Effectively Managing ETA Competitive Grants

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. Last Update: June 2018*

Employment and Training Administration Grantee Handbook

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WELCOME!

Congratulations on receiving a competitive grant from the Department of Labor's (DOL) Employment and Training Administration (ETA). You have recently received one of ETA's numerous grants that all together provide job training, career pathways, credential attainment, and employment opportunities to millions of customers seeking employment and training services in the United States. Per the Immigration Reform and Control Act, all customers of ETA funded workforce development services and activities must have authorization to work in the United States of America. We recognize that administering grants can be an overwhelming responsibility; therefore, 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	 Describes how ETA's Regional and National Offices work together to manage competitively awarded grants. The roles and responsibilities of ETA staff during the grant life cycle. 		
2. An Overview of Award Documents, Grantee Obligations, and Regulatory Requirements	 Walks through the content of each document included in your Grant Award 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	 Describes the process and provides a list of information 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;
- Specific information 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 – *How to Manage Your Period of Performance.*

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).

One-Stop Financial Management TAG - Financial Management TAG

Uniform Guidance and Grants Management Training: https://grantsapplicationandmanagement.workforcegps.org/

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 best access ETA assistance, this section contains:

- A bird's eye view of ETA's primary purpose in administering competitively-awarded employment and training grants; and
- **Definitions of the specific roles and responsibilities** carried out by each organizational arm of ETA's grant management team.

<u>Purpose</u>

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 – Pre-Award, Award, Period of Performance, and Post Performance. 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 (OGM), and National Program staff in ETA's program offices. Depending on your grant program, you will also interact with a technical assistance coach who can assist with grant implementation strategies.

Role of Federal Project Officer

As a grantee, your FPO is located in one of ETA's six Regional Offices (RO) or ETA's National Office (NO), and 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 contact when questions or issues arise related to your grant that need technical assistance, clarification, or resolution.

Your FPO will review your quarterly programmatic and financial reports and will follow up 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 also work with you on any modifications. Please see Section 4 – Modifying Grants 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.

FPOs will coordinate with the regional fiscal staff regarding oversight, technical assistance, and web-based and/or face-to-face training, if available on financial management. (A comprehensive overview of the grant monitoring process is offered in Section 3- How to Manage Your Period of Performance.)

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.

Resource: http://www.doleta.gov/regions/

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 (FOA) (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 (Note: The National Grant Officer relies on the Regional Grant Officer to upload all executed grant actions into E-grants);
- Approve modifications to grant statements of work, negotiated indirect cost rate agreements, 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, and/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 SOW, 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 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 Grant Award package and understand all components from vision, partnerships, program design, service strategies, planned deliverables and outcomes and, 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 and Conditions of Award, and Attachments:

- A SF-424: Application for Federal Assistance;
- **B** SF-424A: Budget Information Form;
- **C** Budget Narrative;
- **D** Statement of Work (consists of Project Narrative and Attachments); and if applicable
- **E** Federally approved Negotiated Indirect Cost Rate Agreement or Cost Allocation Plan.

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. Your FPO will assist you in the resolution of any Conditions of Award. Direct questions pertaining to these conditions to your FPO.

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:

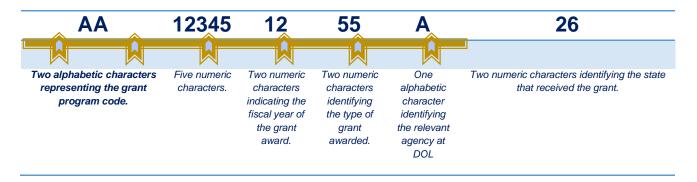


Figure 1: Breakdown of FAIN/Grant Number

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 the instructions carefully and establish your PMS account as soon as possible. You will not have access to your funds until the steps in the grant award letter are complete. **Note**: First-time grant recipients must also complete and send back a direct deposit form that will align with the PMS account. Direct issues related to establishing an account to the PMS help desk (1-877-614-5533 or <u>PMSSupport@psc.gov</u>). You are encouraged to copy your assigned FPO on emails to the PMS help desk.

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 the Federal Award Identification Number (FAIN);
- Period of Performance;
- Award amount;
- Pertinent regulations and cost principles that your grant is subject to and which your organization must comply; and
- The Grant Officer assigned to your grant.

Note: See Appendix A for the General Parameters Governing the Use of ETA Grant Funds, including links to useful reference tools that will assist in complying with the required Uniform Administrative Requirements, Cost Principles, and Audit requirements for Federal Awards; Uniform Guidance at 2 CFR Part 200 and OMB; and, it's approved exceptions for DOL at 2 CFR Part 2900.

Terms and Conditions

This section lists a few terms and conditions within the grant agreement that your organization agreed to follow when applying for your grant. These terms vary depending on the type of grant your organization received, so it is important that your organization review this section of the Grant Agreement. Below, you will see a sample table of contents from a grant package.

