

Legally, you must be contacted at least 7 days prior to the expected timing of a monitoring review, though ETA usually gives grantees at least 30 days notice. In this notice, you will be provided with the specific dates and information of the review, the types of interviews that will be conducted and the materials that will be reviewed. Depending on the focus of the review, ETA usually interviews project staff, participants, employers and other partners. We will also request to review the following materials:

- Participant files;
- Contracts with subrecipients;
- Financial documents;
- Products developed;
- Project implementation tools;
- Allocation of expenditures; and
- Policies, procedures, and practices related to performance and financial management.

Common issues and concerns that surface during a monitoring review of grantees include:

- Failure to report financial expenditures on an accrual basis;
- Absence of written policies and procedures for program and fiscal functions; or failure to adhere to written policies and procedures;
- Failure to request Grant Officer approval prior to purchasing equipment; and
- Failure to provide sufficient documentation to support the need for a particular grant expenditure.

Types of Monitoring

Monitoring typically occurs during the mid-point of your grant's period of performance and can be done on-site or by EDMR. However, monitoring may take place at a different point during the period of performance, as deemed appropriate by ETA. Additional reviews or on-site visits may be considered depending on the oversight requirements of a specific grant program, if a grantee is new, and/or if a grantee is considered to be "at risk" for any of the following reasons:

- **Grievance:** a source or entity files a grievance or complaint against the grantee/program that challenges the integrity of the grant's management;
- Financial: the grant has potentially questionable expenditures and/or cumulative expenditures that are not proportionate to the amount of time that has elapsed since the receipt of the award;
- **Performance:** the grant is significantly off-track in achieving its goals or benchmarks;
- Reporting: the grantee has a history of reporting expenditures or performance data inaccurately or has failed repeatedly to submit complete reports; or
- Other: issues or concerns that may undermine the grant's compliance with financial, administrative, performance, or program design requirements.

Monitoring reviews usually take place over 3-5 days, with the exact number of days varying with the size and scope of your grant.

Post-Monitoring Procedures

After the monitoring process is completed, and all information is reviewed, an exit meeting will be held. Within 45 days of the exit meeting, you will receive a monitoring report from ETA that will include: background information (when the monitoring occurred, where it took place, and who participated); compliance findings, if any were identified; and required grantee action for compliance findings, along with the related response due date. The report may also include other observations that are not compliance findings, as well as promising practices.

Available Technical Assistance and Training to Help You with Your Period of Performance

As an ETA grantee, in addition to technical assistance provided collaboratively by the National and Regional Offices, you will benefit from a variety of technical assistance tools and resources to support the successful rollout and performance of your grant-funded project(s). Much of the technical assistance offered is customized to take the specific needs and requirements of the grant program into account so that you are able to manage the grant more efficiently and be better prepared to achieve performance targets. Grantee's first step to addressing TA needs should be to contact their FPO, identify area of need and request TA on the specific grant topic areas.

Typical examples of technical assistance offered to ETA grantees include:

- New Grantee Orientation: This training event, held shortly after the official notification of grant awards, is required for key personnel responsible for grant implementation, compliance, and oversight. The orientation helps grantees better understand which core program components are required to meet ETA expectations for successful program service delivery and thoroughly addresses expected obligations and restrictions regarding fiscal and administrative compliance. These events may be held as live meetings or as virtual gatherings.
- National and Regional Training Events (in-person, telephonic, or virtual): These periodic events provide opportunities for you to receive supplemental intensive training on core program, fiscal, and administrative requirements along with the opportunity to learn about best practices, gain exposure to new and promising practices, and interact with your grant program peers and Federal Project Officers.
- Virtual and On-line Technical Assistance: The WorkforceGPS electronic Web space, ETA's one-stop information clearinghouse, offers grantees and other key ETA stakeholders timely and convenient access to a wide variety of technical assistance tools, materials, on-line learning events, and virtual peer networks aimed at supporting successful workforce development outcomes. ETA grantees will want to quickly establish a free account on WorkforceGPS and sign up to receive updates from their grantee community. The account also allows you to register for webinars, save materials you reference often, and participate in discussions within your grantee community.

From the top of the WorkforceGPS landing page, access these resources by clicking one of these tabs:

- ETA Grants or Communities: the main menu for ETA's Community of Practice (CoP) sites, where you can learn, ask questions, and share information with fellow grantees or members of other topical interest groups. Sample resource materials available from the grant-specific CoP sites include such items as "frequently asked questions," fact sheets, performance reporting guidance, and newsletters provided by the ETA National Office along with useful examples and models provided by peers.
- Resource Library: the main search engine for WorkforceGPS, where you can browse or search for specific materials by category, resource types, or keyword.
- Workforce System Strategies: allows you to browse and search for research evidence that may be useful in providing guidance for successful program design and implementation.
- Grantee Coaching: These activities include one-on-one or group training in specialized areas
 focused on enhancing knowledge and skills that support successful program implementation.
 The need for customized coaching services may be identified by grantees, FPOs, consultants, or

coaches working under contract with ETA. Coaching is primarily used as a way to address areas of concern that emerge early in the grant period of performance that suggest potential risk of non-compliance or failed implementation of grant objectives.

