

The Stevens Amendment

Questions and Answers for HVRP and Stand Down Recipients

Q1. What is the Stevens Amendment?

Since 1989, the United States Department of Labor's (DOL) annual appropriation has included a provision known as the Stevens Amendment. Its purpose is to ensure transparency and accountability in federal spending. This provision requires the recipients of DOL grants and cooperative agreements to acknowledge federal funding when publicly discussing any projects or programs that DOL funded through its annual appropriation. For fiscal year 2023, this provision appeared in section 505 of division H of Public Law [117-328](#).

Q2. What does the Stevens Amendment require?

The text of the amendment says:

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

When enforcing this requirement, Veterans' Employment and Training Service (VETS) will make the following interpretations and assumptions:

- The disclosures required by the Stevens Amendment apply to all public materials describing projects or programs funded through the DOL annual appropriation, not just printed materials.
- "Non-governmental sources" means any funding source other than the Federal Government. In this document, we use the term "non-federal funds" or "non-federal sources" for clarity.
- The Stevens Amendment does not require a disclosure of the cost of creating or issuing the particular statement, website, or other documents subject to the disclosure. It only requires disclosure of the total funding for the relevant project or program (e.g., the Homeless Veterans' Reintegration Program (HVRP)) that is described.

Q3. What kinds of documents or locations commonly lack the required Stevens Amendment disclosure?

Based on an informal review of publicly available information, some examples of documents and statements that commonly lack the Stevens Amendment disclosure statement, due to being overlooked, include:

- Grant Recipient websites
- Grant Recipient outreach materials (posters, flyers, brochures, resource guides, etc.) advertising services available at their organization
- Marketing materials advertising organization's HVRP services, programs, and Stand Down events.
- Press releases and other public statements
- Social media posts referencing HVRP programs, Stand Down events, services, grants, etc.

Q4. What form should the Stevens Amendment disclosure statement take?

The general structure can take this form:

The [project/program] is supported by the [federal agency]. A total of \$[amount], or [percentage] percent of [project/program] [is/will be] financed with federal funds, and \$[amount], or [percentage] percent [is/will be] funded by other sources.

For example:

[Organization Name]'s Homeless Veterans' Reintegration Program is supported by the U.S. Department of Labor. A total of \$250,000, or 50 percent, of the program is financed with federal funds, and \$250,000, or 50 percent, is funded by other sources.

Alternatively, if the program or project is solely financed by the Federal Government:

[Organization Name]'s Stand Down event is 100 percent funded by the U.S. Department of Labor through awards totaling \$7,000.

If a project or program has multiple funding sources, each award does not need to be listed separately. For example, documents or websites generally describe programs for veterans that JVSG, HVRP (through DOL-VETS), the Department of Veterans' Affairs, and the Wagner-Peyser Employment Service (through DOL-Employment and Training Administration (ETA)) fund.

For example:

[Organization name]'s Stand Down is federally funded with \$10,000 (50 percent). Additionally, 50 percent (\$10,000) is financed by non-federal sources.

Q5. Can you provide examples of disclosure statements that would not fully meet the requirements?

The following examples do not meet the Stevens Amendment disclosure statement requirement:

- *“Disclosure of Federal Participation — Projects or programs funded in whole or in part with Federal grant money must credit the federal government for the federal government's portion of the financial support. This web page citation informs the public that the use of Federal dollars in meeting the Stevens Amendment requirement. Staff development opportunities, resource purchases, equipment and personnel have been funded in whole or in part with Federal entitlement dollars.”*
 - This statement does not contain the federal funding entity, the amount and percentage of funds from the federal source, or the funding and percentage that any non-federal entities provided.
- *“XXX is funded through the Governor’s Emergency Education Relief fund as part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act and the Workforce Innovation and Opportunity Act (WIOA) funding.”*
 - This statement does not contain the federal funding, amount, percentage of funds from federal source(s), or funding and percentage amounts (if any) that non-federal entities provided.
- *“Proposed Sub award Amount: The One-Stop Operator will be funded as a WIOA Title I sub award. For planning purposes, bidders should estimate WIOA funding of up to \$150,000 for this RFP.”*
 - This statement does not contain the federally provided percentage of funds, the total dollar amount of federal funds supporting the project or program, or the funding and percentage amounts (if any) non-federal entities provided.

Q6. What if a solicitation spans multiple years?

The Stevens Amendment does not specify whether grant recipients should disclose their annual award amount or cumulative award amount. We recommend using the annual award amount, i.e., the amount of federal funding the grant recipients received for the budget period and not the longer project period.

Q7. Is the Stevens Amendment language required in financial or non-financial contracts?

Contracts do not require the Stevens Amendment disclosure statement. The disclosure is necessary only when issuing statements, press releases, RFPs, bid solicitations, and other publicly available documents describing projects or programs funded in whole or in part with federal money. Grant recipients receiving federal funds, including those from state and local governments, must clearly state the following in the funding disclosure notice:

- The total dollar amount of federal funds supporting the specific project or program;
- The percentage of total costs that federal funds financed; and
- The percentage and dollar amount of the total costs non-federal sources (if any) financed.