2018 TERMS AND CONDITIONS LIBRARY

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Figure 2: Sample of Terms & Conditions Table of Contents

Listed below are some, not all, important Terms and Conditions of Award included in your grant award package:

- A. Funding Opportunity Announcement
- B. Indirect Cost Rate and Cost Allocation Plan
- C. Return of Funds NEW
- D. Administrative Costs
- E. Audits
- F. Creative Commons Attributions License
- G. Equipment
- H. Intellectual Property Rights
- I. Procurement
- J. Reports
- K. Program Requirements
- L. Provide Certain Information in Public Communications (Steven's Amendment) NEW
- M. Salary and Bonus Limitations
- N. Public Policy (Veterans' Priority Provisions)

The standard terms and conditions template, can be found at:

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

A. Funding Opportunity Announcement

Your grant was awarded based on your application to the FOA and a link to the FOA can be found in your Grant Agreement. The FOA is one of the important reference tools in navigating your grant program. The FOA describes the broad-based requirements for grant activities. Your application (especially the Statement of Work (SOW), Project Budget (SF-424A and Budget Narrative)) provides ETA with the specific roadmap for your project's implementation. ETA expects that you will adhere to your SOW and project budget, and that they will align with the FOA. 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 <u>North</u> <u>American Industry Classification System</u> (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 and consult with your FPO 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 (AJC)</u>, and/or local, municipal, or state agencies). We encourage you to engage the system in one or more of the following ways:

- o Identifying, assessing, and referring candidates for training;
- Connecting trainees/workers with employers;
- o Providing supportive services for qualified individuals, where appropriate;
- Leverage AJC resources such as Labor Market Information (LMI), employer contacts, co-enrollment; 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 the FOA requirements, 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 - Key *Partner Responsibilities* 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			•			
Identify 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 current Federally approved Negotiated Indirect Cost Rate Agreement (NICRA) or Cost Allocation Plan (CAP), please review your Grant Agreement to ensure it is 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. The award recipient elected to exclude indirect costs from the proposed budget. Please be aware that incurred indirect costs (such as top management salaries, financial oversight, human resources, payroll, personnel, auditing costs, accounting and legal, etc. used for the general oversight and administration of the organization) must not be classified as direct costs; these types of costs are indirect costs. Only direct costs, as defined by the Cost Principles in the Uniform Guidance, will be charged. According to 2 CFR 200.412, if indirect costs are misclassified as direct costs, such costs may become disallowed through an audit.
- d. If your organization elected to use the 10% *de minimis* rate per 2 CFR 200.414, this should be noted in your Grant Agreement.

Note: You may have a Condition of Award to address Indirect Costs if the following occurred: 1) claiming indirect costs, but failed to submit a NICRA, 2) the NICRA you submitted expired, or 3) it was unclear that you were electing to use the de minimus rate. Please review your grant award documents carefully to ensure you are in compliance with the Indirect Costs requirements.

For additional information on indirect costs, please visit ETA's Office of Cost Determination website at <u>https://www.dol.gov/oasam/boc/dcd/</u>. Frequently asked questions can be found here: <u>https://www.dol.gov/oasam/FAQs/FAQ-dcd.pdf</u>.

C. Return of Funds - NEW

The U.S. Department of Labor, Employment & Training Administration is no longer accepting paper checks for any type of returned funds. All return of funds are to be submitted electronically through the Payment Management System (PMS) operated by the U.S.

Department of Health and Human Resources via the same method as a drawdown. If there are questions regarding the return of funds or your organization no longer has access to PMS, contact the U.S. Department of Labor/ETA Office of Financial Administration via email at: <u>ETA-ARteam@dol.gov</u> for further assistance.

D. Administrative Costs

Administrative cost limits vary depending on the program. It is very important to review your FOA and Grant Agreement to determine if your Grant Agreement contains administrative cost limitations. Grantees are required to track and report administrative cost expenditures each quarter on the ETA-9130 Financial Report.

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 <u>http://www.workforcegps.org</u>. You can take advantage of the financial training tutorials accessible under the Financial Management section of <u>https://www.workforcegps.org/online-training</u>.

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

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 Subpart F of the Uniform Guidance. 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 the entity's fiscal year undergo a single audit procedure that satisfies the requirements of all sponsoring Federal agencies. The term non-Federal entity and the application of Subpart F of the Uniform Guidance extends to not only States, local governments, Indian tribes, institutions of higher education, and non-profit organizations, but also for-profit entities, foreign public entity, and foreign organizations (2 CFR 2900.2) These audits are conducted by an independent, non-Federal auditor (a licensed CPA), and the results of the audit are submitted to a Federal Audit Clearinghouse so that any Federal

agencies can access them with the exception of for-profit organizations. These single audits should be remitted straight to ETA's National Office. Occasionally, your organization may also be asked to participate in supplementary audits by other Federal entities, such as the Office of the Inspector General (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 from the date it was accepted into the Federal Audit Clearinghouse. See Section 6: Audit Phase for details.

F. Creative Commons Attributions License

As required at 2 CFR 2900.13, any intellectual property developed under a competitive award process must be licensed under a Creative Commons Attribution 4.0 (CC BY) license, which allows subsequent users to copy, distribute, transmit and adapt the copyrighted work and attribute the work in the manner specified by the recipient. For general information on CC BY, please visit <u>http://creativecommons.org/licenses/by/4.0</u>. Instructions for marking your work with CC BY can be found at http://creativecommons.org/licenses/by/4.0. Instructions for marking your work with a CC license

http://wiki.creativecommons.org/Marking_your_work_with_a_CC_license.