SECTION 4

MODIFYING GRANTS

Grant Modifications

Grant recipients must request and obtain prior written approval for most revisions to an original program plan or budget allocation. Primary

categories of activity that require prior authorization include:

- Change to the Statement of Work (SOW)
- Budget Realignment¹
- Purchase or Lease of Equipment
- Change of Authorized Representative
- Change of Point of Contact
- Change of Address
- Change of Organization/Institution Name
- Change to Work or Training Site (varies by grant program)
- Changes to Indirect Cost Rate Agreement/Incorporation of Indirect Cost Rate Agreement
- Period of Performance Extension

Checklist for Modification Request Letter

- ✓ Call your FPO to discuss your request
- ✓ Prepare the letter on the organization's letterhead
- ✓ Address the letter to your Grant Officer
- ✓ Include a written description and justification for each proposed change
- ✓ E-mail a draft of the letter to your FPO for feedback
- ✓ E-mail the final letter signed by your grant's Authorized Representative to your FPO

And, if relevant:

- ✓ Provide an updated project timeline
- ✓ Provide an updated budget narrative
- ✓ Provide an updated SF-424A form
- ✓ Any other information requested by your FPO/ETA

To initiate a modification request, prepare a formal letter of request addressed to your Grant Officer on your organization's letterhead and send a draft by e-mail to your FPO, who will review and provide feedback (if any), then submit your final letter signed by your Authorized Representative indicated on the SF-424 to your FPO who will forward the letter to your Grant Officer. The subject line of the letter should include the requested modification type(s), grant name, and grant number, while the body of the letter should outline the nature of the requested modification(s) and include a separate written justification for each modification requested. In addition, the letter should be signed by the individual who is serving as the Authorized Representative for your grant.

¹ In accordance with the Terms and Conditions in the Grant Agreement and 2 CFR 200.308(e), the transfer of funds among direct cost categories or programs, functions, and activities is restricted such that if the cumulative amount of such transfers exceeds or is expected to exceed 10 percent of the total budget as last approved by the Federal awarding agency, the recipient must receive prior approval from the Grant Officer.

Please note that a verbal discussion and/or commitment from your FPO or Grant Officer may not be substituted for a formal, written modification request.

Step-by-Step Guide of the Modification Process

- 1. Call your FPO to discuss the need for a modification and to verify the documentation/format needed to submit it.
- Submit a draft of the required modification letter and related documents to your FPO by e-mail, following the format instructions listed in the Checklist for Modification Request Letter sidebar above.
- 3. Your FPO reviews the request letter and provides feedback, if needed.
- 4. If indicated by your FPO, revise your request letter/package and submit the signed modification request².
- 5. Once all of the issues and questions have been resolved, your FPO submits the modification request for regional management review.
- 6. Once the regional management team gives approval, your FPO forwards the modification request to your Grant Officer for final review.
- 7. Your Grant Officer reviews the request and may ask for additional information or revisions.
- 8. If there are no additional questions, the Grant Officer approves and signs the modification. Both you and your FPO will receive an electronic copy of the modification via e-mail.
- 9. You are now free to implement your requested changes.

Please note the modification process can take between 30 and 60 days to complete. Requested changes cannot be implemented until final approval from the Grant Officer is provided. You can request more detailed technical assistance on this topic from your FPO.

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² Certain types of modifications (e.g., any changes to your SOW) may require additional approval from the Program Office staff. Your FPO works in partnership with Program Office staff and will let you know if the Program Office has additional questions related to your modification request.

SECTION 5

EVALUATION - WHAT DO I NEED TO KNOW AS A GRANTEE?

To enhance the likelihood that funded projects will identify effective workforce education and training strategies and models that can be replicated broadly throughout the country, ETA places a high priority on evaluating programs and strategies it funds. Evaluation helps us to document and learn from the innovative strategies grantees implement, to assess whether projected goals are met, and to learn about program implementation and effectiveness including the extent to which they yield positive labor force outcomes. This objective evaluation subsequently helps inform future program direction and funding decisions. DOL uses grant dollars not only to support innovative programmatic strategies, but also to learn from them so we can build knowledge about what works and ultimately to improve outcomes for those our grants serve. Therefore, as part of this effort, ETA may require all

or some portion of grantees to participate in a comprehensive and rigorous evaluation (refer to your program's FOA for program-specific evaluation requirements). This affects grantees in the following respects:

- By accepting grant funds from ETA, you have implicitly agreed, as a condition of the award, to participate in an evaluation by DOL, should your organization be selected for that purpose. Such evaluations may be carried out by an independent external evaluator selected by DOL (see grant Term #5 of your Grant Agreement).
- As a condition of accepting DOL grant funds, grant partner organizations must agree to participate in any evaluation that DOL undertakes.
- Throughout the period of performance, you may be required to maintain and share with the designated evaluators or relevant DOL personnel all collected data records, such as data on participants, employers, funding, and outcomes.
- Records about enrollment and training courses must be maintained at a participant level.

Key Takeaways About Evaluation

Acceptance of an ETA competitive grant requires full participation in any evaluation initiated by DOL as a condition to the award, as identified in your grant program's FOA.

Grantees may be required to maintain, and make available for the evaluation, records of individual participants (including PII), employers, and program operational and financial data.

Grantees may be required to provide access to program operating personnel, participants, and partners by the evaluation team.

- Where appropriate, you must also maintain personally identifiable participant information in secure conditions.
- DOL reserves the right to make publicly available the aggregate level results of the program evaluation and supporting aggregate data.

SECTION 6

Audit Phase

ETA grantees that expend \$750,000 or more in Federal awards (grants, cooperative agreements, and/or procurement contracts) in a fiscal year are subject to a <u>single audit</u> or <u>program-specific</u> audit.

- Single Audit: A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single audit conducted in accordance with 2 CFR 200.514 Scope of Audit except when it elects to have a program-specific audit conducted in accordance with paragraph (c) of this section. See 2 CFR 200.501.
- Program-Specific Audit: Applies when a grantee expends Federal awards under only one Federal program (excluding Research & Development) and the Federal program's statutes, regulations, or the terms and conditions of the Federal award do not require a financial statement audit of the auditee, the auditee may elect to have a program-specific audit conducted in accordance with 2 CFR 200.507.

Audit Exemption

ETA grantees expending less than \$750,000 during their fiscal year are not required to have an annual audit for that year, but must make their grant related records available for audit or review by the Office of Inspector General (OIG), Federal agency, its pass-through agency and/or the Government Accountability Office (GAO).

