**WorkforceGPS**

**Transcript of Webinar**

**Pre-Event YouthBuild Webinar Series**

**Understanding Your Grant Award Package**

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LAURA CASERTANO: All right. Welcome, everyone, to today's webinar. My name is Laura Casertano, and I will be here if you need anything technically speaking. Hopefully, though, you won't need to hear too much from me, but if you do have any technical questions or concerns, just go ahead and let me know in that chat window on the bottom left-hand corner of your screen. That chat window is also where we'd like you to ask any questions or type any comments throughout today's webinar. We'll get to as many of them as we can, and we do love to hear from you.

You'll also notice that we have a copy of today's PowerPoint uploaded in the file share window so you can download it at any time throughout today's presentation. There's also an additional resource up in that file share window. You can download that as well throughout any time during today's presentation. Also, a copy of the PowerPoint as well as the recording of today's presentation will be made available on WorkforceGPS in about two business days.

Now, I'm going to go ahead and move us right into today's presentation. Again, I want to welcome you to today's webinar, and if you haven't done so already, please go ahead and introduce yourself in that chat window. Let us know your name, the name of your organization, where you're located in the country, and how many are joining you, if you're joining in a group.

Now, I'm going to turn things over to today's moderator, Mark Smith. He's a workforce analyst with the U.S. Department of Labor. Mark?

MARK SMITH: Hey. Thank you, Laura. Good afternoon, everyone. Once again, my name is Mark Smith. I'm the national liaison for the Department of Labor YouthBuild program. Welcome to the first of our three-part pre-NGO new grantee orientation webinar series. Today we'll discuss your grant package. Hopefully you'll be receiving your grant award package within the next week or so. There was a short delay on getting those out, but it's important for you to understand that everything that's in your award grant package so that you can have a successful grant cycle.

This webinar is designed to provide an overview of your award package and your roles and responsibility as a grantee. We will also host pre-NGO webinars focused on worksites as well as WIOA. We are also recording today's session. We encourage you to use the archived webinar to have new staff or other members of your team to view at their convenience. Because there is a lot of information to cover, we'll be taking questions throughout the presentation and providing feedback at the end. Please enter your question into the chat box, and we will collect them to cover during the Q&A period. So let's get started.

Objectives are to have strategies and practices to better manage your award, learning how to avoid common mistakes, understanding the role of federal project officers, and useful tips and recommendations from federal project officers. So today's agenda will be a welcome and introduction covering the grant package content, special clauses, YouthBuild specific information, FPO guidance. We'll do some group discussion and adjourn for the day.

So our first polling question was, how familiar is your organization with the grant award package? And it seems that everyone is somewhat familiar. We have a couple ringers in there for being very familiar. We have a few sort of new folks that know very little, and we've got one person that really needs to be on here. So I'm glad that they joined us. So thank you very much. We really appreciate you participating in our poll.

So today's presenters, first, we have Michael Hotard. He's a federal project officer in region one. We also have Ray Garcia, also a federal project in region five. After that we have Jake Blanch. He's a federal project officer in region two. And last but not least we have Jack MacLennan, and he is a federal project officer in region five. So to start off today, Michael Hotard.

MICHAEL HOTARD: Great. Thank you for that introduction, Mark.

MR. SMITH: No problem.

MR. HOTARD: Today I am going to be talking about some of the documents that you are actually going to receive or maybe have received via e-mail. It's a little awkward because I don't think most of you have gotten the grant award. We heard it's coming out over the next couple weeks. So I'm going to be going over some documents you don't have in hand yet, but hopefully our overview will help you interpret and understand those when you get them. I think our kind of first question was almost a trick question. It said, how familiar with the grant award? And I guess there must be some experienced grantees that have had previous grant awards, but it's always great when you do get the new grant award to become familiar with the documents we send because we do change them over time.

So first, I wanted to start off by talking about a document which you should have received. A welcome e-mail did go out in late September and this is our official congratulations from the grants office and it did outline a couple of next steps, including sending program contact information to the YouthBuild office and confirming that we can post the narrative of the award online. If your organization has not gotten anything like this at all, it probably did go to your signatory. So ask them first, but if they haven't gotten anything at all, please notify us so we can look into that.

Next is your grant award package, which is what I'm going to spend the majority of my time talking about today and it hasn't really been sent out yet but it will be coming out either this week or next week. We did want to emphasize that the period of performance did start yesterday. So these grants are active. You can definitely get going on them, but the actual award package will be coming out soon. And when you do get that award package, we usually have three documents, and I wanted to briefly go over two of them and then really dive into the structure of the grant award package.

So one of the letters that we attached to that initial e-mail is a grantee instruction letter with two major processes, the instructions for. One is how to access your funds in the payment management system, and so if you're an experienced grantee, you probably have done this already. If you're new to ETA, this might be a whole new process for you. And the second one I really wanted to highlight are this letter gives you instructions for how to gain access to the ETA-9130 financial reporting system, which is the financial reporting system. A lot of grantees get really excited about accessing the funds, but then they forget to register for the reporting system and the first report comes due in about four months and then they don't have their PIN and password ready and they panic and call us and it takes maybe a couple days to process. So then that first report is late. So go ahead. Look at both sets of instructions. Make sure you also complete the ones and check to see that you do have that access to the reporting system before the first reports are due.

Another part of that e-mail, which is new this year, is a grantee handbook that we've created at ETA. And we collaborated with the national office and the regional office to put together this guide to kind of talk about grants management in general. And so it should cover ETA staff roles, how to do modifications, talk about closeout. We want this to be useful. So we put in already as to what we think you should know, but we really want your feedback as well. So read through it. Share it with your staff and, if you have ideas for how to improve it, let us know but we're hoping this will be a new and really handy resource for you guys to have.

So now, I want to talk about the probably third document that you'll be getting in the next couple weeks in that e-mail, and that's the grant award package. And so what is the grant award? This is your official grant document. It consists of a lot of pieces that we all combine together. It's the notice of award. It's all the clauses and conditions. It's the funding opportunity announcement, the statement of work.

It's your SF424A application, your SF424A budget, your budget narrative, and your indirect cost rate. All that combined is your grant award package, and also, any modifications you make along the way, whether that's requesting approval for something or changing a work site, those modifications have to become officially part of your grant award package in order for you to do them. So a modification is actually really adding to that grant award package.

And so who should read your grant award? All the staff involved in the grant. I really believe that your grant award package is a key document that unites the grant, unites all the staff. It has your goals. It has your outcomes. It has your plan. Everyone, whether it's the program manager or the case managers or even the fiscal staff that you're working with, if they read that grant award, they'll say, this is what we're working towards and really give clear direct goals for everyone. So don't hold it close. Share it with all of your staff.

And the next thing I really want to emphasize is, where should you always look first if you have questions about your grant? And you probably guessed that answer. If you didn't know, it was the grant award package. It is really the key document. It contains your goals, your strategies, your budget. As an FPO, when a grantee calls me and says, I have a question, the first thing I'm doing is pulling up their grant award that we have a copy of and going back to it because most of the time just reading through that you'll be able to find your answer.

And now, I want to talk a little bit about different parts of the grant award and really dive into some of them specifically. So again, once you get your grant award, which most of you don't have now, you'll see it's a lot of parts put together. There's notice of award, special conditions specific to your award – so not everyone has these and not every grantee receives them each time they get an award but sometimes we put specific conditions in just for you – a table of contents which is really useful in navigating the award, clauses and conditions, and then attachments, the SF424, SF424A, which is a budget document, the budget narrative, a statement of work, and the indirect cost rate. So I think all of these, when you do get that grant award, you can come back to the slide and it should match up to what you're seeing in person.

So talking about the notice of award and this will be part of the grant award package and it's a really handy summary sheet. It's just one page, and it contains so much useful information. It's really hard to see on this one. So I'm going to try to get a little zoom effect going, but you can see it shows your name and address. So that should be familiar to you. But it also has your grant award number. In this example, this would be 1IB12345.

And whenever you're communicating with your FPO, whether it's via e-mail or in a report, it's really helpful to reference that grant number. We're working with a lot of different other grantees, and it really ables – that grant number lets us quickly know which grant, which year of YouthBuild we're working with. So that's a really handy number. It has your CFDA number. It has your funding amount. It also has your DUNS number and you should double check these numbers because sometimes there's errors in them and it's best to find them early and notify your FPO. So definitely go over the NOA and make sure everything is correct.

