Job Corps Scholars FPO Information Session

An internal training session for Job Corps Scholars grantees by the FPO.

January 19, 2022

Town Hall Overview

Purpose

To confirm understanding compliance of the terms and conditions of the grant award.

Agenda

1. **Review the Terms and Conditions of the Grant Award**
2. **Reiterate the Necessity for Accurate Reporting**
3. **Explain the Allowed Budget Flexibilities**

Discussion

Plan is to have FPO Town Halls, as needed, that focuses on specific compliance topics.

Resources

➢ **Job Corps Scholars Program Policy Website**

➢ **WorkforceGPS Job Corps Career Pathways – Community of Practice**
  ➢ Funding Opportunity Announcement
  ➢ Eligibility Guide
  ➢ Questions and Answers
  ➢ Policy Guidance

➢ **Terms and Conditions**
  ➢ Grant Agreement

➢ **Uniform Guidance 2 CFR Part 200 and 2 CFR Part 2900**

➢ **Core Monitoring Guide**

Terms and Conditions of the Grant Award

Terms and Conditions of the Grant Award

- 1. Order of Precedence
- 2. Notice of Award
- **3. Funding Opportunity Announcement**
- 4. Federal Project Officer
- 5. Indirect Cost Rate and Cost Allocation Plan

- 6. Approved Statement of Work
- **7. Approved Budget**
- 8. Return of Funds
- 9. Evaluation, Data, and Implementation
- 10. Resources and Information

Reference Grant Agreement

Terms and Conditions of the Grant Award

▶ 11. Cost Limitation Restrictions

- ‣ **a. Budget Flexibility**
- ‣ b. Consultants
- ‣ C. Non-Federal Share (Match or Cost Share)
- ‣ d. Travel
- ‣ e. Travel – Foreign
- ‣ f. Travel – Mileage Reimbursement Rates
- ‣ g. WIOA Infrastructure

Reference Grant Agreement

Terms and Conditions of the Grant Award

‣ 12. Administrative Requirements

 ‣ a. Audits

 ‣ b. Changes in Micro-purchase and Simplified Acquisition Thresholds

 ‣ **c. Closeout/Final Year Requirements**

 ‣ **d. Creative Commons Attributions License**

 ‣ e. Equipment

 ‣ **f. Federal Funding Accountability and Transparency Act (FFATA)**

 ‣ **g. Intellectual Property Rights**

 ‣ h. Intellectual Property Rights and the Bayh-Dole Act

 ‣ **i. Personally Identifiable Information**

 ‣ j. Pre-Award

‣ **k. Procurement**

‣ l. Program Income

‣ m. Publicity

‣ n. Recipient Integrity and Performance Matters

‣ **o. Reports**

‣ p. Requirements for Conference and Conference Space

‣ q. Subawards

‣ **r. Supportive Services & Participant Support Costs**

‣ s. System for Award Management

‣ t. SAM Registration Validation

‣ u. Vendor/Contractor

‣ v. Whistleblower Protection

Reference Grant Agreement

Terms and Conditions of the Grant Award

▸ **13. Program Requirements**

▸ 14. 2019 Federal Appropriations Requirements

　▸ a. Fair Labor Standards Act Amendment for Major Disasters

　▸ b. Health Benefits Coverage for Contraceptives

　▸ c. Privacy Act

　▸ d. Prohibition on Contracting with Corporations with Felony Criminal Convictions

　▸ e. Prohibition on Contracting with Corporations with Unpaid Tax Liabilities

　▸ f. Prohibition on Procuring Goods Obtained Through Child Labor

▸ g. Prohibition on Providing Federal Funds to ACORN

▸ h. Reporting of Waste, Fraud and Abuse

▸ i. Requirement for Blocking Pornography

▸ j. Requirement to Provide Certain Information in Public Communications

▸ k. Restriction on Health Benefits Coverage for Abortions

▸ l. Restriction on Lobbying/Advocacy

▸ m. Restriction on the Promotion of Drug Legalization

▸ n. Restriction on Purchase of Sterile Needles or Syringes

▸ o. Salary and Bonus Limitations

Reference Grant Agreement

Term and Conditions of the Grant Award

▶ 15. Public Policy

  ‣ a. Architectural Barriers

  ‣ b. Drug-Free Workplace

  ‣ c. Executive Orders

  ‣ d. Flood Insurance

  ‣ e. Hotel-Motel Fire Safety

  ‣ f. Prohibition on Trafficking in Persons

  ‣ g. Veterans' Priority Provisions

▶ 16. **Policy and Requirements Handbook**

▶ 17. **Attachments:**

  ‣ Attachment A: SF-424

  ‣ Attachment B: SF-424A

  ‣ Attachment C: Budget Narrative

  ‣ Attachment D: Statement of Work

  ‣ Attachment E: Indirect Cost Rate Agreement

  ‣ Attachment F: PRH Exhibits

Reference Grant Agreement

Budget Overview

Smart 3.0 Training on WorkforceGPS

Budget Management

▸ **Understand budget management.**

Citations – Uniform Guidance and Terms and Conditions of the Grant Award:

