TRAINING AND EMPLOYMENT NOTICE	NO. 32-10
	DATE March 30, 2011

TO: STATE WORKFORCE AGENCIES
            STATE WORKFORCE ADMINISTRATORS
            STATE AND LOCAL WORKFORCE INVESTMENT BOARD
            CHAIRS and DIRECTORS
            STATE LABOR COMMISSIONERS
            STATE RAPID RESPONSE COORDINATORS

FROM: JANE OATES /s/
            Assistant Secretary

SUBJECT: Revised National Emergency Grant Application Submission and Review Process

1. Purpose. To provide information on revised procedures for the submission and review of National Emergency Grant (NEG) applications. These revised procedures are effective immediately.

2. References.

- Workforce Investment Act (WIA), section 173 (29 U.S.C. 2918)
- WIA regulations at 20 CFR Part 671
- Training and Employment Guidance Letter (TEGL) No. 16-03 and 16-03 Changes 1 - 4, "National Emergency Grant Policy Guidance"
- "Workforce Investment Act: National Emergency Grants - Application Procedures," 69 Fed. Reg. 23052 (April 27, 2004)

3. Background. NEGs are discretionary grants awarded by the Secretary of Labor, under section 173 of the WIA, as amended, to provide employment-related services to dislocated workers. NEGs are intended to temporarily expand service capacity at the state and local levels by providing funding assistance in response to significant dislocation events. Significant events include plant closures and mass layoffs, as well as other events recognized by the Secretary under 20 CFR 671.110(f) that create a sudden need for assistance that cannot be accommodated within the ongoing operations of the WIA Dislocated Worker (DW) formula program.

The Employment and Training Administration (ETA) is responsible for ensuring that the appropriate level of these limited resources is provided for eligible dislocations so that the Department is able to meet as much of the need throughout the country as possible. Complete, relevant and accurate information in each NEG application is therefore critical to perform this function effectively and to accurately assess the purpose, amount, and need for funding. It is important that the quality of information and level of detail are sufficient to enable quick and appropriate funding recommendations.

In order to expedite the processing of NEG applications and be responsive to the workforce system, ETA has undertaken a critical examination of its existing processes and has created methods to facilitate development of NEG applications that can be reviewed and analyzed quickly and awarded with fewer terms and conditions. This should not only result in timelier funding recommendations and decisions, but also a reduction in the number of required modifications.

The process changes and improvements described below are designed to ensure that applicants and reviewers have a common understanding of what constitutes a complete and actionable NEG application. A common understanding should contribute to minimizing the number of incomplete NEG applications submitted, thus decreasing the time it takes to deliver much needed services to dislocated workers under these grants.

4. NEG Application Tools. To ensure consistency and facilitate prompt review and approval of NEG applications, ETA has developed the following tools that support the development of quality NEG applications. All ETA offices involved in reviewing NEG applications in both the National and Regional Offices collaborated on the development of these tools, which can be found at: http://www.doleta.gov/neg/Resources.cfm under "NEG Application Tools."

> **A. NEG Application Checklists** – A NEG Application Checklist was developed for each type of NEG application. These will serve as a common review tool and guidance for ETA's NEG application analysis.
>
> **B. NEG Application Review Guidebooks** – A NEG Guidebook for each type of NEG application was developed to provide additional clarification and explanation around items in the NEG Checklist.
>
> **C. NEG Electronic Application System (eSystem) User Guides and Changes** – Applicants apply for NEGs online directly through the NEG eSystem. The NEG eSystem was recently modified to provide "Checklist" help tags to provide further explanation on what type of information should be entered in specific fields on the application screens, in order to enable NEG applicants to submit a complete NEG application that provides the information discussed in the appropriate *NEG Application Checklist*. To learn more about this feature in the NEG eSystem, see the *NEG Checklist Enhancements User Guide*, which can also be found on the Web page referenced above.

These tools will assist applicants in preparing more thorough and responsive applications. Once the application is completed in the NEG eSystem, applicants can use the "print" feature to see what the application they are submitting will look like to reviewers, and can compare the application against the appropriate NEG Application Checklist, to ensure all necessary information has been provided.