Another part of the NOA is the period of performance. So this is an example NOA. Your NOA should say shall be from October 17th through – and I can't remember the end date, but yours will say October 17th, 2016. It gives you your total funding amount, which you probably don't forget, but if you ever do, then they will be – it's right here. And another part is it references the regulations that you are supposed to know, so 2 CFR Part 200 and 2 CFR Part 2900. As an FPO I work with these every day.

As a program lead for YouthBuild, you probably don't. So you probably forget these numbers, but you can always go back to your NOA, look up those numbers, and remember which ones they are. And the NOA also will have a signature of your grant officer. So if you ever forget who is the person with ultimate authority over your grant, it's right here on the NOA. Everything on this really helpful summary sheet.

So going into some other parts of the funding opportunity – or of the grant award package, the funding opportunity announcement or, as we call it, the FOA or FOA is incorporated into the grant award. So this was the application that you read and then responded to in order to win the award. And because you won the award, then we know that you're familiar with it because you had to write a great application in response to it. It's not included word for word, page for page, but there is a clause that incorporates the full FOA into the grant award.

So this is your main source of information if you have any specific questions about YouthBuild specific policies. The FOA talks about the program design, eligibility, allowable expenses. All of that is included in the FOA. So this is another really great document that you should have. Because it's not incorporated word for word, page for page, you should probably kind of save a copy, maybe print a copy of the FOA and keep it with the grant award document.

Another part of the grant award document that, once you get this document in front of you, you'll be able to go through, it will be your budget. Your budget consists of your SF424A and the budget narrative. I think we're going to talk about a little bit about budget flexibility going. Another day we'll talk about that, but I just wanted to mention that this is part of the grant award document. Again, it contains most of, if not all, the important documents to run your grant.

And then the statement of work, and the statement of work is probably the most important part – I think the most important part of your grant award document. It's going to describe all of your plans and activities for the grant, and it's important to remember that all activities must align with your approved statement of work. So if you're thinking about adding a new training or serving a new type of population, is it in your statement of work?

As an FPO I don't know how many times I've asked that. It's maybe one of the most common questions I ask grantees. And so what does it say in your statement of work? So this is really the heart of your grant. If you're a new program manager and you're not quite sure what you're supposed to be doing, the statement of work should tell you. So this is always where you go back to. It's really important. It's included right in your grant award package.

We're going to talk more about work sites later on, but I do want to mention that work sites are a part of the statement of work. So if you change your work site, that requires a change of statement of work. If you're at a new work site and it's not part of the statement of work, then your activities aren't really aligning. So yeah. You have to be aware that work sites are an important part of that statement of work. And we'll talk more about work sites later, but this is hopefully a somewhat familiar form that you would have completed and sent in with your application.

Part of your grant award package is also your NICRA or Negotiated Indirect Cost Rate Agreement. Indirect costs are a great part of being an FPO and trying to explain them to grantees that may not be familiar with them. If you're a fiscal person, you're probably very familiar. If you're a program person, you're saying, what is this?

But your NICRA is included in the grant award. If you had one when you were applying for it, it would be attached. If not, you need to submit it. If you don't have one, have never had one, you can claim a de minimis rate. But I think we'll talk about this a little more in detail, or if not, you can always talk to your FPO about your NICRA questions. But you'll see that it is also part of that award package. We're really including everything so it's all there. Everything you need to run the grant is included in that package.

This isn't formally incorporated into the grant award package. Just explicitly with all the clauses it does say when you sign up that you're agreeing to do these things. Most of them are in the clauses and conditions, but if you're wondering, what did I agree to do, you can check it out on grants.gov SF424B. Some of these, for example, you just said you would run a successful project, comply with federal statutes related to nondiscrimination, comply with Davis-Bacon. Most of you are probably in compliance with all of these, but it could be nice to check.

Whoa. OK. So that was a quick overview. Again, you don't have that package in front of you yet, but hopefully when you get it in the next couple weeks, you will think, oh, yeah. Michael talked about that on that webinar, and you were able to go back here and refer to this and see the structure and realize how important all those documents are and how they all come together to really inform you and your team.

I'd also really want to share that not just the program manager should read the grant or not just the director. The grant award package should really be shared. It can create a unifying document that everyone in the organization working on YouthBuild understands what the grant is for, how you're doing the grant. It's a really, really great resource.

MR. SMITH: All right. Well, thank you, Michael. We really appreciate that. Some very good information, and it looks like going through – (inaudible) – in the poll question there, and of course it seems like we have some former grantees that at least reviewed the initial submission and the budget. So they've been sharing that with their finance team, and they've got them on board. So – and it looks like everyone else, looks like they either haven't had a chance to – (inaudible) – back yet or they sort of glanced at it with the finance team. Of course, as Michael said, we encourage you all to share the complete contents of the grant package with your team just so your whole team's on the same page – (inaudible).

So next, we have Ray Garcia, federal project officer in region five, and Ray is going to talk a little bit about some special – (inaudible) – that we have as a part of the grant program. Ray?

Ray Garcia: Thank you, Mark, and good afternoon. The following slides review the terms and conditions of your DOL grant and the YouthBuild specific special conditions of award that may appear in your grant package. The front of your grant package lists a table of contents outlining 19 pages of terms and conditions of your award. This slide lists some of the items found in the table which contain vital information for conducting effective oversight of your grant. Let's touch on the first three.

If your organization receives funding from multiple funding sources, details regarding an indirect cost rate can be found in this section. Your DOL budget has flexibility which allows for a 10 percent variation amongst all line items. Now, let's discuss administrative costs in greater detail, and what are administrative costs?

Section three of WIOA defines administrative costs as expenditures incurred by grant recipients in the performance of administrative functions and in carrying out activities that are not related to direct provision of workforce investment services. Please keep in mind that YouthBuild grants are limited to 10 percent of grant funds, both direct and those indirect costs in administration.

Administration is not a line item on the SF424A form. It cuts across all the categories and must be tracked in your accounting system and reported on quarterly. And administration is not the same as indirect costs. Under WIOA regulations, administrative section 683 identifies the activities that are considered administrative in nature.

Some examples of admin costs are general administrative and coordination of accounting, payroll functions, audit and budgeting functions, costs related to oversite and monitoring related to WIOA admin functions, travel costs incurred for official business in carrying out administrative activities, costs of information systems related to administrative functions such as personnel, procurement, purchasing, or accounting and payroll systems. A couple other examples are costs of goods and services required for administrative functions such as office supplies, postage, rental or purchase of equipment and utilities, and costs like subawards – or sorry – subrecipients or contractors that are solely for the performance of administrative functions.

To summarize, administrative costs cannot exceed 10 percent. Administrative costs include both direct and indirect costs, but these costs do not include direct services to participants. And remember that these costs are different from indirect costs.

Here are a few other terms and conditions that you'll need to understand. Audits, details regarding your requirement to hire auditors to audit your grant using proper federal procedures are listed here. All ETA recipients are required to submit quarterly financial and narrative progress reports for each grant award. In this section you'll find detailed instructions and timelines for submission.

Public announcements. Here you'll find the language requirements for issuing statement, press releases, request for proposals, bid solicitation, and other documents described in the YouthBuild project. And when making large purchases, uniform administrative requirements require all grantee procurement transactions be conducted in a manner to provide open and free competition. Now, please keep in mind that even if your statement of work identifies a specific entity to provide goods or a service, your YouthBuild grant award does not provide the justification or basis to avoid competition.

Now, aside of ensuring that all grantees maintain a drug-free work place, let's briefly discuss meeting space approval. Conferences sponsored by the YouthBuild grantee are allowable if the conference is necessary or reasonable for the successful performance of the federal award. That being said, if it is determined that the meeting does not meet this criteria, associated costs will be questioned and may be disallowed. So if you're not 100 percent sure, I would make it a point to discuss this and any term and condition with your federal project officer.

Now, at the very front of your grant package you may notice a page entitled conditions of award. These are YouthBuild specific special conditions that may be present in the grant award packages. They are separate from the overall terms and conditions of your grant award. Now, different from previous years, in addition to reviewing the grant package for deficiencies, DOL had the opportunity to review the work site forms submitted and provide conditions before your grant was awarded.