G. 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 written approval is always required for equipment purchases, even if the request to purchase equipment is already specified in your SOW and/or budget as specified in 2 CFR 2900.9. This requirement applies to equipment purchased directly with grant funds, as well as subrecipient 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 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 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. Equipment purchase approval will come in the form of a modification to your grant.

IMPORTANT NOTE ABOUT YOUR GRANT'S BUDGET:

Pursuant 2 CFR 2900.1, approval of the budget as awarded does not constitute prior approval of those items specified in the Uniform Guidance at 2 CFR 200.407 or your grant award as requiring prior written approval.

How to Submit an Equipment Purchase Request to your FPO

Step 1: Call your FPO to discuss your request.

Step 2: Prepare the request for submission using 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:
 - o Item name;
 - o 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
 - o Any other information requested by your FPO/ETA.

Step 3: Submit the official request:

 Contact your FPO for specific guidance on how to submit your request as submission requirements may vary by Region.

H. Intellectual Property Rights

The Federal Government reserves a paid-up, nonexclusive and irrevocable license to reproduce, publish or otherwise use, and to authorize others to use for federal purposes: i) the copyright in all products developed under the grant, including a subgrant or contract under the grant or subgrant; and ii) any rights of copyright to which the recipient, subrecipient or a contractor purchases ownership under an award (including but not limited to curricula, training models, technical assistance 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. Federal funds may not be used 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, although they may be used to pay costs for obtaining a copy which is limited to the developer/seller costs of copying and shipping. If revenues are generated by selling products developed with grant funds, including intellectual property, these revenues are considered as program income. Therefore, program income must be used in accordance with the provisions of this grant award and 2 CFR 200.307.

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 recipient and does not necessarily reflect the official position of the U.S. Department of Labor. The 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."

I. Procurement

The Uniform Administrative Requirements for procurement are found at 2 CFR 200.317- 326 and key staff should be familiar with them. For example, 200.317 requires states to follow the same policies and procedures it uses for non-Federal funds; 200.319 requires that all procurement transactions be conducted in a manner providing full and open competition; 200.326 requires that every contract include specific clauses and 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.

J. Reports

Your organization is required to submit quarterly financial and programmatic reports. These reports are due no later than 45 calendar days after the end of each quarter. See Section 3 – *How to Manage Your Period of Performance* 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 (WIOA) funded workforce development system and its performance outcomes in your State's Workforce Development System. State Workforce Investment Act (WIA) (previous authorizing legislation) and WIOA performance information is available at https://doleta.gov/performance/results/.

K. Program Requirements

The FOA contains the program requirements for this award and will vary depending on program type. For instance, <u>matching funds and leveraged resources</u> are program-specific requirements and is an example of a Program Requirement that may apply to your grant and as a result be included in your grant terms and conditions.

Matching (cost sharing) fund requirements apply when a financial match is either required by statute or is contained in the Grant Agreement and FOA 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, in accordance with the Uniform Guidance 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.

Note: During the life of the grant and at closeout, ETA will examine the match requirement (which the ETA-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 are used for allowable activities under the grant, 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. The ETA-9130 quarterly financial report contains definitions of and descriptions for reporting leveraged resources.

L. Requirement to Provide Certain Information in Public Communications

Pursuant to P.L. 115-141, Division H, Title V, Section 505, when issuing statements, press releases, requests for proposals, bid solicitations and other documents describing projects or programs funded in whole or in part with Federal money, all non-Federal entities receiving Federal funds shall clearly state:

1. The percentage of the total costs of the program or project, which will be financed with Federal money;

2. The dollar amount of Federal funds for the project or program; and

3. The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.

The requirements of this part are separate from those in the Uniform Guidance and, when appropriate, both must be complied with.

M. Salary and Bonus Limitations

Pursuant to P.L. 115-141, Division H, Title I, Section 105 recipients and subrecipients shall not use funds to pay the salary and bonuses of an individual, either as direct costs or as indirect costs, at a rate in excess of Executive Level II. The Executive Level II salary may change yearly and is located on the OPM.gov website http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages. The salary and bonus limitation does not apply to contractors (vendors) providing goods and services as defined in 2 CFR 200.330. Where States are recipients of such funds, States may establish a lower limit for salaries and bonuses of those receiving salaries and bonuses from subrecipients of such funds, taking into account factors including the relative cost-of-living in the State, the compensation levels for comparable State or local government employees, and the size of the organizations that administer Federal programs involved including Employment and Training Administration programs.

N. Public Policy (Veterans Priority Provisions)

The Jobs for Veterans Act (Public Law 107-288) 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 <u>20 CFR Part 1010</u>.

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. See Section 4 – *Modifying Grants* of this Handbook on how to submit a request for a grant modification.

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

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

Attachment D - 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 FOA and includes the Project Narrative and all required and requested attachments, such as the abstract and letter(s) of commitment, if applicable. For grants that are awarded competitively in one year and funded incrementally in future years, the SOW is obtained from their original application.