Audits as a Result of Oversight and Monitoring

Common Audit Findings

- ✓ Lack of Internal controls
- ✓ Lack of subrecipient monitoring and oversight
- ✓ Inadequate documentation to support charges
- ✓ Inaccurate financial reports
- ✓ Ineffective data collection systems
- ✓ Inadequate documentation of participant records and eligibility
- ✓ Lack of procurement policies & procedures

ETA Regional Offices are responsible for the oversight and monitoring of ETA grantees. When onsite monitoring reports result in questioned costs and other administrative findings, the Regional Office works with the grantee to resolve these findings during the life of the grant. If the Regional Office is unable to find a resolution, the report is elevated to the National Office for assistance with the resolution of the monitoring report following our resolution process outlined in 2 CFR 2900.22.

Office of Inspector General Program Audits

ETA grantees are also subject to OIG audits. The purpose of these audits is to provide recommendations for activities designed to promote economy, efficiency, effectiveness and to prevent and detect waste, fraud and abuse in DOL programs and operations. The OIG, through these audits, keeps the Secretary and Congress fully apprised of problems and deficiencies found as a result of these audits and DOL's progress for corrective action.

The specific DOL programs selected for audit are determined by risk reviews, hotline complaints, incident reports, congressional request or special investigations and are included in the IG's Annual work plan. Once a project is identified for audit, the OIG begins their work in the following phases:

- 1. Audit Initiation Notification of Audit through a letter to DOL and entrance conference;
- 2. Information Gathering Grantee site visits, interviews, data requests, conference calls, etc.;
- 3. Issue Statement of Facts A report of findings issued to DOL. DOL responds in writing to these Facts;
- 4. Issue Draft Report A draft report is issued to DOL and exit conference is held;
- 5. Issue Final Report The final report of recommendations, which includes DOL's response, is sent to the Assistant Secretary; and
- 6. Response to Final Report Management has 60 days to respond to the final report.

The final report will contain the OIG's recommendations. DOL is responsible for following up with the recommendations and reporting that information to the OIG. The OIG will review this information and determine if the recommendations are unresolved, resolved and/or closed. Program audits with grant specific findings and/or questioned costs are forwarded to the Division of Policy Review and Resolution for processing as outlined below.

Audit Resolution Process

Resolution is a collaborative process. It includes representation from the Regional Office, Program Office, OIG, Office of Employment and Training Legal Services and the OGM. There are several steps in the resolution process:

- 1. OIG pulls the **Final Audit Report** (FAR) from the Federal Clearinghouse. The OIG forwards the single and OIG audit to ETA/OGM via a formal memo. The OGM reviews the audit and memo for accuracy.
- 2. OGM forwards the FAR to the grant recipient within 5 days of receipt from the OIG. The grant recipient may submit documentation (to the Regional Office and the OGM) in response to the audit within 30 days prior to the issuance of the **Initial Determination (ID).** Note that the grantee has the option to work with the Regional Office or OGM for a resolution; documentation must be submitted by the grantee to both offices.
- Regional Office receives and reviews documents and provides recommendations to OGM for review. Note that the Regional Office is the first line of contact to receive and review supporting documentation from the grantee.
- 4. An ID is issued to the grantee 45 days from receipt of the FAR.
- 5. **The Informal Resolution** period begins 60 days from issuance of the ID During this period; the grant recipient has the opportunity to submit documentation. The Regional Office reviews the documentation and provides recommendations to OGM.

- 6. Office of Grants Management completes the **Final Determination (FD)** within 180 of receipt of the FAR.
- 7. The FD is transmitted to the grant recipient, with copies to the OIG, Regional Office, Program Office and to the Grant Officer. If the FAR contains questioned costs, a copy is provided to the ETA's Division of Accounting.
- 8. The **Final Determination** issued by the Grant Officer summarizes which findings are corrected or uncorrected, as well as any allowed, disallowed and/or questioned costs.

Time Limit

The requirements for audit resolution must be met within 180 days from the date the OIG issues the FAR to OGM to issue a FD for single audits. See 2 CFR 200.503(c).

After the Final Determination

- The Regional Office will follow-up with the grantee
 - o Uncorrected findings in the FD
 - o Provide technical assistance to help resolve uncorrected findings
- Disallowed costs are sent to ETA's Division of Accounting for debt collection
- Appeals are allowed and can lead to:
 - o Settlement, or
 - o Litigation before an Administrative Law Judge.

<u>Appeals</u>

- o Grantee rights to appeal are provided in the FD cover letter.
- Grantee must file an appeal within 21 days from the receipt of the FD.
- Appeals are sent directly to the United States Department of Labor, Office of Administrative Law Judges, by the grantee. See 2 CFR 2900.22.

Need More Detail?

✓ Audit requirements for organizations receiving Federal awards or subawards, are defined in 2 CFR 200.501 – 521: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at https://www.gpo.gov/fdsys/pkg/CFR-2014-title2-vol1-part200-subpartF.pdf

SECTION 7

CLOSEOUT PHASE

Once the grants period of performance ends, the grant moves to the closeout phase. The grant closeout phase is the period of time in which your Closeout Grant Officer, in cooperation with your FPO, reviews the grant's status to ensure that all of the required work under the grant is complete and that all outstanding financial and administrative obligations are met. During the closeout phase, grant recipients are only allowed to liquidate accrued expenditures for allowable charges incurred during the grant period of performance – not NEW obligations.

Your organization may not incur additional direct costs during the closeout period (i.e. after the

period of performance has expired).

The official closing of the grant only occurs after ETA personnel determine and certify that all required grant obligations and responsibilities are complete.