These conditions are listed within the first pages of your grant package and may also contain the following, incomplete 9143 work site form and missing attachments, target service area not identified, not contiguous, or not closely located, information regarding an annual housing census, or if your grant did not clearly identify the source of matching funds or included unallowable uses or sources of matching funds. All conditions must be satisfied within 30 days after your award.

Here we'll break down the ETA-9143 form and the required attachments. Now, in accordance with YouthBuild funding opportunity announcement, all grantees must submit a current 9143 form, including all required attachments. And the individual housing project site estimate, attachment 1A, which includes a list of estimated resources, must be completed for each property identified as a work site.

The 9143 form also requires the grantees list the current owners of the property on line seven and provide a letter from the owner that clearly states that YouthBuild participants have permission to access the work site and label this attachment 1C. Finally, attachment 1D must describe the specific substantial activities youth will perform as participants on the work site. Please identify and submit all required attachments to your federal project officer within 30 days from the date of your award. The required current ETA-9143 form can be found at the link listed on this slide.

Attachment 1A, documentation of resources. An individual housing project site estimate, attachment 1A, must be completed for each property identified as a work site. This attachment requires the grantees to specify resources such as YouthBuild, other federal private that will be spent on various construction activities of the work site, such as acquisition, architecture, engineering.

This attachment also requires the grantee specify the sources of the construction resources, organization name, the type of resources they will provide, cash or in-kind, and the dollar value provided. Finally, this attachment requires the grantee to attach letters of commitment from each source of funding behind each attachment 1A.

Additionally, where YouthBuild funds are being used for construction, not including stipends and wages paid to participants or trainers, the use of YouthBuild funds must be clearly outlined with the budget that identifies where the funding will be used in order to ensure the grant funds are being spent on allowable construction costs, per TELG 5-10.

If the housing resources information that you provide in attachment 1A and/or the required attachment is incomplete, please provide the completed attachment 1A to your FPO that reflects the required information for all work sites along with the required documentation of provider commitment attached.

Attachment 1C, evidence of ownership and work site access. Grantees must list the current owner or owners of the property on line seven and provide letters from the owner labeled as attachment 1C, which clearly states that YouthBuild participants have permission to access the work site. If your application was missing attachment 1C or provided incomplete or unclear information, please submit the required documentation.

Attachment 1D, detailed work descriptions. Attachment 1D must describe the special – the specific and substantial construction training activities youth will perform as participants on the work site. DOL's most recent YouthBuild specific TEGL, TEGL 6-15 defines a qualifies work site, describes the level of construction work that qualifies a work site. For further reference, a handy one-pager listing all TENs and TEGLs are attached to this presentation. If your application was missing attachment 1D or provided incomplete or unclear information regarding the specific construction work that will be undertaken by YouthBuild participants, please submit the required documentation to your FPO.

There's a second section of the work site description form called the housing census form. In accordance with the funding opportunity announcement, all award – awarded participants must complete the housing census form, attachment 2A of the ETA-9143 in August of each year for the previous 12-month period as a means of tracking the total units of housing completed by YouthBuild programs annually. Grantees should track the units of housing that are completed between August 1st and July 31st of each year in order to facilitate this required data collection. DOL may asked by Congress or may be asked to report to Congress and other stakeholders the number of affordable housing units built or renovated by YouthBuild participants.

In accordance with the funding opportunity announcement, all grantees are required to identify the target community service area of the grant. Grantees must identify one contiguous service area or closely located communities within a metropolitan service area defined by the zip codes to be served. Once again, if your application does not meet the requirements, please identify the issue and submit the requested information to your FPO within 30 days of the award.

Another condition you may see involves matching funds. Grantees are required to provide new cash, funds committed specifically to support this grant project not prior investments, or in-kind resources equivalent to exactly 25 percent of the grant award amount as matching funds. All match funds must only be used for costs that are otherwise allowable with grant funds.

Such match funds must be documented clearly through letters of commitment or MOUs that detail both the source and commitment of funds from any contributing partners. If your application did not clearly identify the source of matching funds or included unallowable uses or sources of matching funds, please submit the requested documentation to your FPO.

In order to avoid a reduction in your grant award or possible disallowed costs, you must fulfill the required response to the special condition. This early risk analysis and review is part of DOL's goal to intervene at an early stage of your grant to ensure that you avoid major obstacles for a successful program. And please, if you identify any possible issues with your grant package or work plan, do not wait for your grant to end before addressing the problem.

Finally, open your grant package, share it, read it, know what it says, review the WIOA law, the Code of Federal Regulations, uniform guidance, and other references. Again, make sure program, fiscal, and other relevant staff have it. And you'll continue to hear this over and over again, but it's great advice. Ask your FPO if you don't understand any of these items.

On this slide you also see a few links to resources such as the electronic Code of Federal Regulations. A final note, in addition to the provisions outlined, there are conditions such as the restrictive covenant clause that are in the DOL only final rule that you need to become familiar with. So read your grant package thoroughly. Now, on to another knowledge check.

MR. SMITH: All right. Well, thanks a lot, Ray. I really appreciate it. So the next question for the knowledge check is, what document provides you with your grant number, period of performance, grant award amount, and applicable Code of Federal Regulations? It looks like somebody was paying attention to the first section. All right. Looks like everybody was, and you're right. It's the notice of award. So I'm glad everyone – (inaudible) – this afternoon. Thank you very much.

Next presenter we have is Jake Blanch. He's a federal project officer in region two, and he's going to talk a little bit about YouthBuild specific sort of program goals. So, Jake, would you like to talk?

JAKE BLANCH: Sure thing, and hi, everybody. Good afternoon. For this session I get to dig a little further into the YouthBuild specific program elements – excuse me – of your grant program by covering some of the key areas that will help you to sort of understand ETA requirements for your grant and how to effectively implement your YouthBuild program based on these requirements.

So for this section we're going to cover your point of contact here at ETA and YouthBuild internal structure, technical assistance resources that are available to you throughout the life of your grant, program timeline and the requirements for quarterly reporting, both fiscal and programmatic reports, the fiscal requirements including the uniform guidance and the METS requirements, and also an overview of the YouthBuild program design. And for that we're going to cover eligibility requirements, performance and outcomes, core management functions, and safety requirements.

So let's start by looking at your ETA team and its players. As you progress through the period of performance of your grants, you'll be working with the federal project officer or FPO assigned to your specific grant. The FPO serves as your primary contact on all matters concerning your grant. These folks have a host of different resources at their disposal that can be of assistance to you throughout the grant management process.

This visual here represents in a very simple way the information landscape as it exists throughout the course of your grants. If you have any questions or concerns, you can always contact your FPO who will then assist you in obtaining whatever is necessary to help your program to be successful.

Among the resources that FPOs rely on is an understanding of the relationships within the Employment and Training Administration here at DOL. They know who to talk to about what. They have strong working relationships with other staff in their region and with the staff in the national office.

You do not see your FPO on a regular basis, but to give you an idea of who they are and what they do, I want you to consider your federal project officers as your primary point of contact here at ETA. You're going to hear me say that time and time again. Questions, concerns, even points of pride that you want to share to celebrate the great work you will be doing, bring that to us.

We're happy to hear these things. We're happy to help you with any of those challenges, and we're the ones to go to first. If we don't have the answers, we're going to get them for you from any number of our different resources that we have throughout here at ETA, our colleagues in other national offices, as well as some other resources that we'll talk about in a little bit.

Your FPO is also the frontline for the ETA grant office. So the previous slide shows some of the other offices that relate to your grant more generally, but the FPO is really the one that has that direct relationship with you. FPOs review grants' financial and performance reports. Sometimes it may feel like you're sending your data into the abyss, but I can promise you that we pour over these reports every quarter to consider what's going well, what challenges might exist, and how we can better support the work that you're doing.

FPOs also initiate modifications to your grant whenever necessary. Typically that's requested by you. Now, Jack's going to talk more about that and what we mean here a little bit later in this presentation. I mentioned before that your FPO is likely the only ETA staff member with a direct relationship with you as a grant recipient.

There's not more evidence than when FPOs conduct grant monitoring activities throughout the life of your grant to ensure everything is going smoothly and that the funds are being managed responsibly. The primary role that the FPOs fulfill is through the provision of technical assistance to you and your staff as the grant recipient.