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 period unless you request and receive approval for a modification to your period of performance from the Grant Officer. Modifications to extend the period of performance must be discussed with your FPO prior to submission.

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

Grantees that have a preliminary phase of grant implementation (three months to one year, depending on your particular grant program) 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 (PMS) and E-Grants system for funding drawdowns and financial reporting.

Programmatic Compliance Review Phase

Prior to or soon after grant award, the Program Office in coordination with OGM may conduct a compliance review of the grantee's SOW and project budget to identify any issues that are not in compliance with the FOA and authorizing legislation. The Program Office leads and conducts any compliance process, but in some instances may also involve FPOs and other Regional staff in reviews. This review typically focuses on programmatic items, allowable costs, and other items identified as requirements in the FOA, such as: targeted populations, allowable activities, funding restrictions, other cost concerns, performance outcomes, etc.

Issues identified in the compliance review process become Conditions of Award and are included in the grantee's 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. Typically, grantees have between 30 to 45 days, depending on the condition(s), from the receipt of their grant award package (or receipt of the compliance review letter, if compliance reviews were completed after grant packages were mailed to grantees) to submit responses to compliance item requests for further clarification and/or revisions for modification to their FPO and the Program Office.

FPOs review grantee responses to compliance items and submit their recommendation or nonrecommendation to the Program Office for final review and concurrence. This aligns with the standard modification process for Program Office concurrence on modifications or further clarification requests related to SOW modification requests.

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;
 - o Development of Individualized Service Strategy or Individualized Employment Plan;
 - o Education and training (classroom and non-classroom related);

- o 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

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, <u>Reporting</u>. Your FPO is also available on an ongoing basis to help you determine an appropriate format for reporting your grant's progress.

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 PMS.

Note: 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.)

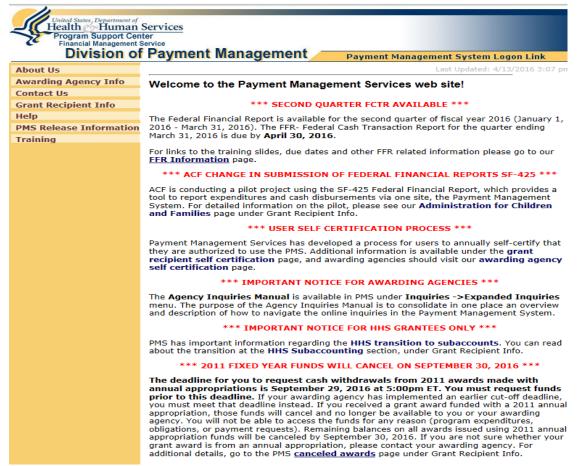


Figure 3: Payment Management System Opening Webpage

Reporting

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 the appropriate OMB-approved Form ETA-9130 to prepare financial reports, unless otherwise instructed. Including the basic ETA-9130 form, there are 14 different program specific ETA-9130 reports. A majority of competitive award grants will use the basic form, however, grantees should ensure they are using the correct form when completing a quarterly financial report. A copy of Form ETA-9130 and related instructions are available at https://wdr.doleta.gov/directives/attach/TEGL/TEGL_2-16.pdf. Additional links to the Financial Reporting System portal are available at https://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 also 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 <u>ETApassword.pin@dol.gov</u>, you will receive confirmation of your password and PIN in separate messages. These two items should be kept separately. Using the password, one individual will be responsible with entering the data on the ETA-9130 report and a separate individual, with the PIN, will be responsible for ensuring the accuracy of the financial data entered and certifying the report. It is expected that the person reviewing the data is an authorized official in the grant organization.

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: <u>http://www.doleta.gov/grants/resources.cfm</u> and under the Financial Management section of <u>https://www.workforcegps.org/online-training</u>.

Note: You have 90 calendar days <u>after</u> the last day of the period of performance to liquidate funds from PMS for allowable grant costs incurred on or before the last day of the period of performance. These costs must be accrued for and reported on the final ETA-9130 report. 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

Username Password	
Forgot your password?	SIGN IN
	D 2003 2013 Junior Parameter
	© 2003-2017 Appian Corporatio

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 at www.workforcegps.org/communities 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 32 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 data fields such as:
 - Total grant participants served;
 - o 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 and your Grant Agreement for your specific grant program reporting requirements.

DOL/ETA is currently transitioning to reporting on the WIOA performance indicators. Some grant programs may still be using the Enterprise Business Support System (EBSS) legacy reporting systems through the end of their grant program or until full implementation of the new WIOA indicators is complete. The Workforce Information Performance System (WIPS) is now online and it is expected that, eventually, all discretionary programs will be reporting either directly into WIPS or

into a web-based WIOA case management system through which reports will be uploaded into WIPS for viewing. This handbook will be updated on a bi-annual basis and system reporting requirements for individual grant programs will be revised during the bi-annual update as new information is available.

