**U.S. Department of Labor** 

Employment and Training Administration 200 Constitution Avenue, N.W. Washington, D.C. 20210



SUBJECT:

**TAACCCT Round 3 Extension** 

September 21, 2015

Dear TAACCCT Round 3 Grantee:

This communication is with respect to the Trade Adjustment Assistance Community College and Career Training (TAACCCT) Solicitation for Grant Applications (SGA-DFA-PY-12-10) awarded in September of 2013 ("TAACCCT Round 3").

For other ETA grants, we are able to grant limited extensions to a grant's period of performance in cases where more time is necessary to enable the completion of program objectives. However, the funding life cycle does not allow for period of performance extensions for any TAACCCT Round 3 grantee, beyond the four year period ending on September 30, 2017. Given the challenges that some grantees have faced in the startup phase of their projects that may have led to delays in program design and implementation, we offer the option outlined below to allow for additional program implementation time while still maintaining the overall four-year period of performance.

On page 19 of the SGA, the section labeled Period of Performance for All Applicants reads, in part:

II. B. Period of Performance for All Applicants (All Applicants)

The period of performance is 48 months, with an anticipated start date of October 1, 2013. This performance period includes all necessary implementation and start-up activities. Applicants must plan to fully expend grant funds during the period of performance while ensuring full transparency and accountability for all expenditures. Awards made under this announcement are subject to the availability of Federal funds.

All programs must be developed and offered within the first 36 months of the period of performance, with grant funds allocated for program development and delivery expended during that time. ... The final 12 months of the period of performance is limited to gathering information and data for reporting outcome measures and completing the requirements for the third-party evaluation; during this timeframe, grantees should not incur costs for any other activities, such as program development and instructor salaries.

This letter revises the SGA requirement in the second paragraph above as follows (shaded text indicates changes):

All programs must be developed and offered within the first 42 months of the period of performance, with grant funds allocated for program development and delivery expended during that time. ... During the final 12 months (October 1, 2016 – September 30, 2017) of

the period of performance, DOL expects grantees to focus primarily on gathering information and data for reporting outcome measures and completing the requirements for the thirdparty evaluation. However, from October 1, 2016 – March 31, 2017 ("months 37-42"), grantees may continue to incur costs for program development and delivery if needed. From April 1, 2017 – September 30, 2017 ("months 43-48"), grantees should not incur costs for any program development and delivery activities.

Please note the following considerations regarding this change:

- This change means you may continue to use grant funds to implement the programmatic activities described in your Statements of Work, such as education, training, and job placement, through month 42 (the quarter ending March 31, 2017). For example, you might opt to continue grant-funded academic instruction through the fall semester of 2016, and then continue grant-funded job placement activities in the first quarter of 2017. Other approaches to extending grant-funded program activities through month 42 are also acceptable as long as such activities are not grant-funded after March 31, 2017. You are not required to submit a modification request to continue funding programmatic activities through month 42, though a budget modification may be appropriate in some cases.
- As originally specified in the SGA, we expect that TAACCCT grantees will sustain successful programs beyond the period of DOL TAACCCT funding. In doing so, the program costs associated with paying instructional staff, career coaches, and equipment (as well as any other program costs) that continue after month 42 must be paid for with non-TAACCCT funds after that date. Ideally, this transition in program funding source will occur with minimal disruption to enrolled students.
- An important consideration in implementing this proposal is that data collection, reporting, and evaluation activities may be affected by the extension of grant-funded program activities into the final year. You should only extend grant-funded program activities into the fourth year after consultation with the third-party evaluator to discuss how the evaluation would be affected by such an extension.
- You must continue to implement your evaluation plans as currently approved. Any change to the approved plan resulting from the continuation of grant-funded program activities into the fourth year would require a Statement of Work change to be approved by the Grant Officer.
- Please note that the expenditure of grant funds on programmatic activities in months 37-42, as described above, is optional. For example, some grantees may have expended all of their programmatic activity funds by month 36. Additionally, you may opt to expend grant funds on programmatic activities during part, but not all, of months 37-42.
- Here is what you should know about performance reporting with respect to this communication:
  - Only outcomes paid for with grant funds may be reported in your Annual Performance Report.

- The final year of the grant consists of months 37-48, which now provides you the option of using the first of these six months (months 37-42) to use grant funds to continue program activities. If you choose this option, you may continue to report on all outcomes (B.1 B.10) for this first six months of this final year.
- During the final six months of the grant period (months 43-48), only follow-up outcomes (B.7-B.10) should be reported and all grantees must report on these outcomes.
- You will only get the opportunity to report one time during this final year, regardless of whether or not you use months 37-42 for program activities. This opportunity will occur at the end of the fourth year (i.e., the 48th month), during the closeout period.
- If program activities (outcomes B.1-B.6) are reported, you must have participant and financial records to support the aggregate data submitted, for example, that individual students were tracked and reported as participants in outcome B.1 prior to the end of the 42nd month.

If you have any questions about this letter, please consult with your Federal Project Officer.

Sincerely,

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STEVEN A. RIETZKE Grant Officer Division of Federal Assistance for Discretionary Programs