So with all this in mind, as far as the things that we do as FPOs, it's important to note that the FPO does not have the – has not been authorized to actually approve any changes to the grant scope of work. As a frontline to the grants office, we sort of broker the relationship between the grant recipient and the grant officer, although we don't make the final decision on any major changes. We're here to provide a technical assistance and to count to both you and the grant officer with regards to the best interest of the grant.

With regard to this idea of technical assistance, grantees can request this from the FPO at any time and for any number of reasons. I mentioned previously the FPO provides technical assistance. However, when walking through your working YouthBuild, we have a team of technical assistance providers available to support you and your program. On this team you first have your federal project officer.

As your first point of contact here, you can make requests for technical assistance, and we will work with the Division of Youth Services, the YouthBuild program office here at ETA, and YouthBuild USA who are our technical assistance providers to assure that your program is set up for success. The Division of Youth Services or the YouthBuild program office leads the YouthBuild initiative at the national level and is responsible for developing guidance and policies that govern the YouthBuild program, in other words, most of what we're talking about here today.

YouthBuild USA, on the other hand, is contracted to enhance your knowledge about the YouthBuild core program elements and to develop and implement trainings for DOL YouthBuild grantees. ETA coaches will assist your organizations with improving academic offerings, provide the industry-recognized construction skills training, introducing YouthBuild staff and participants to high-growth and high-wage industries, building organizational capacity on multiple levels, and assisting with forging stronger connections with the workforce system, apprenticeship, and education partners in order to prepare our nation's most vulnerable youth for a promising future.

There's a lot that can fall under this umbrella of TA. So just know that the FPO, Division of Youth services, and TA coaches work collaboratively in this effort to assist your organization with effectively administering the DOL YouthBuild program. You're going to talk to each of us about all aspects of the program, and, in fact, I strongly encourage you do that.

Once again, your FPO is your first point of contact for the YouthBuild program, and it's a good idea to include us in all your communication so that way everybody's on the same page and we make sure that all the information is shared consistently across this network that's here to support you.

So let's talk more about when – when we talk about your period of performance or your POP, we're talking about these three phases of your grant program over the course of the 40-month life of your grant. First, you have four months of planning. During this phase grantees must ensure key staff has been hired, partnerships have been solidified, outreach and recruitment should be ongoing, and work site access is confirmed.

So all the things that you talked about in your grant application, now is the time to really bring them to life. So you're really getting things up and running, and you have the freedom to focus on that implementation plan to make sure that it's reality. So getting these pieces in place can make or break a program that comes to the start of those 24 months of active programming, that active performance period.

You have those two full years to do what you said you were going to do before 12 months of follow up. So remember that the follow-up period is mandatory. So the program as it operates during those 24 months of active programming will either cease or at the very least shift significantly to ensure that the transition of your participants is successful.

So let's talk about the reports. Although you'll be in active dialogue with your FPO throughout each quarter, the goings on within your program need to be recorded and documented by way of three quarterly reports. YouthBuild grantees are required to submit each of these reports to DOL within 45 days after the quarter ends.

These reports include a financial status report or an ETA-9130, which gives a general idea of where spending and match funds stands, a program MIS report or the ETA-9136, sometimes referred to as a QPR, the quarterly performance report which gives us that hard data, and then a program narrative report in which you provide context for the data, and it's a place for the more qualitative side of your work.

The combination of these three reports provide us with a clear snapshot of what's going on in your program. To make things easy, a number of programs that I work with have used these as markers for themselves as well. So they've actually planned out their year to think about when are these quarterly reports due? What sorts of deadlines can we hold for ourselves?

How can we set goals against those deadlines and then course correct if necessary? But more importantly, sometimes it's important to look at these as opportunities to celebrate some of those successes. I know that sometimes we get bogged down with the challenges that show up in these reports, but there are also a lot of successes to be celebrated. So it's a really great time to be able to do that.

So these reports must be submitted online in two different systems. Program reports have to be submitted through the DOL YouthBuild MIS system, and a financial status report must be submitted by the electronic grants reporting system. Now, I also want you to note that many of you are aware YouthBuild falls under the Workforce Innovation and Opportunity Act or WIOA. There may be an additional reporting requirement for 2016 grantees and – but we're going to talk more about that with you in subsequent webinars to ensure that you have all the information that you need in order to meet this requirement.

So like I said, quarterly reports are due 45 days after the end of the quarter and based on the program year, which begins six months after the start of calendar year. Sounds a little complicated; right? And that's OK. I had to read this a few times before I fully understand it myself, but to make things easier, so I want you to take down the notes – the actual dates that are here.

So you'll have plenty of time at the end of each quarter to gather your data and submit it. That being said, YouthBuild USA reviews the data in the MIS system on a weekly basis and shares it with us so that we can proactively provide that technical assistance we were talking about before. So although the reports are due quarterly, it's really in your best interest to have your data updated at all times, which will keep the information flowing and make everyone's job a whole lot easier.

If, in the course of generating your reports, you're having any issues, you should absolutely contact your FPO or at the very least copy them on communication with help desk. For your password and PIN necessary for submitting the financial reports, you need to identify two individuals in the organization responsible for financial reporting. And I believe Michael actually brought this up a little bit earlier, but I'm going to go into a little more detail.

So you have the primary contact person will actually certify the accuracy of the report by entering the PIN. The PIN acts as an electronic signature. The secondary contact will enter the reporting data, but when you contact etapassword.pin@dol.gov, provide the following information to etapassword.pin@dol.gov. In that information or in that contact that you do send to them, you want to include the grant agreement number, the name and phone number of both individuals, the e-mail address for the primary contact person, and then you'll be able to obtain that PIN and password in order to get into the system and be able to work within it.

If you have any other questions, your FPO, again, is your first point of contact. If I haven't already said that yet, I'll say one more time your FPO is your first point of contact. Any questions, hit us up first. We're happy to get you the information you need.

Now, for your performance reporting you can always contact the help desk at the phone number and e-mail address on the screen. And one more time, copy your FPO so that they know what's going on, and if there's anything they can either expedite or if there's any assistance they can provide, they will do so.

In your grant award agreement as well as on your ETA-9130 report form, you'll see that there's a section called the recipient share, which we refer to as the match requirement. The funding opportunity announcement required that grantees must provide cash or in-kind resources equivalent to at least 25 percent of the grant award amount as matching funds. The amount of funds specified on the SF424A budget information form is considered to be the applicant's match.

Now, to get allowable part of this match, the cost must be an allowable charge for federal grant funds. Determinations of allowable costs will be made in accordance with the applicable federal cost principles. If you have any questions about this requirement of what allowable may mean for you and your organization, you know who to contact, the FPO I keep talking about. In addition to reporting this information, be sure to carefully document the sources, amounts, and costs charged throughout the life of your grant. This will be something we take a really close look at when we visit you for the monitoring purposes.

Now, many of you may be aware of the new uniform guidance which refers to the most newly implemented financial regulations for federal grants. For those of you that have worked with federal awards in the past, please be aware that many changes have occurred, and further training will be available on those going forward. For today I'd like us to look at leveraged resources which may differ from match.

Although they are not defined in regulation or any related administrative requirements, most federal agencies use this term leveraged resources. So for ETA programs, leveraged resources could include both required match and other costs that do not rise to requirements of the match regulations but which supports the outcomes of grant activities.

As with match funds, it must be for costs allowable under the uniform guidance. Accordingly, each leveraged contribution should be identified with its associated value and included in your performance narrative report each quarter. What we're looking for here is a whole cost of the program rather than only looking at what is provided through the federal award.

This final point pertains to the Department of Labor conducting past performance reviews before awarding new grants. All too often we see grant applications that propose to leverage incredibly helpful resources outside of the grant award. However, once they are awarded, they prove unable to meet their goal, and the programs suffer accordingly.

So essentially, the leveraged resource commitments that you make now will be factored into risk assessments that can influence whether you receive future grants. Mark, I'm going to throw it back to you for a second to see if we can do a quick knowledge check and make sure everyone's still with us.

MR. SMITH: Absolutely. So our next knowledge check is, the 25 percent match requirement is based on the entire grant amount? So is the 25 percent match, is that for the entire grant amount, or is that for part of the grant amount that you're awarded to – (inaudible)? And it looks like about 43 people think that that's true, and you are correct. So glad that everyone is still with us. So I'm going to give it back over to you, Jake. Jake?