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 – *Performance Reporting Timeframes and Submission Deadlines*. **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, related results, 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: 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 grant recipients 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). For ETA's purposes, a monitoring review is a process used to measure progress, identify areas of compliance, offer opportunities for technical assistance to help resolve non-compliance issues, and ensure that Federal funds are used responsibly. The ETA Core Monitoring Guide is the standard tool that should be used by the FPOs when conducting on-site monitoring reviews.

Measure Progress

 The FPO makes judgments based on the information collected during pre-monitoring and while on site and assesses the grant recipient's progress in meeting performance goals/measures, and participant outcomes while ensuring fiscal integrity and transparency. Thus, the FPO can see how much progress the grant recipient has made toward achieving its goals.

Provide Technical Assistance

The monitoring process provides an opportunity for ETA, contractors, 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.

Identify Areas of Compliance

- The FPO assesses the grant recipient's compliance with applicable laws, regulations and other requirements by using the indicators from the Core Activities during the on-site monitoring visit. The FPO will examine the sufficiency of the grant recipient's financial and administrative systems in tracking, accounting, and reporting grant revenues, assets, expenditures, and liabilities of the program/grant.
- Steps to ensure timely and adequate corrective action are also tracked.

Whether the grant recipient is new to ETA-funded programs or is a long-time recipient of ETA grant funds, the FPO needs to take several steps to prepare and plan for on-site reviews. There are instances where grant recipients fail to realize that their common practices are not always in compliance with laws and regulations. These are blind spots that can become visible with effective monitoring. Being proactive with monitoring goes beyond only looking at compliance issues, and it extends to identifying ways to improve the service design and delivery as well as to the effectiveness and efficiency of the operations conducted by the grant recipient.

The on-site monitoring process is conducted and documented using the ETA Core Monitoring Guide, which is the primary tool FPOs use to review any ETA-funded grant activity. The guide is organized around three core activities: 1) Service Design and Delivery; 2) Grant Operations; and, 3) Financial Management.

Each Core Activity is organized around specific subject areas called objectives. These objectives address a specific requirement or topic contained in statutes, regulations, FOAs, Grant Terms and Conditions, and the Uniform Guidance. Indicators accompany each objective. The indicators and the corresponding questions are the criteria that are used to determine that the objective or requirement is being met.

The indicators are labeled (C) for compliance that must be met or (E) for effectiveness that may result in an area of concern or a finding at a later time, if not addressed. If a compliance indicator is not met, it results in a finding.

A finding is a violation (condition) of a specific compliance requirement contained in law, regulations, national policies, FOAs, Uniform Guidance or OMB Circulars, the Grant Terms and Conditions, ETA policy guidance, including TEGLs, and/or the grant agreement that requires specific corrective action. Each finding should contain a topic sentence that describes the condition (the compliance violation), the cause of the violation, the citation supporting the condition as a compliance issue, and the requirements for appropriate corrective action by the grant recipient, including timeframes for completion. This is known as the 4 Cs: Condition, Cause, Criteria, and Corrective Action, which is discussed in detail later in this section.

Areas of concern or observations: If an effectiveness indicator is not met and the FPO/Reviewer believes that it may possibly result in a finding at some later point if not addressed, an area of concern or observation is identified. Areas of concern or observations are not specific compliance violations, but may have negatively impacted the program or could lead to a finding in the future. Traditionally, no corrective action is specified or required for areas of concern or observations but may instead include suggestions for improvement.

In most cases, ETA will notify you of a monitoring review anytime between 30 to 60 days prior to the intended start date of the review. 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;
- Subawards with subrecipients;
- Financial documents;
- Products developed;
- Project implementation tools;
- Allocation of expenditures;
- Policies, procedures, and practices related to performance and financial management; and
- Additional information based on specific grant type.

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

- Off-track to meet performance and/or expenditure expectations;
- 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:

 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;
- Grievance a source or entity files a grievance or complaint against the grantee/program that challenges the integrity of the grant's management; or
- Other issues/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. The exact number of days may vary depending on the size and scope of your grant.

Post-Monitoring Procedures

After the monitoring process is complete, 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. A grantee's first step to addressing TA needs should be to contact their FPO, identify the 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 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. This event may be held as a live or virtual meeting.
- **FPO Technical Assistance (in-person, email, telephonic, or virtual**): On-going TA discussions with the FPO regarding grant implementation, deliverables and performance outcomes may include, but not limited to, guidance regarding compliance requirements,

successful strategies, suggestions of on-line resources, facilitation of Peer to Peer TA and/or TA referral(s) as needed.

- 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 FPOs.
- 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 type, 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 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)
 *See SOW modifications requiring concurrence table below for more details
- 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

Before submitting a modification request,

Checklist for Modification Requests

- ✓ Call your FPO to discuss your request
- Prepare cover letter on the organization's letterhead
- ✓ Address the letter to your Grant Officer
- Include a written description and justification for each proposed change
- Attach other documents as directed by your FPO
- ✓ If requested, e-mail a draft of the letter to your FPO for feedback
- Submit the final request with the cover 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
- ✓ Additional information as requested by your FPO

contact your FPO to discuss the details. Your FPO will provide input on how to submit a modification based on your specific circumstances and advise you on what to include. **Note:** The modification process included in this Handbook is the

advise you on what to include. **Note:** The modification process included in this Handbook is the general process, and could vary slightly based on your circumstance. Grantees must always talk to their assigned FPO prior to submitting a modification request.