Step-By-Step Guide to the Closeout Process

At least seven days before the end of the grant's period of performance, a Grant Closeout Specialist from ETA's National Grant Closeout Unit will send electronic copies of the closeout notification and the grant closeout system end-user manual to your grant's Authorized Representative and/or to any other contacts provided for quarterly financial reporting purposes. This closeout notification message will contain the name, telephone

Please note that the closeout financial report (Closeout ETA-9130) is <u>a separate</u> document from the final financial report ETA-9130.

The final financial report ETA-9130 is **due** within 45 days of the expiration of your grant (or the end of the quarter in which you expended all remaining funds), following the same submission schedule as all other previous quarterly financial reports for your grant.

The closeout financial report (Closeout ETA-9130) is **due within 90 days** of the expiration date of your grant.

number, and e-mail address of the Closeout Specialist assigned for your grant closeout. Though Grant Closeout Specialist will be your primary point of contact during the closeout process, your FPO will be copied on this notification and will inform the Closeout Specialist of any period of performance extensions that may be in place for your grant. If your organization does not receive a closeout notification and a grant closeout system end-user manual before your grant expires, please alert your FPO immediately and your FPO will contact the Grant Closeout Unit. Please ensure that your FPO has the accurate email address for your organization's Authorized Representative at the time of closeout for proper notification.

Once your organization receives the closeout notification, you are expected to submit all required closeout documents via the on-line grant closeout system within 90 days of the grant's expiration date and send them by e-mail to your assigned Grant Closeout Specialist. Required closeout documents include a certified closeout financial report (Closeout ETA-9130), the closeout package (described in greater detail in the "Certification of Closeout Package" section below), and any other relevant supporting documents, such as a government property (list of equipment) inventory list and

indirect cost rate agreements and calculations (break down of calculations of costs by year), if applicable.

Certification of Closeout ETA-9130 Report: To certify your organization's closeout ETA-9130 report, the grant's Authorized Representative should first log into the Financial Reporting System and find the grant's final quarterly ETA-9130 report. He/she should then open the final ETA-9130 report (clicking *view/modify* to open) and then click on the hyper link "closeout" located in Box 6 of that report. Once the Authorized Representative verifies that all data in the closeout ETA-9130 report was entered correctly, he/she should certify the Closeout ETA-9130 report with your organization's PIN and then select the "Yes" option in Box 6 of the final ETA-9130 report. This information should then be submitted to the Financial Reporting System.

Certification of Closeout Package: To certify your organization's closeout package, the Authorized Representative will need to access the Grant Closeout System using the following URL: https://doleta.gov/grants/grant_closeout.cfm. S/he will then need to enter the same password used to log into the Financial Reporting System. Once on the home page, the Authorized Representative should click on the link "go to closeout grants" located in the upper right corner of the web page. Then select the appropriate grant number from the drop down menu and click to continue.

All required forms posted in the Grant Closeout System must be completed and submitted via the on-line system within 90 days of the expiration of your grant. They include the following forms, for:

Non-governmental grant recipients

- Grantee's Release
- Grantee's Assignment of Refunds, Rebates, and Credits
- Government Property Closeout Inventory Certification
- Grantee's Detailed Statement of Costs
- Grantee's Close-out Tax Certification
- Grantee Submittal of Closeout Documents

Governmental grant recipients

- Grantee Release
- Government Property Closeout Inventory Certification
- Grantee Submittal of Closeout Documents

Once you have submitted all of the required closeout documents, your Grant Closeout Specialist will conduct a financial analysis to determine whether or not your cumulative grant expenditures are in alignment with grant obligations by reviewing and reconciling all payments. The Closeout Specialist will also review your closeout documents and work with your FPO to ensure that the grant's administrative cost allocations are in compliance with stated limitations, any matching fund requirements were met, equipment purchases received prior approval, and any performance issues were resolved. Once the closeout process is complete, the Closeout Specialist will send a preliminary settlement notification e-mail informing the Authorized Representative that ETA has

officially closed the grant. Any unresolved issues discovered during this analysis may result in your organization owing a debt to the U.S. Government.

As noted in Section 3: You have 90 calendar days <u>after</u> the last day of the period of performance to charge the grant for allowable costs incurred <u>on or before</u> the last day of the period of performance. However, <u>no costs incurred after the last day</u> of the period or performance may be charged to the grant. This includes costs to close out the grant.

For additional information on closeout requirements, please visit 2 CFR 200.343.

Records Retention

Grantees must follow Federal guidelines on record retention, which require that financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient.

To view the Federal regulations, including related exceptions to the required time frame for retaining records, visit <u>2 CFR 200.333</u>.

APPENDIX A

GENERAL PARAMETERS GOVERNING THE USE OF ETA GRANT FUNDS

ETA grantees are responsible for adhering to a number of uniform regulations on the use of grant funds, which range from restrictions that apply to only one individual grant program to those that apply to all grant recipients of Federal funds. This section is intended to clarify the nature and scope of eligible grant uses – and the types of restrictions that you can most frequently expect to encounter as a grant recipient of ETA funds – so that you are more fully equipped to plan your grant activities and budget in alignment with existing requirements.

The Office of Management and Budget (OMB) completed the rule making process to combine the OMB Cost Principles and Administrative Guidance into one regulation – the Uniform Guidance (UG). The UG is located at 2 CFR 200 with the exceptions for DOL at 2 CFR 2900.

Cost Principles and Administrative Requirements (all ETA grantees)

Cost principles are a set of government-wide rules that apply to all ETA grantees, as outlined in 2 CFR 200 and 2 CFR 2900, that define the conditions under which educational institutions, non-profit organizations, and government agencies may charge costs within Federally-funded grants. (For-profit entities also follow these principles under DOL exception 2 CFR 2900.2.) These regulations provide guidance to help you determine whether specific planned expenditures are allowable, unallowable, or allowable with conditions. The core foundation of these government cost principles is the "prudent person" rule, meaning that he/she would find the costs to be reasonable, necessary, and allocable (of direct benefit) to the grant. Furthermore, the allocation of expenditures that your organization charges against a Federally-funded grant must be consistent with the way that your organization allocates expenditures across all of your programs.