MR. BLANCH: All right. So let's go ahead and talk about the YouthBuild program design a little bit. For YouthBuild you've likely heard about this 50/40/10 split. It's a combination that we talk about when we're referring to how YouthBuild is structured. This comes from the funding opportunity announcement and YouthBuild final regulations.

Sometimes we go into those props or insider shortening of words. But we're talking about the final regulations that require YouthBuild programs to be structured such that participants in the program are offered education and related services designed to meet education needs for at least 50 percent of the time during which they participate in the program. So that's 50.

Now, we look at 40. It's also required that participants be offered work and skill development activities in housing rehabilitation and construction activities for at least 40 percent of the time during which they participate in the program. So for construction plus programs this may instead focus on activities related to other vocational training programs that you're offering.

Although it's not required, the FOA and the YouthBuild regulations state that the remaining 10 percent of a participant's time may be spent on community service and leadership development activities or in the education or occupational skills training. So it's up to you and whatever serves your program best.

When talking about the construction projects that your program will be undertaking, the majority of grant funds should be expended on the construction and significant rehabilitation of low-income properties and homeless shelters. Under WIOA up to 15 percent of grant funds may be used in the rehabilitation of construction of community and other public facilities.

We're talking here about public use buildings such as recreation centers, public community centers, libraries, public park shelters, or public schools. For these community facilities to be eligible as qualifying work sites, substantial renovation would need to occur at these facilities with youth using at least two modules learned through their nationally recognized credential coursework.

This part is important. The work is not simply slapping paint on the walls or fixing a few creaky floor boards. All of the work that your participants will be completing must be aligned with the nationally recognized work credential that they are pursuing. This means that your work site agreements must clearly demonstrate that alignment. If they don't, make sure that you check back and reconsider how you are working within that particular site.

It's not only a requirement but it's also going to help your participants to see the connection between the classroom and all the things that you're doing at your program site and the real world where they're really applying those things on a job site. So YouthBuild is a program that could benefit any number of people in your community, but it's important to note that the YouthBuild funds are intended by Congress to serve a very specific target population.

To this end, YouthBuild funds can only be used to serve individuals who meet the YouthBuild eligibility requirements. So please, as you move forward with your YouthBuild program, it's important that all appropriate staff become very familiar with the eligibility requirements of the program and that you relentlessly document eligibility. This can be among the biggest challenges for programs but has huge implications for the responsible use of these funds.

We'll touch on the actual YouthBuild eligibility requirements. So in order for an individual to be eligible for enrollment into the YouthBuild program, they must meet the following criteria. He or she must be between the ages of 16 and 24 years of age past the date of enrollment. In addition to meeting the age requirement, the individual must also be a member of a disadvantaged youth population and must also be a school dropout or a youth who previously dropped out then subsequently reenrolled.

So what do we mean by disadvantaged youth? The definition of disadvantaged youth is provided by WIOA and DOL YouthBuild regulations, which defines disadvantaged youth as a member of at least one of the following categories, member of a low-income family or youth in foster care, including youth aging out of foster care or youth or adult offender or an individual with a disability or a child of incarcerated parents or a migrant youth.

So again, the individual must be between the ages of 16 and 24, a member of one of these populations, and must also be a school dropout or a youth who previously dropped out and subsequently reenrolled.

Now that I said that, it sounds pretty strict; right? So let's think about this little bit of wiggle room that you do have, and we refer to this as the 25 percent enrollment exception. The 25 percent exception provides grantees a little extra room to enroll up to but not more than 25 percent of the participants in their program that do not meet the disadvantaged youth and school dropout requirements.

However, in order to qualify under the 25 percent enrollment exemption, the individual must be – or excuse me – they must have a high school diploma or equivalent, test basic skills deficient in math or English, or they must have been referred by a local secondary school for participation in the YouthBuild program leading to the attainment of a secondary school diploma. So it's still rather strict. This 25 percent exception is not just anyone. It's a very specific group of people who do not necessarily meet the three criteria that we talked about before but instead do meet these criteria here. The age requirement is still something that is necessary for anyone. There's no exception for that one.

So I mentioned that the documentation is critical; right? So let's talk about the proper documentation that your organization needs to collect and – (inaudible) – to substantiate an individual's eligibility for enrollment into the program. When your federal project officer conducts an on-site monitoring review of your program, one of the items that will be thoroughly reviewed is documentation for eligibility requirements. In essence, we're trying to make sure that the funding is going to the population – (inaudible) – is intended. The left of those columns here should be issue, age, target population like low income or migrant youth, and then the most common documentation.

So, for example, for age verification you must maintain some sort of a legitimate identification documentation showing that the individual is within the required age range for program participation. For the 25 percent exception, you must provide documentation of the test results that will show that the participant is basic-skills deficient.

Typically, documentation to verify eligibility is maintained by the YouthBuild participant file that would either be available on site in hard copies and under lock and key to secure any personally identifiable information or everything is scanned into a digital database. In either case, you really want to make sure that this sort of thing is available and something that can be pulled at a moment's notice.

Now, in addition to some of these requirements that we talked about before, we also want to underscore the importance of one final eligibility requirement of male applicants being registered for selective service. In general, selective service registration must be completed and this status confirmed by your staff prior to enrollment in federally funded activities and services.

Since YouthBuild falls under the purview of the Workforce Innovation and Opportunity Act, that WIOA we keep talking about, male participants between the ages of 18 and 25 must be registered for selective service in order to enroll in the DOL YouthBuild program. That said, there is an edit check in the DOL YouthBuild management information system, the MIS where you're going to be entering all of these participants and their services, that will not allow you to enroll any male participants in the program between the ages of 18 and 25 years if you do not confirm that they have registered for selective service.

Only those males in compliance with the registration requirements are eligible to participate in YouthBuild. To register for selective service, you can direct individuals to the selective service website at www.sss.gov, and typically documentation to verify this registration for selective service is maintained in the YouthBuild participant's – in their participant file. The above-mentioned letter or a printout of the verification from sss.gov – (inaudible) –. For more detailed information about the selective service registration for YouthBuild, I suggest you take a look at the Training and Employment Notice 44-10.

So in addition to selective service requirement for federally funded programs, there's also a requirement for federally funded programs. There's also a requirement that your organization prioritize services to veterans and eligible spouses. At minimum, this is a policy within your organization. However, there's much more in-depth information you can review in the Training and Employment Guidance Letter 10-09.

And I apologize. I'm having a bit of technical difficulties here. If someone else, one of the other presenters wouldn't mind going through the slides along with me, that would be helpful. It doesn't seem like I have control at the moment.

So next, we're going to be talking about the YouthBuild performance indicators. OK. So let's talk about performance. YouthBuild has long measures – six performance measures that you'll be held to meeting. These outcomes include enrollment, recidivism, literacy and numeracy gains, degree and certification attainment, placement, and retention. We're going to review additional or even more specific performance indicators that are part of the program as of this year. Here we have enrollment, which you proposed in your grant application, and two placement indicators.

In the past we've looked critically at the first quarter after participants exit from the program to demonstrate a quick transition to their next step. We're now looking for longer-term indicators. So how many participants are in some sort of postsecondary placement in the second quarter after exit? What about the fourth? And remember placement can be education, training, or unsubsidized employment.

This must – like eligibility, it needs to be documented. Keep in mind that in order to get this information, the follow-up phase of your program must be designed in a ways that support that ongoing relationship with your participants. That part is really critical when it comes to being able to continue to get this information from your participants, then be able to support them in getting from that second quarter to that fourth quarter.

And if we can go to the next slide there, here we're looking at – in many ways, at the competitiveness of the participants. This is a long one.

So I'm going to read this one to you, this first one, this credential attainment. So the percentage of program participants who obtain a recognized postsecondary credential or a secondary school diploma or its recognized equivalent during participation in or within one year after exit from the program, program participants who obtain a secondary school diploma or its recognized equivalent shall be included in the percentage count as meeting this criterion only if such participants, in addition to obtaining such diploma or its recognized equivalent, have obtained or retained employment or are in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.

That's a lot. Here really what we're looking at is the alignment of what the participant achieves within your program and the value to their lives after they have exited your program. So what does that alignment look like and how we're making sure we make that connection for them?