Specifically, follow your FPO's guidance to compile a formal modification request. The request must include a cover letter on your letterhead addressed to your Grant Officer and signed by the

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.

Authorized Representative. The letter must include the requested modification type(s), grant name, and grant number, while the body of the letter and any supporting documentation should reflect the justification of the requested modification(s). Depending on the circumstances, your FPO may ask you to provide an unsigned draft of your modification so that s/he may review prior to the formal submission. **Note:** A verbal discussion and/or commitment from your FPO or Grant Officer may not be substituted for a formal written modification request. Further, the non-Federal entity should review the requirements listed at 2 CFR 200.308(c) prior to submitting a request.

Step-by-Step Guide to Submit a Modification Request

- 1. Call your FPO to discuss the need for a modification and to verify the documentation/format needed to submit it.
- 2. If requested, 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 and provides feedback, if needed.
- 4. If indicated by your FPO, revise your request letter/package and submit the signed modification request¹.
- 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. Once the copy of the modification has been received, you are free to implement your requested changes.

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.

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. 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.
- 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.

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.

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> <u>audit</u>. To identify what is counted as expended see 2 CFR 200.502 – Basis for determining Federal Awards Expended.

- 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. and 2 CFR 2900.2.
- 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.
- The term non-Federal entity and the application of Subpart F of the Uniform Guidance extends to not only States, local governments, Indian tribes, institutions of higher education, and non-profit organizations, but also for-profit entities, foreign public entity, and foreign organizations (2 CFR 2900.2) These audits are conducted by an independent, non-Federal auditor (a licensed CPA), and the results of the audit are

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

submitted to a Federal Audit Clearinghouse so that any Federal agencies can access them with the exception of for-profit organizations. These single audits should be remitted straight to ETA's National Office.

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).

Result of Oversight and Monitoring

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. The resolution will follow the 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.
- 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 National office Audit Team 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. Below is a summary of the steps involved during the resolution process:

- 1. OIG pulls the Final Audit Report (FAR) from the Federal Clearinghouse.
- 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)**.

- 3. Regional Office receives and reviews documents and provides recommendations to OGM for review. **Note**: The Regional Office is the first line of contact to receive and review supporting documentation from the grant recipient.
- 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.
- 6. OGM The 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.
- 8. The **FD** issued by the Grant Officer summarizes which findings are corrected or uncorrected, as well as any allowed, disallowed, and/or questioned costs.

<u>Time Limit</u>

The requirements for audit resolution must be met within 180 days from the date the single audit report is accepted by the Federal Clearinghouse. See 2 CFR 200.503(c).

After the Final Determination

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

<u>Appeals</u>

- Depending on the grant program, the grantee may have rights to appeal.
- If so, the 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<u>https://www.gpo.gov/fdsys/pkg/CFR-2014-title2-vol1/pdf/CFR-2014-title2-vol1-part200-subpartF.pdf</u>

SECTION 7

CLOSEOUT PHASE

The grant moves into the closeout phase once it reaches the period of performance end date. A Grant Closeout Specialist, from ETA's National Grant Closeout Unit, will be assigned as your organization's primary point of contact during the closeout phase. The Closeout Specialist reviews your organization's grant status to ensure that all of the required work under the grant is complete and that all outstanding financial and administrative obligations are met. Grant recipients are allowed to liquidate accrued expenditures for allowable charges incurred during the grant period of performance – not NEW obligations in accordance with 2 CFR 2900.15.

It is important to remember that an organization **may not** incur any additional obligations during the closeout period (i.e. after the period of performance has expired). The official closing of the grant occurs after ETA's Closeout Grant Officer determines and certifies that all required grant obligations and responsibilities are complete.

Step-By-Step Guide to the Closeout Process

The grant closeout process is initiated once the Closeout Specialist sends electronic copies of the closeout notification and the grant closeout system enduser manual to your organization's Authorized Representative and/or to any other contacts provided for quarterly financial reporting purposes. The closeout notification message is sent, within seven days before the end of the grant period of performance. The Please note that the closeout financial report (Closeout ETA-9130) is <u>a separate document</u> from the final financial report ETA-9130.

The final financial report ETA-9130 is **due within 45 calendar 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 calendar days** of the expiration date of your grant.

notification contains the name, telephone number, and e-mail address of the assigned Closeout Specialist. The Grant Closeout Specialist is your primary point of contact during the closeout process. The FPO assigned to your grant will be copied on most notifications and provide support, if needed. 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. It is the grant recipient's responsibility to ensure that your FPO has the accurate email address for your organization's Authorized Representative at the time of closeout for notification purposes.

All forms posted in the Grant Closeout System must be completed and submitted via the on-line system within 90 days of the expiration the grant. The forms to be completed include:

- 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 Grant Closeout System Package: To certify your organization's closeout package, the Authorized Representative will need to access the Grant Closeout System using the following URL: <u>https://doleta.gov/grants/grant_closeout.cfm.</u> He/she 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.