Uniform Administrative Requirements, as stated in 2 CFR 200 and codified by ETA regulations at 2 *CFR 2900*, set forth standards for obtaining consistency and uniformity across Federal agencies in the administration of grants and agreements with state and local governments, hospitals, higher educational institutions, and other non-profit organizations. Provisions are applied by Federal agencies to grant recipients, who in turn apply the provisions to subcontractors performing substantive work under their grants and agreements. Topics covered under Uniform Administrative Requirements include, but are not limited to:

- Financial Management;
- Cost Sharing;
- Property Standards:
- Procurement;
- Records Access and Retention;
- Award Termination and Enforcement; and
- Closeout Procedures.

Specific Program Statutes

ETA operates under several pieces of authorizing legislation to administer its grant programs. While WIOA remains the source of authorizing legislation for the majority of ETA's grant programs, the range of legislative authority extends to the following statutes. Your organization should select the applicable statute based on your grant award:

- American Competitiveness and Workforce Improvement Act of 1998 (<u>Statute</u>)
- The Immigration and Nationality Act (Statute)
- The National Apprenticeship (Fitzgerald) Act of 1937 (Statute)
- The Wagner-Peyser Act of 1933 (105-220) (Statute)
- The Older Americans Act of 2006, Title V (<u>Amendments</u>) and Older Americans Act of 1965 (Statute)
- Work Opportunity Tax Credit (Statute)
- Unemployment Insurance (Statute)
- Workforce Innovation and Opportunity Act (Statute)

As discussed previously, each of these pieces of legislation may contain conditions or restrictions on fund use that are specific to that legislative authority, so it is important to familiarize yourself with the basic parameters that are associated with your particular grant program.

Agency-Level Requirements

Program Regulations

Program regulations are crafted and adopted by Executive Agencies such as ETA to implement a Federal statute or amend information in an established rule. The process used by Executive Agencies to implement statutes or amend existing rules is generally referred to as "rulemaking" and typically involves a lengthy and transparent process of public review and comment. You can track upcoming and expected regulatory activities by consulting the list that ETA updates regularly throughout the year, found at: http://www.doleta.gov/reports/dpld_regulatory.cfm.

To determine which program regulations are applicable, you should refer to the grant's terms and conditions, as described in the Grant Award Package. Additional questions should be forwarded directly to your FPO.

ETA Advisories

ETA uses its Advisory system to disseminate the Agency's interpretations of Federal laws, procedures, administrative requirements, and other relevant technical information to state workforce agencies, direct grant recipients, and other appropriate stakeholders. Advisories, searchable by year, may be viewed and downloaded from http://wdr.doleta.gov/directives/.

Of particular importance to grantees are the following types of advisory notices:

- Training and Employment Guidance Letters (TEGLs) transmit policy and operational guidance. These have the force of regulation and must be followed.
- Training and Employment Notices (TENs) communicate announcements of meetings, publications, or general information. These are informational in nature.
- Unemployment Insurance Program Letters (UIPLs) provide policy and technical quidance specific to the UI program.

Complaint and Appeals Process

Most grantees are required to implement a process to review and respond to any complaints received from program applicants, program participants, and other interested parties. Many grantees choose to comply with this requirement by including in orientation packets information about how to submit a complaint and by making copies of complaint procedures available at customer-friendly locations, such as front desks or welcoming areas, as appropriate. In all cases, grantees are expected to make "reasonable efforts" to ensure that information about the complaint process is accessible to and easily understood by all stakeholders.

To determine if this is required for your grant program please contact your FPO.

WIOA Grant Recipients

As grant recipients of funds from a grant program that operates under WIOA authority (e.g., WIOA Adult, WIOA Dislocated Worker, WIOA Youth, National Farmworker Jobs Program, Indian and Native American Program, YouthBuild, National Emergency Grants, and WIOA pilot and demonstration grants such as Reentry Employment Opportunities and the Workforce Innovation Fund) will find most of the pertinent information about complaint and appeals procedures in WIOA Section 181(c) and the WIOA regulations at 20 CFR 667.600. The primary exception involves complaints of discrimination, which are handled by DOL's Civil Rights Center. The home page for the Civil Rights Center is: http://www.dol.gov/oasam/programs/crc/. Specifics about the process for pursuing discrimination-related complaints are located in WIOA Section 188 and/or 29 CFR part 37.

SCSEP Grant Recipients

SCSEP grantees must follow the grievance and appeal process described in the Older Americans Act and its regulations (20 CFR 641.910). Steps involved in your grievance process must be outlined in your grant plan. If you receive a complaint from an applicant, program participant, or other interested party, you have up to 60 days from the date the complaint was filed to review the complaint and respond to the individual making the complaint. Individuals who do not receive a decision within 60 days from the date the complaint was filed have the right to

appeal to ETA. ETA will investigate the case to determine if grievance procedures were followed and determine whether there was a violation of Federal law. Appeals may be sent to the Employment and Training Administration, Office of Workforce Investment, 200 Constitution Avenue, NW, Room C-4510, Washington, DC, 20210.

Other Grant Recipients

Most grants (but not all) that are not authorized under WIOA still incorporate the WIOA administrative requirements, including grievance and complaint procedures, into the Grant Agreement. Grantees should review their grant award package thoroughly for information regarding specific complaint and grievance requirements. If grantees are not clear on such requirements, they should reach out to their FPOs for further guidance.