2 CFR 200.308: Revision of budget and program plans.

2 CFR 2900.9: Revision of budget and program plans.

2 CFR 2900.1: Budget

7. Approved Budget

11. Cost Limitation Restrictions

      a. Budget Flexibility

12. Administrative Requirements

    r. Supportive Services & Participant Support Costs

Budget Resources

Objective 2.b: Budget: The grant recipient has a financial management system or budget control mechanism in place to monitor spending, determine allowability of costs, compare and reconcile the budget to actual expenditures. The system also has triggers for budget modifications when deemed necessary.

‣ **Citation:** 2 CFR 200.302(b)(5) and 2 CFR 200.308

Core Activity 3 Financial Management addresses the financial management systems and functions used by the grant recipient to administer the grant/project in a manner that promotes transparency and accountability and is in compliance with the requirements outlined in the award.

‣ **Citations:** See the Core Monitoring Guide for all of the citations.

Reference Core Monitoring Guide and Uniform Guidance

Prior Approval

▶ **Understand the application of prior approval requirements and the allowable flexibilities built into grant implementation.**

Citations – Uniform Guidance and Terms and Conditions of the Grant Award:

2 CFR 200.407: Prior Approval

2 CFR 2900.16: Prior written approval (prior approval).

11. Cost Limitation Restrictions

a. Budget Flexibility

Budget Narrative

▶ Links appropriate resources to meet project objectives

▶ SF-424A Cost Categories in line with budget resources requested

▶ Per 2 CFR 2900.1: "In the DOL, approval of the budget as awarded does not constitute prior approval of those items requiring prior approval, including those items the Federal Awarding agency specifies as requiring prior approval."

Budget Flexibilities

a. Budget Flexibility

Federal recipients are not permitted to make transfers that would cause any funds to be used for purposes other than those consistent with this Federal program.

Any **budget changes that impact the Statement of Work and agreed upon outcomes or deliverables** require a request for modification **and prior approval** from the Grant Officer.

As directed in 2 CFR 200.308(e), for programs where the Federal share is over the simplified acquisition threshold (currently $250,000), 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.**

Reference Grant Agreement 11a

Terms and Conditions #11a Budget Flexibilities

Any changes within a specific cost category on the SF424(a) do not require a grant modification unless the change results in a **cumulative** transfer among direct cost categories exceeding 10% of total budget as noted above.

It is recommended that your assigned **FPO review any within line changes to your budget** prior to implementation to ensure they do not require a modification.

For programs where the Federal share is below the simplified acquisition threshold, recipients are not required to obtain the Grant Officer's approval when transferring funds among direct cost categories. This includes transferring direct costs to the indirect cost category contained on the SF424(a).

Reference Grant Agreement 11a

Budget Modifications – Prior Approval Overview

Key Requirements

▶ For grants exceeding the Simplified Acquisition Threshold and the **cumulative** amount of the transfers between line items on the budget exceeds or is **expected** to exceed 10 percent of the total budget as last approved by ETA, the grant recipient is required to go in for a budget modification 2 CFR 200.308(e)

▶ The transfer of funds budgeted for participant support costs to other categories of expense. 2 CFR 200.308(c)(5)

▶ Requests for prior approval budget modifications must be submitted in writing at least 30 days before the effective date of any change

▶ Must submit a revised 424A

▶ Recommended to submit a budget realignment analysis

Components of Budget Analysis

▶ Compare actual results with budget plan categories

- ‣ At least quarterly but for each reporting period
- ‣ Identify significant variances and causes
- ‣ Identify and take appropriate corrective action

▶ Conduct trend analysis over time

- ‣ Compare results from one period to the next
- ‣ Track impact of corrective actions

▶ Combine the analysis of financial and program performance indicators

SMART Checklist

▶ Budget Management and Grant Modifications

❑ Develop or update the process to periodically review planned budget and performance goals against actual costs and actual levels of performance. [2 CFR 200.302(b)(5)]

❑ Develop a crosswalk and align chart of accounts to the budget categories identified on the SF-424A and any other reportable item listed on the ETA-9130 or performance report. [2 CFR 200.302]

❑ Schedule quarterly meetings with program and fiscal staff to analyze actual results against the approved budget to allow time for adjustments.