For median earnings it's very similar. We're talking about how did the program services translate to earnings for those participants once they've exited and entered employment. And finally, measurable skill gains. These are the stepping stones toward that credential and success post-program. And can you go to that next slide?

MS. CASERTANO: Jake, are you still with us?

MR. BLANCH: Yeah. I am. If somebody could go to the next slide for me, unfortunately I don't have control of the –

MS. CASERTANO: What slide? We did advance them. Which slide are you looking for?

MR. BLANCH: So we're on YouthBuild performance indicators, the effectiveness in serving employers.

MS. CASERTANO: Is this the slide you're looking for?

MR. BLANCH: Mine has not changed, but – (inaudible) –. So the place I can get to is just read through.

MS. CASERTANO: Yeah. Just – you can just read through it. Yeah.

MR. BLANCH: (Inaudible). Great. Sure. OK. So this performance indicator – (inaudible) – the effectiveness in serving employers, it's still be negotiated with regard to how it will actually be reported. However, we can still consider what it is that we're aiming for here. So first, we have employer retention.

When we see placement in the second quarter after exit and we see placement in the fourth quarter after exit, is a participant at the same job, or did they happen to – (inaudible) – from each quarter? It tells us a very different story, and so what does that say about the value of the program and the participant to that employer?

So it's something that we want to be looking at here when it comes to the effectiveness in serving employers. The second queue, the repeat business customers and employer penetration rates have a lot to do with the relationships that you're building with employers in your community. We're asking the questions, are those relationships ongoing, and do they serve the needs of your community?

If we go to the next slide, we'll be talking about the importance of developing policies and procedures for YouthBuild and its core management function. There's some very good reasons why you should have policies and procedures in place. Many of you I'm actually preaching to the choir here. You may be totally familiar with the reasons for which you should have these policies and procedures in place, but just to make sure that we're all on the same page and we're all thinking about this in the same way.

So first, it's a federal requirement for you to manage the day-to-day operations of your grant and any subrecipient supported activities, if applicable, which is codified in the uniform administrative requirement at 29 CFR 95 and 29 CFR 97. Those are those regulations that were referenced by Michael very early in the presentation.

Secondly, and perhaps more importantly to your staff and participants, policies and procedures provide a framework for grant operations. So they serve as a reference book for how to implement the grant statement of work and ensure consistency throughout the program's operations.

For instance, if your grant states that you're going to offer pay incentives to YouthBuild participants, your policies and procedures should state the criteria first giving incentives, the amount of the incentives, and the frequency of incentive payouts. Written policies and procedures help facilitate consistent service delivery and can be used to train new staff.

So it's something you can use across the board with all of your staff, new or existing. Policies and procedures should also address how federal funds will be safeguarded by being expended only on allowable activities specified in the statement of work and in accordance with the cost principles that apply to your grant.

Although this list is not exhaustive, these are some examples of the types of policies and procedures you'll need to develop for your YouthBuild program. And just to give you a quick hint, these also happen to be the policies that your FPO will be looking for when we begin to monitor your grants.

And so on this next slide, finally we're looking at the safety requirements of the YouthBuild program. These are, after all, construction training programs. So they can be dangerous places, if not properly bound by these safety requirements. Each grantee must adhere to and abide by these safety requirements, all of which you can find in your grant award package.

As such, you will need to first provide comprehensive construction safety training both to your staff and to the participants. Comply with federal and state child labor laws, the occupational safety health regulations. Develop a written job site safety plan, and ensure that a knowledgeable supervisor is on site that has authority to enforce safety. Provide necessary protective equipment. Take measures to prevent injuries, and report all illness and accidents to Department of Labor using the OSHA 301 form directly to your FPO.

So with that, I'm going to turn it back over to Mark to check everyone's knowledge one more time.

MR. SMITH: All right. Thanks so much, Jake. That was certainly a lot of information to cover, and we definitely appreciate all that great information that you provided.

Our next knowledge check is, are grantees allowed 15 percent cumulative budget line item flexibility without grant officer approval? So we see some folks dialing in. So this is one of the things that has changed with uniform guidance. Can I get an FPO to jump in for a second to talk about it? I'm not sure we sort of covered it on the slides. All right.

MR. HOTARD: The amount is 10 percent cumulative.

MR. SMITH: Absolutely.

MR. HOTARD: It used to be 20 percent with some differences for personnel, fringe, and indirect, but now it's 10 percent cumulative. That's kind of a tricky calculation, but you can talk to your FPO to figure out that math.

MR. SMITH: Thank you so much. I really appreciate that.

So it looks like most of you got it correct. So that is false. So it's not 15 percent. It's 10 percent, and that's cumulative over the life of the grant. So even if you do a modification for, say, a budget of 5 percent this year and then do another one for 7 percent increase next year, that would be unallowable for you to do on your own. You would need to seek out your federal project officer, but even in doing that, I would still seek out my federal project officer just to let them know what you plan on doing.

So again, last but not least, we have Jack MacLennan. He's a federal project officer in region five, and Jack is going to tell you a little bit more about FPO guidance. So, Jack, would you like to go ahead and talk to our grantees?

JACK MACLENNAN: Hello, everyone. Next, we're going to be talking a little about grant modifications. DOL recognizes that sometimes circumstances change after the grant is awarded or over time during the life of the grant. So DOL does allow you to request formal modifications to the grant as needed.

Grantees have a 10 percent cumulative budget flexibility, as we said, from the last approved budget per line item. Any one line item that needs to be modified over 10 percent will need grant office approval. Grantees are required to request through their FPO prior written approval from the grant officer before making any other major changes. This includes administrative changes to add an approved or provisional indirect cost rate from a federal agency, equipment purchases.

Note that a modification request is still needed to a purchase or lease any equipment with a per unit cost of $5,000 or more, even if the equipment was identified in the approved grant. Any change in the scope of work requires a modification.

For example, say a grantee wants to change a training work site location in their YouthBuild program. A scope of work modification approval must first be granted before they could alter their project. Grant extensions are possible but quite difficult to justify since the last year of a YouthBuild program is dedicated to follow-up. Plan ahead. Modifications take a long while to get approval and are not automatic. In Chicago alone last year we received over 400 grant modification requests of all different types.

FPOs typically conduct monitoring reviews in the midpoint of the grant period of performance. Ahead of the visit the FPO will discuss the upcoming review with you. A review typically is for up to a week in duration. A review may be just the FPO or a team, including an accountant. Monitoring is a formal process but not an audit. It is meant to be comprehensive.

The review includes topics from the Department of Labor core monitoring guide, but the FPO may deviate from this guide. It entails reviewing projects for a grant term, adherence, and effectiveness. At the end of the visit there is typically a debriefing. DOL will issue a formal report within a few weeks. It may list findings, other areas of concerns, and best practices. Grantees have 30 days for a response to any findings.

On the screen is a list of five main areas of focus listed in ETA's core monitoring guide, which are called core activities. I will not review the content of the guide during today's session but suggest that you ask your FPO, should you have any questions about the process.

Please enter any questions you may have about the presentation in the chat room.

MR. SMITH: All right. Thank you so much, Jack. So we had quite a bit of content to present today for sort of the – if you need to get off at 3:30, you can. However, we're going to stay on to answer some additional questions. We had quite a few to write in. So we're going to try our best to answer as many as possible. We'll stay on the line past 3:30 and see exactly what we get. So feel free to type in any questions that you have into the main chat below the window, and we'll start with some of the questions that are at the top of the page.

All right. The first question is, "Can we charge to the grant award now as a part of getting going in order to make travel arrangements to D.C.?" So I'm going to let Jenn, my director, take that one. Jenn, would you like to answer that one?

JENN SMITH: Sure, Mark. I believe that there was an e-mail that already went out to the signatories because that's the contract that the grant office has. So you might want to check with whomever was the signatory for your grant award. But just to let you guys know – and this has been shared with federal project officers as well – as was mentioned, you're going to get an e-mail saying that your grant award package will be coming over the next couple weeks.

And one of the things that was stated in that e-mail is that grantees should not begin incurring costs until they get the actual signed grant package, and that's just to protect you in case anything does happen during the process of finalizing the grant award that might in any way put your award in jeopardy. We would hate for there to be any sort of cost against it just until you have that completed grant award document. Nothing's final until that stage. So just keep that in mind.