Special Requirements for Grantees Handling Complaints from Migrant/Seasonal Farmworkers in the Job Service Complaint System

Any individual, organization, or employee is entitled to submit a complaint from or on behalf of a migrant or seasonal farmworker in the Job Service Complaint System provided that the complaint alleges that a job service agency, an employer, or both have failed to comply with applicable job service (Employment Service) regulations. For instance, a farmworker may file a complaint because he/she was referred to a job and the employer did not pay the agreed upon wages. A farmworker might also file a complaint because the workforce system staff referred him/her to a lower-quality job than a non-farmworker. Grantees that receive farmworker complaints about workforce system actions should handle those complaints as they would other workforce system complaints. The state workforce agency should take, in writing, any complaints from migrant or seasonal farmworkers that allege violations of employment-related laws that are enforced by DOL's Wage and Hour Division (WHD) or Occupational Safety and Health Administration (OSHA), and it should refer the complaint to the appropriate regulatory agency for further action and resolution. The State Monitor Advocate will follow-up on these complaints to resolution. All other complaints alleging violations by employers of employment-related Federal, state, or local laws are logged by the state workforce agency and the complaints are referred to the appropriate enforcement agency. Complaints alleging that an eligible U.S. worker was discouraged from applying for a position, was not hired, was unfairly discharged from a position, or was otherwise discriminated against because of his/her immigration status by an H-2A³ employer, may be referred to the United States Department of Justice, Civil Rights Division, Office of Special Counsel for adjudication in addition to any activity, investigation, and/or

³ The H-2A temporary agricultural program allows agricultural employers who anticipate a shortage of domestic workers to bring nonimmigrant foreign workers to the U.S. to perform agricultural labor or services of a temporary or seasonal nature.

enforcement action taken by WHD or the state workforce agency. Further information and training about the Job Service Complaint System is available at https://www.WorkforceGPS.org/view/1001306643662117435/info or on the WorkforceGPS Agricultural Connections Resource Page at https://farmworker.workforcegps.org/.

APPENDIX B

ETA NATIONAL TOLL-FREE HELPLINE

1-877-US-2JOBS (1-877-872-5627)

TTY: 1-877-889-5627

Hours: Monday through Friday, 8 a.m. to 11 p.m. ET

ETA maintains a National Toll-Free Helpline to provide all Agency stakeholders with a reliable resource of consistent, accurate, and current information and assistance regarding its workforce initiatives and related support activities. English and Spanish speaking operators are available to answer any general questions concerning ETA programs and services or direct callers to the appropriate subject matter expert. Translation services for many other languages also are available upon request.

APPENDIX C

ELECTRONIC TOOLS GUIDE

The Department of Labor's electronic tools assist millions of Americans every month with their employment-related needs. These Web-based tools provide solutions for unemployed workers, career counselors, economic developers, educators, parents, students, businesses, workforce professionals, and job seekers.

America's Service Locator (www.servicelocator.org) connects people to local offices that provide employment and training services. It provides maps and driving directions to the nearest American Job Center, as well as unemployment insurance filing assistance. America's Service Locator has information on more than 20,000 local resources and offices for a variety of relevant services.

CareerOneStop (www.CareerOneStop.org) includes tools to help job seekers explore careers, investigate salary and benefit information, research education and training opportunities, plan a job search and browse job sites, write and improve resumes and cover letters, and prepare for a job interview. In addition, the CareerOneStop Web site provides links to national and state workforce and labor market information Web sites that contain local information resources and tools.

Competency Model Clearinghouse (www.careeronestop.org/competencymodel/) is designed to assist users in developing and utilizing competency models and career ladder/lattices for sector strategies. Guides contain background information, resources, and examples of uses, and can be used in worksheets or interactive tools on the site to develop curriculum, assess skill gaps and related workforce applications.

My Next Move (www.MyNextMove.org) gives individuals three ways to explore careers, including an on-line O*NET interest assessment. It provides an easy-to-read, one-page profile of each occupation explored, highlighting important knowledge, skills, abilities, technologies used, simplified salary and outlook information, and links to find specific training and employment opportunities.

My Next Move for Veterans (www.MyNextMove.org/VETS) is designed for U.S. Veterans making the transition to civilian careers. It provides tasks, skills, salary information, job listings, and more for over 900 different careers. Veterans can find careers through keyword searches, by browsing industries that employ different types of workers, or by entering their military occupation code or title.

mySkills myFuture (www.mySkillsmyFuture.org) enables job seekers and intermediaries to match a worker's occupational skills and experiences with the skills needed in other occupations in order to facilitate career mobility and improve economic prospects, particularly for dislocated workers. For any occupation, users can find job listings in their local areas (by state or zip code) and click directly through to the hiring company's Web site. mySkills myFuture is designed for use as either a self-help tool or with the assistance of expert advisers.

O*NET On-line (<u>www.oneton-line.org</u>) provides extensive information on the requirements and characteristics of over 900 occupations including identifying the latest technological skills along with describing the tasks, work activities, and general knowledge, skills and abilities used in those

careers. It is particularly useful for writing skills-based resumes for job seekers, and skills-based job postings and position descriptions for businesses.

ApprenticeshipUSA (www.dol.gov/featured/apprenticeship) provides a wealth of information about registered apprenticeships for employers and workers alike. Resources include A Quick Start Toolkit for employers looking to build registered apprenticeship programs; a database of current registered apprenticeship sponsor contacts by state and occupation; the Federal Resources Playbook of federal funds that can be leveraged to support registered apprenticeship; apprentice and employer testimonials, and many more!

Veterans ReEmployment Portal on CareerOneStop (www.CareerOneStop.org/Vets) is designed to provide Veterans with employment, training, career planning, and financial and emotional assistance after military service. The site links Veterans to local resources as well as provides a military-to-civilian job search based on military job title or military occupation code.

Virtual Career Network (www.vcn.org) provides career exploration and training tools to help job seekers prepare for careers in healthcare, green jobs, and transportation. Job seekers can explore careers in those fields, identify education and training programs, access on-line courses, document their learning and experience to obtain credit for prior learning, and search for local jobs.