❑ Develop or modify procedures for prior written approvals from the Grant Officer at least 30 days prior to the executable action, if prior approval is required. [2 CFR 2900.9 to 2900.12]

❑ Train program and fiscal staff on the budget and grant modification process including analysis of financial and performance data. [2 CFR 200.301]

Action

- ➤ **Establish a financial management/budget system that has triggers for budget modifications when deemed necessary.**

- ➤ **Review, understand and apply 2 CFR 200.308: Revision of budget and program plans and all other financial management and budgeting uniform guidance references.**

- ➤ **Confirm that program and fiscal personnel are routinely communicating performance and financial results for effective budget management.**

- ➤ **Establish regular reconciliation with the budget, at least quarterly.**

Accurate Reporting
eCFR :: 2 CFR 200.329 -- Monitoring and reporting program performance.

Resources

▶ [TEGL 23-19 Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs.](#)

▶ [MEASURES OF PERFORMANCE FOR JOB CORPS GRANT PROGRAMS.pdf (dol.gov)](#)

▶ [WorkforceGPS](#): **Job Corps Scholars Performance Reporting Best Practices Guide**

Reporting Definitions – See FOA-ETA-20-3

▶ **Developmental Coursework**: "Grantees may also fund developmental coursework where necessary for student entry into the technical training component." **Must be reported.**

▶ Performance Measures Guide

▶ Defining Exit

▶ Job Attached

Performance Reporting Resources

▶ [Job Corps Scholars Website](#)

▶ [WorkforceGPS Job Corps Career Pathways](#)

▶ [How to Effectively Manage and Organize Your Data Toolkit](#)

▶ [JCGrants.com](#)

Data Collection Tool Accuracy is Critical

Job Corps is authorized by the WIOA

➢WIOA reporting requirements for Job Corps is mandated by the legislation

➢Job Corps submits the data in a format required by DOL/ETA

➢Job Corps grantees must supply the data to allow Job Corps to meet this requirement

➢Job Corps developed online data collection forms to collect the necessary data to calculate all measures

Job Corps Scholars Program Outcome Measures

These Quarterly Performance Reports capture quantitative data on participant demographics, programmatic services, program deliverables, and outcomes

Workforce Innovation and Opportunity Act (WIOA) of 2014 Primary Indicators

➢ Education and Employment Rate – Second Quarter After Exit

➢ Education and Employment Rate – Fourth Quarter After Exit

➢ Median Earnings – Second Quarter After Exit

➢ Credential Attainment

➢ Measurable Skill Gains

➢ Effectiveness in Serving Employers

Job Corps Scholars Program Outcome Measures

1. Separation Rate

2. Dropout Rate

3. Qualifying Placement Rate Upon Separation

4. Qualifying Placement Rate During the 12-month Employment Counseling Period Post-Separation

5. Average Starting Salary/Wage When in a Qualifying Placement - Upon Separation

6. Average Salary/Wage When in a Qualifying Placement 12 months - After Separation

7. Average Earned Academic Credit Hours

8. Enrolled in the Armed Services Upon Separation

9. Enrolled in an Apprenticeship Program Upon Separation

10. Full-time Employment Upon Separation

IMPORTANT:
Regular Reconciliation

Business Items

Immediate Communication Required per 2 CFR 200.329(e)

Do not wait to inform DOL if the following conditions become known:

(1) Problems, delays, or adverse conditions which will materially impair the ability to meet the objective of the Federal award. This disclosure must include a statement of the action taken, or contemplated, and any assistance needed to resolve the situation

★ For example: Any time the main point of contact for your grant changes and/or there are personnel vacancies.

(2) Favorable developments which enable meeting time schedules and objectives sooner or at less cost than anticipated or producing more or different beneficial results than originally planned

Period of Performance Modification Overview

▸ One time no cost extension to the period of performance (POP) end date up to 12 months

▸ Must obtain prior approval to extend POP as early as possible but no later than 30 days from ending date from the Grant Officer

▸ May not be exercised merely for the purpose of using unobligated balances

▸ Must provide supporting reasons and revised POP

   ‣ See § 200.308(e)(2): Revision of budget and program plans.

Future of FPO Open Office Hours/Town Halls

▶ Held on a quarterly basis

▶ Focused on specific compliance topics

In between Town Halls, you can always schedule a meeting with me using the scheduling link in my signature line: *https://calendly.com/angeladayton/job-corps-scholars-discussion*

Primary Point of Contact (POC) is Your FPO

- Angela Dayton, Job Corps Scholars Federal Project Officer (FPO)
  - EMAIL: Dayton.Angela@dol.gov
  - PHONE: 312-596-5491
  - SCHEDULE A MEETING: *https://calendly.com/angeladayton/job-corps-scholars-discussion*

Thank you!