



**EMPLOYMENT AND TRAINING ADMINISTRATION**  
UNITED STATES DEPARTMENT OF LABOR

# Job Corps Scholars Compliance Review

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

April 27, 2022

# Town Hall Overview

## Agenda

1. Expectations for the last year of the period of performance
2. 2 CFR 200.303: Indicator 3.a.1: Effectiveness and Efficiency of Operations
3. 2 CFR 200.329(a): Indicator 2.e.2: Progress Monitoring
4. 2 CFR 200. 329(b): Accurate Performance Reporting
5. 2 CFR 200.302(b)(7): Indicator 3.f.1: Cost Principles
6. Terms and Conditions: Indicator 1.e.6: Eligibility
7. Terms and Conditions: Post-Separation Services (What documentation is required for a participant to opt-out of post-separation services?)
8. 2 CFR 200.456: Stipends as a Participant Support Cost

**Expectations for the last year  
of the period of performance**

**JCS Proposed Timeline**

# Grantees Must

- ▶ Plan, design, implement right now to meet performance outcomes.
- ▶ Meet the enrollment of 80 participants by January 15, 2023, performance reporting period.
  - ▶ Next steps may be administrative remedies of non-compliance.
- ▶ Manage participants timelines in order to achieve your outcomes by September 30, 2023.



# 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](#)

**2 CFR 200.303**

**Indicator 3.a.1: Effectiveness  
and Efficiency of Operations**



# Action Verbs

- a) Establish and maintain...
- b) Comply with...
- c) Evaluate and monitor...
- d) Take prompt action when...
- e) Take reasonable measures to protect PII...



# Application

1. Establish sound grant management practices that are institutionalized and followed consistently across grant programs
2. Have a specific grants management policy and procedures manual that incorporates the evaluation and implementation of the terms and conditions of the Federal award
3. Provide evidence of staff training on the established internal controls



**2 CFR 200.302(b)(7)**

**Indicator 3.f.1: Cost Principles**



# Requirement

- Written procedures for determining the allowability of costs in accordance with subpart E of this part and the terms and conditions of the Federal award.



# Application

1. Review the written procedures for determining allowability of costs per the terms and conditions of the Federal award.
2. Train staff on how to determine the allowability of costs in accordance with subpart E and the terms and conditions of the Federal award.

**2 CFR 200.329(a)**

**Indicator 2.e.2: Progress  
Monitoring**



# Requirements

- Monitoring by the non-Federal entity must cover each:
  - a) program,
  - b) function or
  - c) activity.



# Application

1. Create a performance monitoring tool that covers each program, function, and activity of the Federal award
2. Provide evidence of staff training on the performance monitoring tool.
3. The monitoring tool must contain:
  - a) planned versus actual outcomes,
  - b) a schedule for regular review and analysis of relevant performance data, and
  - c) a process for implementing corrective action plans to achieve performance expectations.

**2 CFR 200. 329(b)**

**Accurate Performance  
Reporting**

# 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



# Application

1. Create a performance reporting tool that tracks each participant's progress through the grant program.
2. The reporting tool must contain the dates for:
  - a) Eligibility determined
  - b) CTT started
  - c) Pre-separation services provided
  - d) Successful completion of CTT (or exit)
  - e) Successful placement and placement type
  - f) All other data elements per the terms and conditions of the grant award

**IMPORTANT:**  
**Conduct Regular Reconciliation**

# **Terms and Conditions**

## **Indicator 1.e.6: Eligibility**

# Eligibility

---

## ▶ Guide to Eligibility

# **Terms and Conditions: Post-Separation Services**

**(What documentation is required for a participant to opt-out of post-separation services?)**



# Post Separation Services Documentation

- ▶ [Funding Opportunity Announcement](#) page 12  
“Post-Separation Services”
- Please refer to the [Definition of Exit](#) for clarification on when termination; stop-out; drop-out is applied to exit.
- For required reporting per the WIOA six indicators and the terms and conditions of the grant award, please refer to the [JCS Performance Reporting Best Practices Guide](#).

# Post Separation Services Clarification

Please reference the email sent on 4/27/22 with additional clarification.

**Grantees must document post-separation services for up to 12 months for all participants that successfully complete the CTT.**

**2 CFR 200.456**

**Stipends as a Participant  
Support Cost**

# Guidance

- ▶ The Program Office received guidance from the Office of the Solicitor that grantees are allowed to use grant funds for stipends. At this time, there is no guidance regarding incentives. (See 2 CFR 200.75 on page 24 of the Funding Opportunity Announcement (FOA)). Generally, stipends may be used as an allowable payment for participation in activities such as occupational skills training or classroom activities, including work readiness or employability skills training. As discussed in the FOA, the grant applicant would have determined, at the time of their application, whether stipends would be covered in the “other” category of their proposed budget. Consult with your FPO as soon as possible to determine whether this is covered based on your budget.

# Stipend Process

- ▶ Determine if you want to provide stipends as a supportive service.
- ▶ Review your institutions internal controls and policy and procedures for offering and providing stipends.
- ▶ Stipends need to be connected to participant engagement activities
  - ▶ As part of your policies and procedures you determine what that means for your program.
  - ▶ You determine how you are going to identify, track, and pay stipends. Records need to be kept.
- ▶ Stipends need to be consistently applied to all JCS participants
  - ▶ This is not a needs-based stipend unless you determine per your policies and procedures you are going to base it on need.

# Next Steps

---

- ▶ Review your budget
- ▶ Update the budget narrative Other cost category to include the breakdown and supporting evidence for the use of stipends
- ▶ Set up a meeting with FPO to review your internal controls and policies and procedures
- ▶ Finalize the budget modification request
- ▶ Wait for approval of the modification request from Grant Officer (Prior Approval is needed)

# 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



**Thank you!**