Worker ReEmployment Portal on CareerOneStop (www.CareerOneStop.org/Reemployment) is designed to assist impacted workers following job loss and to connect laid-off workers to needed resources for training, reemployment, career planning, and financial and emotional help during the process of job transition. The site also now includes a job search by location feature.

WorkforceGPS (www.WorkforceGPS.org) is an interactive online communication and learning technical assistance (TA) platform that was designed to communicate with and build the capacity of the public workforce investment system to develop and implement innovative approaches to workforce and economic development in the 21st century economy. This website, which offers resources and peer-to-peer connections, supplements other TA provided by ETA's national and regional staff to help the public workforce system, education professionals, and business.

Mi Proximo Paso (www.miproximopaso.org) is the Spanish-language version of My Next Move and gives individuals three ways to explore careers, including an on-line O*NET interest assessment. It provides an easy-to-read, one-page profile of each occupation explored, highlighting important knowledge, skills, abilities, technologies used, simplified salary and outlook information, and links to find specific training and employment opportunities.

What's My Next Move Guide (www.careeronestop.org/whats-my-next-move.aspx/) is a printable guide that includes seven easy steps to help students plan a career path after high school graduation. It was developed as a resource to connect young people to on-line career exploration resources available from the Department of Labor. The guide encourages students to think and make decisions about their futures and to engage with career counselors, workforce professionals, teachers, and parents/guardians.

Business Center on CareerOneStop (<u>www.careeronestop.org/BusinessCenter</u>) contains information on recruiting and hiring a skilled workforce, links to local training and educational

institutions, a civilian to military "crosswalk" to assist in recruiting Veterans, information about workforce certifications, and a job description writer.

Mobile Versions of E-Tools: Five of the most popular E-Tools are now available for customers to access using any brand of smart phone or tablet:

- 1) Find an American Job Center (www.careeronestop.org/JobCenterSearch) allows users to quickly locate and contact their nearest American Job Center.
- 2) Find a Job (<u>www.careeronestop.org/JobSearch</u>) lets users search job listings in any local U.S. area. Job listings are updated daily and can be searched by job type or keyword within a city, state, or ZIP code.
- 3) Veterans Job Search (www.careeronestop.org/VeteransJobSearch) matches military job experience to civilian careers and then displays local job listings for those careers. Users search by their military job titles or their MOC/MOS codes and can view job listings by city, state, or ZIP code.
- 4) Salary Finder (<u>www.careeronestop.org/SalaryFinder</u>) provides average hourly wages or annual salaries by occupation and location. The data come from the Bureau of Labor Statistics' Occupational Employment Statistics program.
- 5) **Training Finder** (www.careeronestop.org/TrainingFinder) allows users to locate education and training programs in their local areas. Users search by occupation, program, or school and find contact information for programs.

Automatic Spanish Language Translations: In response to customer feedback, several E-Tool Web sites now have an automatic translation feature that allows users to quickly translate the pages into Spanish. The translation feature appears in the upper right corner of the following Web sites:

- 1) **CareerOneStop** (<u>www.careeronestop.org</u>) is a one-stop, on-line site for job search, career and training tools, and resources.
- 2) **Worker ReEmployment** (<u>www.careeronestop.org/ReEmployment</u>) provides employment, training, and financial assistance for laid-off workers.
- 3) **Veterans ReEmployment** (<u>www.careeronestop.org/ReEmployment/veterans</u>) provides employment, training, and financial help after military service.
- 4) **mySkills myFuture** (<u>www.myskillsmyfuture.org</u>) helps laid-off workers and other career changers find new occupations to explore.

APPENDIX D

RESOURCES AND CONTACTS

Resources for ETA Competitive Grants

To assist you during the period of performance with program design, ETA has developed several toolkits and helpful resources.

- Apprenticeship USA Toolkits
 - Resources to introduce you to apprenticeship along with its benefits for employers, workers, and the workforce system.
 - www.dol.gov/apprenticeship/toolkit.htm
 - o www.doleta.gov/oa/employers/apprenticeship toolkit.pdf
- Career Pathways Toolkits
 - Features key elements to help guide state and local teams develop a comprehensive career pathways system.
 - wdr.doleta.gov/directives/attach/TEN/TEN_17-15_Attachment_Acc.pdf
 - www.careerpathways.workforcegps.org/announcements/2016/02/05/14/21/T he-Release-of-the-Career-Pathways-Toolkit-A-Guide-for-System-Development
- Sector Strategies Toolkit
 - To guide workforce organizations to more effectively operationalize sector strategies.
 - www.businessengagement.workforcegps.org/resources/2016/04/12/13/53/S
 ector-Strategies-Implementation-Framework
- Competency Model Clearinghouse
 - To assist users with the development of competency models and career ladder/lattices.
 - www.careeronestop.org/competencymodel
- Financial Management and Other Online Training
 - Contains more than 25 online training modules from ETA.
 - www.workforcegps.org/online-training
- Get my Future
 - Getmyfuture.org is a web-based portal, sponsored by CareerOneStop that connects young adults to career, education, and job search resources.
 - Features include an interest assessment, occupation profiles, success story videos, tips, worksheets and more
 - o www.getmyfuture.org

Agency Contact Center Hours

Agency

Toll-Free Number

Contact Center Number 1-866-4-USA-DOL (1-866-487-2365)

Hours: Monday to Friday, 8 a.m. to 8 p.m. ET (General DOL Inquiries)

Employment and Training 1-877-US-2JOBS (1-877-872-5627)

Administration (ETA) Hours: Monday to Friday, 8 a.m. to 11 p.m. ET

1-800-733-JOBS (1-800-733-5627) Job Corps (JC) Hours: 24 hours a day, 7 days a week

Mine Safety and Health 1-800-746-1553

Administration (MSHA) Hours: 24 hours a day, 7 days a week Occupational Safety and 1-800-321-OSHA (1-800-321-6742) Health Administration (OSHA) Hours: 24 hours a day, 7 days a week Office of Disability Employment 1-866-ODEP-DOL (1-866-633-7365)