You will be very shortly receiving information about our upcoming new grantee orientation, and I just wanted to make sure you guys were aware that the language in that registration page will also request that same concept, that until you get the grant award, you shouldn't incur costs. And so what we mean by that is definitely don't book a non-refundable flight; right?

But what you can do is certainly do things like register for the new grantee orientation so we know your intent is to come, and you can also call the hotel and register or book your hotel room through the hotel block because that – there's no commitment and you can cancel that later. So that's sort of the place where we are at this point. You can certainly start planning for the fact that you will be spending money as soon as you get that grant award, and I hope that helps. I know it's not ideal, but unfortunately, that's the situation we're in right now. OK. Mark?

MR. SMITH: All right. So the next question is, "Will you actually be getting a physical copy of all of the grant award package, the notice of award, the SF424?" And the answer is yes. So that's going to be mailed to you for your signature. So you actually will receive a physical package.

The next question is, "Can you review the difference between administrative and indirect costs?" Michael, would you like to take that one?

MR. HOTARD: Sure. This answer is probably a little too complicated to cover fully at the end of this webinar but it's a common question we get and so it's one that your FPO would have experience, kind of go into a greater depth. Indirect costs are a type of costs, and administrative costs are specific classification of costs.

So an indirect cost is a cost that cannot be clearly allocated to any one grant or funding stream, and so, therefore, it must be charged kind of across all of them based on a certain percentage, whereas an administrative cost is based on the function of the cost.

Some administrative costs can be direct and some can be indirect. An example might be you might have someone working on the grant. Maybe you have a fiscal staff person that does something related to the participants, and you're able to directly allocate their costs to the grant. You can track how much time they're spending on the YouthBuild grant so it's a direct charge. So that's a direct charge. Might not be indirect, but because it's a fiscal function it would be classified as administrative.

So I guess kind of the big questions are, can we directly allocate this cost? If not, it would be an indirect cost. Is this cost an administrative function? If so, it's an administrative cost. And again, I encourage you to contact your FPO if that sounds confusing because this is something a lot of grantees, especially new grantees to ETA, it does take a while to sink in. So we're happy to cover that for you in more detail.

MR. SMITH: All right. Well, thank you very much. The next question we have is, "If a work site needs to change, is it OK to – (inaudible) – site?" Yes. Absolutely it's OK, but you do need to talk to your federal project officer because it needs to be approved just in case – for – sort of there's a form, a 1943 form. So that needs to be submitted to your federal project officer and OK'd through our office before you change the site. So just want to make sure that you understand that you need to reach out to your federal project officer.

And the same with the next question, which is, "How do we make updates to our statement of work?" So that's another thing that you would talk to your federal project officer in regards to sort of what the changes are. Do they sort of reflect budget modifications or sort of the scope of the work? And your federal project officer can walk you through the steps and make sure that you're submitting the correct request.

The next question we have is –

MS. SMITH: Hey, Mark? Mark? Yeah. Sorry. I also just wanted to – I think that's a good opportunity to make a quick plug related to the thing about the work sites. As Mark mentioned, there is a form and you obviously want to make sure before you use a work site that it's approved because otherwise you could have unallowable costs. But we're actually going to dive in more depth into that exact issue and making sure that people understand some of the risks and liabilities and how to avoid them when it comes to finding work sites on next Tuesday's pre-new grantee orientation webinar. So we certainly would encourage you to join and find out more information there.

MR. SMITH: Great. Thank you so much, Jenn.

The next question we have is that, "I've sent an e-mail twice letting YouthBuild know I need to be added as a project contact but we still keep getting e-mails stating that we haven't gotten our contact info yet." Jenn, do you want to talk about that one?

MS. SMITH: Yeah. So I just want to apologize, Veronica, if it feels like we've been harassing you. That certainly wasn't our intention. I can confirm for you that we do have your contact information for Chris along with someone else on your team.

So we do have the correct contact information for you. If any of you felt that you received multiple requests for contact information after sending it to us, I do apologize. I will let you know that we lost a very integral team member a few weeks ago right during the period when she would have been manning that e-mail address and pulling all of that information for us. So there is a possibility that some of it was missed while we were getting new staff on board, and so I do apologize.

We're doing our best, and mostly the goal is just to make sure we are getting the information to the best people on your team. We're pretty close to getting the full array of contact information that we need, but we do still have a few grantees that haven't. So a few have not yet gotten us that information, or if you're getting an e-mail because we don't think you have, please do just go ahead and send it to us again. And I apologize and can tell you we'll stop harassing you very shortly. So appreciate your forbearance with us.

MR. SMITH: All right. Thanks.

So our next question is, "The Department of Labor website quoted a different amount than what we applied for, and we need to submit – our federal project officer says that we need to submit a modification." So I'd like – Michael, would you like to take that one?

MR. HOTARD: Sure. For – sometimes there are differences in the amount awarded and the amount applied and that's not very common but if you have been in contact with someone at the Department of Labor, I think just continue to follow up with them, if you have specific questions, and have another contact maybe you can follow up. But that is a possibility. So I would say work with them. Try to get that document ASAP. I'm not sure if there would be a delay, but if they're saying that, then it's possible that there is. So if you have questions, they seem – they're probably the best contact to help you through that process right now.

MR. SMITH: All right. Thank you, Michael.

The next question we have is, "During planning, which is now, the planning period, can we reach out to technical assistance to help?" Jenn, you want to talk about that one?

MS. SMITH: Yeah. Absolutely. So a couple of things are in the works. While you guys are planning your implementation, we are doing the same thing, and so just to let you know a couple of the steps. For those of you that aren't familiar, we have an existing technical assistance contract that supports all the YouthBuild grants and that's with YouthBuild USA.

And as part of the process of on-boarding new grants, we share the information with YouthBuild USA about who you guys are, sort of figure out who the brand new grantees are, so somebody that has some experience with a DOL YouthBuild grant award, and based on that we assign technical assistance coaches to each of your programs. We will hopefully be – very shortly be sending out that information to you.

Usually the way it works is that we coordinate with your federal project officer who will be named in your grant award package. So none of this will happen until after you get the grant award package, and then the FPO will coordinate with the coach to have a welcome call where they can kind of talk about the array of technical assistance that's available to you, any immediate concerns you have, sort of the initial process of working with your federal project officer, and the role of the TA coach.

So that will be coming immediately in probably the next month or so but definitely your implementation period is still an active part of your grant and you should certainly be seeking technical assistance as soon as you think you have any need for it.

MR. SMITH: All right. Thank you very much.

So our next question is, "So when will our first report be due?" Michael, do you want to take that one?

MR. HOTARD: Yes. The first reports are due on February 14th, 2017. You can always just take the end of a quarter and add 45 days but since this grant's starting in October, your first quarter ends in December and then 45 days after December 31st is February 14th.

MR. SMITH: All right. And our next question, "In terms of the 50/40/10 split of the program design, could you go into detail on what would qualify as allowable in terms of community leadership aspect – in terms of the community leadership aspect?" Jenn, you want to take that one?

MS. SMITH: Sure. So – oh, sure. Thanks, Mark. Sorry.

So I think what we're referencing here is that 10 percent that we talked about that could be other work outside of the specific vocational training and/or the specific education training components of the program model. And what we're referencing here is any sort of activities that are otherwise allowable with grant funds but they could be tied to things like construction projects, meaning that it could be building park benches; right?

So that doesn't necessarily fulfill your vocational training elements in terms of being low-income housing, but it has a aspect that's giving back to the community by building benches in a park but may also still be tied to construction because they're still learning some construction skills. It could also be things like get out the boat efforts or raising money for a local charity. I mean, the community leadership piece is really about just sort of developing that leadership component in your youth.

A lot of the YouthBuild programs, strong practices include using their youth council to develop some of those community service opportunities. But basically the gist is, if you're going to be using grant dollars, it needs to be otherwise allowable costs. But in general, a lot of the community development work are things that don't necessarily have a direct cost to the grant but provide opportunities for leadership development and community service. That's really what we're referencing. We have a lot of materials about this I think on our community of practice, which you'll be hearing a lot more about at the new grantee orientation.

MR. SMITH: And, Jenn, I guess to piggyback off that question, "Can you apply these guidelines through a construction plus model?"