Q8. Which amount should be included in the disclosure statement?

Grant recipients must provide the total amount of federal funds that support the project or program and the percentage of total costs federal funds financed. Because the Stevens Amendment does not specify whether to use the current year's annual amount allotted, the amount received during the current year (i.e., incremental funding), or the cumulative amount (i.e., the total amount for all combined awards within the period of performance), recipients may choose. VETS recommends using the current fiscal year's annual award amount received for the budget period. Whichever method is used, the recipient should consistently use that method for all Stevens Amendment disclosures across all programs.

Q9. What types of press releases are subject to the Stevens Amendment?

Press releases describing projects or programs funded in whole or in part with federal money must include the disclosure statement. Also, if those communications describe a project or program that federal funds subject to the Stevens Amendment financed in whole or in part, then the press release must include the required funding disclosures.

Q10. Does the disclosure statement need to be on organizational websites?

Organizational websites describing projects or programs that federal funds subject to the Stevens Amendment funded in whole or in part must contain the disclosure statement.

Q11. Is the Stevens Amendment disclosure required on every page of the document or website?

No, the Stevens Amendment disclosure is not required on every page of the document or website, but at least one page must contain the disclosure statement.

Q12. Within any communication, what language is considered "describing projects or programs"?

Any communication made in furtherance of accomplishing the goals of a federal project or program for which the grant recipient has an award is a description of projects or programs.

Q13. Which communications are included in "other documents"?

In the Stevens Amendment, "other documents" is any communication including but not limited to public statements, social media posts, toolkits, resource guides, websites, and visual presentations. For example, an emailed newsletter intended for the public that describes a

federally funded program requires the disclosure statement. The following list includes some examples of documents or other publications that may describe a project or program that federal money funds in whole or in part:

- Bids for solicitations
- Blogs/vlogs
- Brochures
- Email blasts
- Manuals
- Press releases
- Promotional materials (e.g., fliers, advertisements)
- Requests for proposals (e.g., supplemental and continuation proposals)
- Resource guides
- Documents that include statements about the program or project
- Toolkits
- Visual presentations (e.g., PowerPoint presentations)
- Websites

Q14. Would a tagline like this suffice as a disclosure statement? “Grant Recipient xxxxx is fully funded by federal funds through direct awards and sub-awards.”

No. The Stevens Amendment requires both a dollar amount and the percentage (as applicable) of federal funds provided for the project or program.

Q15. We use social media posts to announce services, training programs, etc. Is a disclosure statement required for social media posts? If so, does it need to be in the body of the item or can it be in a tagline?

Yes, a disclosure statement is required for social media posts. The statement does not need to be in a specific part of the communication; it only needs to clearly state the required information.

Q16. Some social media platforms, like Twitter, have a limited number of characters. How can we include the disclosure statement in this circumstance?

When it is not practical to put the disclosure statement within the electronic communication, a hyperlink to the statement is sufficient.

Q17. Can the statement include a link on digital or printed material in place of a dollar amount while including the rest of the required information?

If the material is digital, a hyperlink is fine. Because it is not possible to hyperlink on a printed document, unless using a QR code, including one would not be sufficient to meet the notification requirement.

Q18. On a bid solicitation, the cost is not known in advance. What amount should we then include in the disclosure statement?

The amount in the disclosure statement is not the amount for the specific item that is the subject of the communication (such as a bid solicitation, in this example). Use the amount and percentage, as applicable, for the entire project or program.

Q19. Is a disclosure statement required on communications related to indirect funding, such as an RFP

for payroll processing?

No. A disclosure statement is only required for activities that further the goals of a federal project or program. Although federal awards ultimately fund them through the application of an indirect cost rate, indirect activities do not directly further the goals of a federal project or program.

Q20. Should monitoring for compliance include programmatic reports, fiscal reports, or both?

Both.

Q21. What must grant recipients of federal funds do to ensure compliance with the Stevens Amendment?

Grant recipients are encouraged to create a compliance monitoring plan that includes:

- Providing copies of the programmatic and fiscal monitoring reports to the grants compliance specialist to ensure compliance with the Stevens Amendment.
- Requiring Stevens Amendment provisions be listed in all policies, processes, and monitoring procedures.
- Updating grantee financial monitoring tools to ensure this requirement is met.

Q22. What are the penalties for noncompliance?

Although no sanctions are specified for noncompliance, failure to comply could be considered a breach of responsibilities and may result in a corrective action plan; conditions placed on the award; or termination, suspension, or debarment of funds awarded.

Q23. We have existing brochures and other printed material documents describing projects or programs funded in whole or in part with federal money that do not include the required statement. Do we need to throw them away?

No. Grant recipients do not have to throw away materials that do not include a Stevens Amendment disclosure, but you must update documents in future printings to meet the Stevens Amendment requirements; the intention is to come into compliance, not to waste existing resources.

Q24. Where can I go to learn more?

- [Public Law 117-328, Division H, Title V, Section 505](#)
- Your applicable Funding Opportunity Announcement's section on intellectual property rights