Policy (ODEP) Hours: Monday to Friday, 8 a.m. to 11 p.m. ET

Office of Small and

Disadvantaged Business 1-888-9-SBREFA (1-888-972-7332)

Utilization Hours: Monday to Friday, 8 a.m. to 8 p.m. ET

(OSDBU)

Veterans' Employment & 1-866-237-0275

Training Services (VETS) Hours: Monday to Friday, 8 a.m. to 8 p.m. ET Service Desk

1-800-827-5335 Women's Bureau (WB)

Hours: Monday to Friday, 8 a.m. to 8 p.m. ET

Speech and Hearing Impaired

Contact Center TeleType 1-877-TTY-5627 (1-877-889-5627)

Number (General DOL Hours: Monday to Friday, 8 a.m. to 8 p.m. ET

Inquiries)

Additional Agencies

1-202-693-6500 Civil Rights Center (CRC)

Hours: Monday to Friday, 8:00 a.m. to 5:00 p.m. ET

Employee Benefits Security 1-866-444-3272

Administration (EBSA) Hours: Monday to Friday, 8:15 a.m. to 4:45 p.m. ET Office of Labor-Management 1-202-693-0123

Standards (OLMS) Hours: Monday to Friday, 8:00 a.m. to 5:00 p.m. ET

Office of Workers' 1-202-693-0040 Compensation Programs

Hours: Monday to Friday, 8:30 a.m. to 4:45 p.m. EST (OWCP)

1-866-US-WAGE (1-866-487-9243) Wage and Hour Division

(WHD)

Hours: Monday to-Friday, 8:30 a.m. to 4:45pm EST

OIG Hotline (DOL) 1-800-347-3756

Grant Program Mailboxes

ETA established convenient electronic mailboxes for each competitively-awarded grant program. If your FPO has asked you to contact the National Program Office directly, or if you have been prompted to contact the National Program Office in response to one of their formal training events, please use the following program-specific mailbox addresses or portals to submit your question or correspondence:

- Career Pathways for Youth (CPY): cpy@dol.gov
- H-1B American Apprenticeship Initiative (AAI): apprenticeship.grantseta@dol.gov
- H-1B America's Promise: americaspromise@dol.gov
- H-1B Make It In America (MIIA): jobsaccelerator@dol.gov
- H-1B Ready To Work: <u>RTW@dol.gov</u>
- H-1B TechHire: techhire@dol.gov
- H-1B Strengthening Working Families Initiative (SWFI): <u>SWFI@dol.gov</u>
- Indian and Native American Programs (INAP): <u>DINAP@dol.gov</u>
- National Farmworker Jobs Program: NFJP@dol.gov
- Reentry Employment Opportunities: reo@dol.gov
- SCSEP: TBD
- State Expansion/State Accelerator Apprenticeship Grants: apprenticeship.grants-eta@dol.gov
- TAACCCT: taaccct@dol.gov
- Workforce Innovation Fund: workforce.innovation@dol.gov
- YouthBuild: youth.build@dol.gov
- Youth Career Connect: ycc@dol.gov

Incoming messages sent to these mailboxes are monitored on a continuous basis, and inquiries are routed to the appropriate individual(s) to ensure prompt response. Additional Mailboxes are created on an as needed basis.

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APPENDIX E

Glossary of Acronyms

AAI – American Apprenticeship Initiative

AJC - American Job Center

CBO - Community Based Organizations

CFDA - Catalog for Federal Domestic Assistance

CY - Calendar Year

DINAP- Division of Indian and Native Americans

DNPTTA- Division of National Programs, Tools, and Technical

Assistance

DOL - Department of Labor

DSI- Division of Strategic Investments

DUNS - Data Universal Numbering System

DWASWS- Division of WIOA Adult Services and Workforce System

DYS- Division of Youth Services

EEO - Equal Employment Opportunity

EIN - Employer Identification Number

ETA – Employment and Training Administration

ETO - Employment & Training Order

FFATA - Federal Funding Accountability and Transparency Act

FOA – Funding Opportunity Announcement

FPB - Frances Perkins Building

FPO – Federal Project Officer

FY - Fiscal Year

GAO - General Accounting Office

GEMS – Grants e-Management System

GMS - Grant Management Specialist

GO - Grant Officer

ICR - Information Collection Request

ID - Initial Determination

IGO - Intergovernmental Organization

INAP - Indian Native American Programs

IP - Intellectual Property

JC – Job Corps

LMI - Labor Market Information

MOU - Memorandum of Understanding

MSFW – Migrant Seasonal Farmworkers

NFJP – National Farmworker Jobs Program

NICRA - Negotiated Indirect Cost Rate Agreement

NO - National Office

NOA - Notice of Award

NOA - Notice of Award

OA – Office of Apprenticeship

OAA - Older Americans Act

OGM - Office of Grants Management

ORM – Office of Regional Management

OIG – Office of Inspector General

OMB - Office of Management & Budget

OSHA – Occupational Safety and Health Administration

PII - Personally Identifiably Information

PO - Program Office

PRA - Paperwork Reduction Act

PY - Program Year

RA – Registered Apprenticeship

RO - Regional Office

RTW - Ready To Work

SAE – ApprenticeshipUSA State Expansion Grants

SAM - System for Award Management

SF - Standard Form

SWA - State Workforce Agency

SWFI – Strengthening Working Families Initiative

TA - Technical Assistance

TAACCCT – Trade Adjustment Assistance Community College and Career Training

TEGL - Training & Employment Guidance Letter

TEIN -Training & Employment Information Notice

TEN -Training & Employment Notice

TIN - Taxpayer Identification Number

VETS- Veterans Employment and Training Services

WDB - Workforce Development Board

WIOA - Workforce Innovation and Opportunity Act

YB - YouthBuild

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