The entity classification type will determine which Grant Closeout System package your organization must complete and submit via the on-line system. The two different types of packages and the forms included are as follows:

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

In addition to the Grant Closeout System forms that your organization is required to submit, all other closeout documents deemed necessary for closure must be submitted to your assigned Grant Closeout Specialist. Other required closeout documents may include any 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.

Once you have submitted the entire grant closeout package, your Grant Closeout Specialist will conduct a financial analysis to determine whether 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 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 – How To Manage Your Period of Performance, you have 90 calendar days <u>after</u> the last day of the period of performance to liquidate allowable charges made to the grant for costs incurred <u>on or before</u> the last day of the period of performance. However, <u>no costs incurred</u> <u>after the last day</u> of the period or performance may be charged to the grant. This includes costs to closeout the grant. For additional information on closeout requirements, please visit <u>2 CFR 200.343</u>.

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 specific period of time. This is three years, either 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>.

Return of Funds

DOL/ETA no longer accepts paper checks for many types of incoming funds. ETA has completed an initiative with the U.S. Department of the Treasury to accept electronic payments in lieu of paper checks. Incoming payments including returns and recoveries to DOL will now be made via Pay.gov. Electronic payments through Pay.gov are deducted directly from the respective bank account on the payment date. It is reliable, safe and convenient. It provides mutual benefits to the customer and ETA such as timely and convenient payments, reduced process requirements, and mitigating lost or stolen checks in the mail. The web address for making electronic payments is https://www.pay.gov/public/form/start/177233981. Grantees returning funds to their respective grants shall use the PMS(PMS) to submit payments. This process is the same as a drawdown within PMS. If you have any questions, please contact ETA's Office of Financial Administration via email at ETA-ARTeam@dol.gov.

APPENDIX A

GENERAL PARAMETERS GOVERNING THE USE OF ETA GRANT FUNDS

ETA grantees are responsible for adhering to a number of 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 allowable 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. Listed below are links to helpful resources to help you better understand the requirements for operating a Federally funded grant.

- Uniform Guidance including technical corrections (01/2017) <u>2 CFR Part 200</u>
- DOL's Exceptions to the Uniform Guidance 2 CFR Part 2900 <u>2 CFR Part 2900</u>
- Resources for Understanding the Uniform Guidance <u>https://cfo.gov/grants/uniform-guidance/</u>
- DOL-ETA Grant Management Training Modules -<u>https://grantsapplicationandmanagement.workforcegps.org/</u>
- US DOL-ETA grants webpage and resources <u>http://www.doleta.gov/grants/resources.cfm</u>

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, foreign public entities, and foreign organizations must 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, subrecipients, and/or subgrants 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>Statute</u>)
- 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: <u>http://www.doleta.gov/reports/dpld_regulatory.cfm.</u>

To determine which program regulations are applicable, you should refer to the grant's terms and conditions, as described in the Grant Award Package. Please direct questions 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/. You may also register here: https://public.govdelivery.com/accounts/USDOL/subscriber/new?pop=t to receive automatic updates via email specific to your grants and interests.

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 guidance 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) you will find most of the pertinent information about complaint and appeals procedures in <u>WIOA Section 181(c)</u> and the WIOA regulations at <u>20 CFR 683.600</u>. 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: <u>http://www.dol.gov/oasam/programs/crc/</u>. Specifics about the process for pursuing discrimination-related complaints are located in <u>WIOA Section 188</u> and/or <u>29 CFR part 38</u>.

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-2A² 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 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/events/2016/03/22/09/38/Job_Service_Complaint_System_Resolving_Complaints or on the WorkforceGPS Agricultural Connections Resource Page at https://farmworker.workforcegps.org/.

² 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.

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 (<u>www.servicelocator.org</u>) 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 (<u>www.CareerOneStop.org</u>) 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 (<u>www.careeronestop.org/competencymodel/</u>) 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 (<u>www.MyNextMove.org</u>) 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 (<u>www.MyNextMove.org/VETS</u>) 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 (<u>www.mySkillsmyFuture.org</u>) 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.

Apprenticeship (<u>www.dol.gov/featured/apprenticeship</u>) 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 (<u>www.CareerOneStop.org/Vets</u>) 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 (<u>www.vcn.org</u>) 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 (<u>www.CareerOneStop.org/Reemployment</u>) 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 (<u>www.WorkforceGPS.org</u>) 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 (<u>www.miproximopaso.org</u>) 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 (<u>www.careeronestop.org/JobCenterSearch</u>) allows users to quickly locate and contact their nearest American Job Center.
- 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 (<u>www.careeronestop.org/VeteransJobSearch</u>) 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.
- 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** (<u>www.careeronestop.org/TrainingFinder</u>) 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 Toolkits
 - Resources to introduce you to apprenticeship along with its benefits for employers, workers, and the workforce system.
 - o www.dol.gov/apprenticeship/toolkit.htm
 - o <u>www.doleta.gov/oa/employers/apprenticeship_toolkit.pdf</u>
- Career Pathways Toolkits
 - Features key elements to help guide state and local teams develop a comprehensive career pathways system.
 - o 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.
 - <u>www.businessengagement.workforcegps.org/resources/2016/04/12/13/53/S</u> ector-Strategies-Implementation-Framework
- Competency Model Clearinghouse
 - To assist users with the development of competency models and career ladder/lattices.
 - o <u>www.careeronestop.org/competencymodel</u>
- Grants Management and Uniform Guidance Training
 - Contains more than 25 online training modules from ETA.
 - o https://grantsapplicationandmanagement.workforcegps.org/
- 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
 - www.getmyfuture.org