When providing additional narrative information for which there is no "field" or that exceeds current character limitations, applicants should include references in the narrative to the various application section headings to aid in the review. It is not possible to develop NEG Checklist criteria for narratives and attachments, since the applicant determines what information to

provide to support its application. Therefore, applicants should take special care in reviewing attachments and narratives prior to uploading them, to ensure that the information provided is consistent with the information contained in the application itself. Discrepancies between the application and attachments in areas such as the number of planned participants, whether Rapid Response was provided, and dislocation dates are common, and can result in delays as clarification is sought on which of the conflicting pieces of information is correct.

5. <u>NEG Application Submission and Review Process</u>. There are four phases to the revised NEG application submission and review process:

1) Pre-Application Consultation	2) Application Review	3) Award Decision	4) Award Package (Executed Notice of Obligation and Agreement)
Initial contact between the Applicant and Regional Office resulting in a DRAFT application for Regional Office review and comment.	After consultation and Regional Office review and feedback on the DRAFT, a FORMAL application is submitted by the Applicant.	National Office, with Regional Office input, prepares final recommendation; Secretary makes final funding decision.	Secretary notifies Governor; grant is issued to the Grantee.

Pre-Application Consultation. While the aforementioned NEG Checklist and other tools are intended to standardize the required elements of a NEG application, each NEG-eligible event has characteristics that make it unique. Since NEG applications are not all the same, ETA Regional Office staff can provide guidance to help applicants develop a NEG application tailored to the situation. ETA has found that applicants who take advantage of Regional Office technical assistance when developing their applications submit higher quality NEG applications and are able to secure funding more quickly than those who do not. Thus, as part of the revised NEG process, ETA Regional Office review of draft NEG applications is a formal component of the NEG review and analysis process.

Applicants will continue to enter information into the NEG eSystem to develop their application as they have in the past; however, the Regional Office will now review the draft application using the NEG Checklist before it is submitted formally and provide feedback, as appropriate. The NEG eSystem has been modified to enable Regional Offices to view draft NEG applications. However, at this time, only the application itself can be seen in the "draft" stage; the applicant will need to provide its Federal Project Officer with any supporting documents and attachments that are critical to the application. An applicant should notify its respective Regional Office when it has developed a draft application that is ready for initial discussion or review. The Regional Office will confirm receipt within one (1) day of submission and review the draft application within five (5) business days of receipt, using the NEG Checklist. If the NEG Checklist requirements have been met, the Regional Office will notify the applicant that the application is ready for formal submission. If the NEG Checklist requirements are not met, the applicant will be asked to correct, clarify, or provide additional information to address the missing elements. If thirty (30) business days pass before the applicant prepares a NEG application that meets the NEG Checklist requirements, the Regional Administrator will send a letter to the head of the agency or entity submitting the application, notifying them of the status of the application and offering assistance to advance the application.

Applicants are urged to engage their respective Regional Offices when developing NEG requests. Full participation in this process will provide the quickest and most efficient avenue for applicants to secure NEG funds.

Application Review. Within seven (7) business days of official submission of the NEG application and any supplemental material furnished by the applicant, ETA Regional Office staff will complete the NEG Checklist and, if all requirements are met, upload it to the NEG eSystem. National Office staff will then review the completed NEG Checklist and the application. If there is concurrence that the NEG application is complete and can be considered for funding, it will move on to the award decision stage and National Office staff will prepare a decision recommendation on behalf of the Assistant Secretary. If the National Office staff members determine that there are issues that preclude the ability to make a funding recommendation, this will be communicated to the appropriate Regional Office for clarification. If necessary, the Regional Office will contact the applicant to obtain the clarification or additional information to address the issues.

Award Decision. The Department is committed to announcing the decision to approve or disapprove a NEG request within thirty (30) business days of receipt of a complete NEG application.

Award Package. After the Governor is notified of an approved NEG request, the Grant Officer issues the Grant Agreement and Notice of Obligation (NOO) to the Grantee.

6. NEG Modifications. ETA anticipates that the use of this revised process will significantly reduce the number of NEG modifications that must be submitted, as many modifications result from issues that were present in the original NEG application. This reduction in volume will help the modification process significantly. Once the revised NEG process is in place and fully implemented, ETA will turn its attention to creating a tool similar to the NEG Checklist for modifications. In the interim, in addition to ensuring that all of the terms and conditions from the previous NOO(s) are addressed when preparing modification requests, applicants may wish to compare the modification request against the appropriate NEG Checklist to help ensure that modification requests are complete and accurate.

7. Inquiries. Questions regarding this guidance should be directed to the appropriate Regional Office.