Agency Contact Center Hours

Agency	Toll-Free Number	
Contact Center Number	1-866-4-USA-DOL (1-866-487-2365)	
(General DOL Inquiries)	Hours: Monday to Friday, 8 a.m. to 8 p.m. ET	
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	
Job Corps (JC)	1-800-733-JOBS (1-800-733-5627)	
,	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	Hours: 24 hours a day, 7 days a week	
(OSHA)		
Office of Disability	1-866-ODEP-DOL (1-866-633-7365)	
Employment Policy (ODEP) Office of Small and	Hours: Monday to Friday, 8 a.m. to 11 p.m. ET	
Disadvantaged Business	1-888-9-SBREFA (1-888-972-7332)	
Utilization	Hours: Monday to Friday, 8 a.m. to 8 p.m. ET	
(OSDBU)	Hours. Monday to Finday, 6 a.m. to 6 p.m. ET	
Veterans' Employment &		
Training Services (VETS)	1-866-237-0275	
Service Desk	Hours: Monday to Friday, 8 a.m. to 8 p.m. ET	
Women's Pursey (M/D)	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		
	4 000 000 0000	
Civil Rights Center (CRC)	1-202-693-6500	
C ()	Hours: Monday to Friday, 8:00 a.m. to 5:00 p.m. ET	
Employee Benefits Security Administration (EBSA)	1-866-444-3272 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'		
Compensation Programs	1-202-693-0040	
(OWCP)	Hours: Monday to Friday, 8:30 a.m. to 4:45 p.m. EST	
	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	
Wage and Hour Division	1-866-4-US-WAGE (1-866-487-9243)	
(WHD)	Hours: Monday to Friday, 8 a.m. to 8 p.m. EST	

Grant Program Mailboxes

ETA established convenient electronic mailboxes for each competitivelyawarded 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): <u>cpy@dol.gov</u>
- H-1B American Apprenticeship Initiative (AAI): <u>apprenticeship.grants-eta@dol.gov</u>
- H-1B America's Promise: <u>americaspromise@dol.gov</u>
- H-1B Make It In America (MIIA): <u>jobsaccelerator@dol.gov</u>
- H-1B Ready To Work: <u>RTW@dol.gov</u>
- H-1B TechHire: <u>techhire@dol.gov</u>
- 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: <u>NFJP@dol.gov</u>
- Reentry Employment Opportunities: <u>reo.eta@dol.gov</u>
- SCSEP: TBD
- State Expansion/State Accelerator Apprenticeship Grants: apprenticeship.grants-eta@dol.gov
- TAACCCT: <u>taaccct@dol.gov</u>
- Workforce Innovation Fund: workforce.innovation@dol.gov
- YouthBuild: youth.build@dol.gov
- Youth Career Connect: <u>vcc@dol.gov</u>

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
CAP	
CoP	
CPY	Career Pathways of Youth
DOL	Department of Labor
DUNS	Data Universal Numbering System
EBSS	Enterprise Business Support System
EDMR	0
EIN	Employer Identification Number
ETA	Employment and Training Administration
FAIN	Federal Award Identification Number
FAR	Federal Audit Report
FD	Final Determination
FOA FPO	Funding Opportunity Announcement
GAO	Federal Project Officer General Accounting Office
ID	Initial Determination
INAP	Indian Native American Programs
JC	Job Corps
LMI	•
MIIA	
NAICS	
NFJP	National Farmworker Jobs Program
NICRA	Negotiated Indirect Cost Rate Agreement
NO	National Office
NOA	Notice of Award
OGM	Office of Grants Management
OIG	Office of Inspector General
ORM	Office of Regional Management
OMB	Office of Management & Budget
OSHA	Occupational Safety and Health Administration
PII	Personally Identifiable Information
PMS	
REO	Re-entry Employment Opportunities
RO	Regional Office
RTW	
SAE	
SCSEP	, , , , , , , , , , , , , , , , , , , ,
SF	
SOW SWFI	
SWFI TA	
	Trade Adjustment Assistance Community College and Career Trainin

 TAACCCT
 Trade Adjustment Assistance Community College and Career Training

- **TEGL** | Training & Employment Guidance Letter
 - TEN Training & Employment Notice
 - UG Uniform Guidance
- **UIPL** Unemployment Insurance Program Letters
- **VETS** Veterans Employment and Training Services
- WHD Wage and Hour Division
- WIF Workforce Innovation Fund
- **WIPS** Workforce Information Performance System
- **WIOA** Workforce Innovation and Opportunity Act
 - YB YouthBuild
 - **YCC** Youth Career Connect