MS. SMITH: Yes. You absolutely can. The same idea applies that, whether you're doing – whether you have youth who are involved in the construction component or whether you have youth who may be doing education and then construction plus in demand fields without ever doing any construction, that 50/40/10 split still applies to the offerings that you give each year.

MR. SMITH: All right. The next question is, "Is there a system to use for registration?"

MS. SMITH: I think – this is Jenn again. So I'm just going to take a guess here. I think that what this person is asking is about registration as a participant in the program. And if so, I think what – the answer there is that, yes. There is. And again, we will be talking more about this at the new grantee orientation. You will also shortly be seeing information on a training opportunity to learn about the management information system for brand new grantees, and that will be in late November or early December.

But we do have a system that we offer to grantees that we expect you to use in terms of enrolling youth, tracking youth services, and then tracking the outcomes after exit. And we will be getting into that in more detail at the new grantee orientation. So we will be offering you a one – (inaudible) – system to you.

MR. SMITH: All right. Great. So, "What measurements would be permissible for the 25 percent exception in terms of gauging skill deficiency for those persons with a high school diploma?"

MS. SMITH: OK. So this is another one. There's actually a standard – so basically, the Department of Education is the agency that determines what are allowable tests, and we defer to them. But basically, these are all of your standard basic skills, literacy, I guess curricula is sort of the word. So it's things like CABE. CASAS you may have heard of. We do provide more information on this again when we get into the MIS training.

We also have additional documentation that will be coming out via the – some guidance coming out this fall under the Workforce Innovation Opportunity Act. But again, it's basically what you're looking at is anybody who's considered basic skills deficient by the Department of Education if they are below a ninth grade level in reading or math per any of those tests. So that's the short answer, but we'll certainly be providing you more information of what – about what some of those allowable tests are.

MR. SMITH: Awesome. "How will we know if males 18 to 25 have registered for the selective service?"

MR. HOTARD: Yes. There's another webinar participant that actually answered this, but if you go to sss.gov, which is the Selective Service System's website, you can verify someone's registration with just their last name, social security number, and date of birth. And that's a great way to verify that all of your participants have registered. And if not, there's information on that site for how they can register.

MR. SMITH: Great. Thank you. "With reference the eligibility requirement incarcerated parent, does the parent have to be incarcerated at the time of enrollment or at any time prior?" Jenn?

MS. SMITH: Yeah. This is actually a great question, and I'll be honest. I don't think we've ever gotten this before. But what I can tell you is, per the Workforce Innovation and Opportunity Act final rule for YouthBuild, which is Section 688.300, if you guys would like to specifically look this up, where we describe our regulations related to eligible participants, it very specifically says current or formerly incarcerated parent. So either or when it comes to that question.

MR. SMITH: All right. Our next question is, "Are we required to obtain legal status of the students like citizenship?" FPOs or Jenn?

MS. SMITH: Yes. So – and actually, this is – it's really great to kind of see this. You can see that some people were sort of communicating with each other through the chat feature, and I saw that somebody did answer this question on behalf of whomever asked it. But yes. You do have to document that the youth is eligible to work in the United States, and there's actually a section of the Workforce Innovation and Opportunity Act.

It's Section 188 of that law, and it specifically says that we cannot discriminate against non-citizens so long as they are eligible or – excuse me – authorized by the Attorney General to work in the United States. And so that can be a broad array. It's not just citizens and nationals. It's lawfully admitted residents, permanent resident aliens, refugees, asylees, and parolees in – described in that section. But obviously, they do have to be eligible to work. That is really the key thing that they're legally documented.

MR. SMITH: "How long should youth be in a YouthBuild program?" Jenn?

MS. SMITH: So this is another thing that is legislatively mandated. In the YouthBuild section of the Workforce Innovation and Opportunity Act it specifically states that the offering – so here's a thing to understand as well. There's not a specific requirement for each individual youth. There is a requirement for the length of time that the curriculum is offered because you may have some youth who are ready to exit your program earlier than the requirement. But the minimum curriculum time – curriculum time – excuse me – you should be offering for a YouthBuild model is six months, and there is a timeout period. You cannot serve a youth for longer than two years, 24 months.

MR. SMITH: All right. So is it legal – "Is there any flexibility for age limits like a student being 25 or 26 years old?" Jenn?

MS. SMITH: Yeah. The answer there is that no. That is, again, something else that's legislated, and unfortunately, we do not have flexibility about things that are specifically put into the law. And the law is very specific that youth must be at least age 16 at the date of enrollment, and they cannot be older than 24 at the date of enrollment. So you could have a youth who enrolls in YouthBuild on the last day of their 24th year. Their birthday, they could be turning 25 the next day, but at the date they enrolled they cannot be already 25 or older, if that makes sense.

MR. SMITH: Great. So, "Is there a need for a modification if a grantee remains within 10 percent budget flexibility?" Michael?

MR. HOTARD: If you remain within your 10 percent budget flexibility, there is not necessarily a need for the budget modification, but any time you do see kind of significant funds moving around a grant, another concern is is it affecting your statement of work? Are you able to do what you said you would do? So if you are moving funds around, it's good to have that conversation with your FPO and kind of talk to them. But if you do not go over that 10 percent amount, then you wouldn't necessarily need a budget modification.

MR. SMITH: All right. Great. So, "Can a grantee charge over 10 percent indirect cost if they're approved indirect cost rate is over 10 percent? Would this require a mod, if it is allowed?"

MR. HOTARD: So I think there's a few different questions kind of embedded in this question. Generally, yes. You can charge over 10 percent, if that's what your approved indirect cost rate allows. Would this require a mod? It depends on whether or not you included that indirect cost amount in the initial grant.

When you made the application, you might have put the actual amount of indirect cost that you could charge, in which case you wouldn't need a modification. I think embedded in this question is kind of a related question about administrative costs, and then this gets into the issue I addressed very briefly before about a difference in administrative and indirect costs.

There is a lot of overlap there, but there can be some differences. So while there is an administrative cost cap, there is not an indirect cost rate cap because those are two separate categories. And I think this would be another – I know we keep saying this – another great conversation with your FPO to really sort through these issues specifically to see what your situation is.

MR. SMITH: All right. And sort of in relation to that, "What is the average time for payment of invoices for grant expenditures?" Michael?

MR. HOTARD: This sounds like – and once you have access to that PMS, which is the payment management system, you do direct drawdowns from that. So what is the average time for a payment of invoices? So you're incurring costs for your staff, for your youth, for your other expenses. How you pay for those is kind of up to you, but once you're ready to – for the grant to reimburse you for them, you really just do a direct draw, and I think it's really quick. I hear it's – I don't actually know the exact mechanism. Maybe another FPO wants to chime in, if they do, but most grantees have told me that it's really quick to pull those drawdowns once they have them ready for the system.

MR. SMITH: All right. Jenn, I think this is a question for you. "Can we enroll deferred action youth trainers?"

MS. SMITH: Right. Yes. Thanks, Mark. So this is another good question. What this person is referencing is I believe the Deferred Action for Childhood Arrival Initiative, also known as DACA or Dreamers. And this is a good question. We actually put out a Training and Employment Guidance Letter on this a few years back, TEGL 02-14, and I would definitely recommend that everybody look at that.

It's probably going to be updated because that references the Workforce Investment Act, which was our previous legislation, but the general intention of that TEGL is still the same. And basically, what it says is that in order for you to serve DACA youth, they still have to meet that requirement that it was in WIA and still remains in WIOA, which is that the youth has to be eligible to work and that has to be documentable. So that's really still the answer there.

MR. SMITH: And the next one is more of a – sort of a WIOA question, a clarification on employer retention versus placement – and placement retention. "Are these two different numbers or one and the same?" Jenn, you want to take that one?

MS. SMITH: Sure. This is a good question, and again, this is one of those areas where we would definitely be having more guidance coming out. We are anticipating hopefully before the end of this year there should be a Training and Employment Guidance Letter that is going into great detail about exactly how the six WIOA performance indicators are contextualized and defined. So there will absolutely be more information coming about how all these measures are defined, but the short answer is that these are two separate numbers.

What we're generally looking at – I think what you're referring to as the placement retention, that's what we would have called it under the three common indicators that we had with the Workforce Investment Act. But now, it's not even really – so there's a placement in the second quarter measure, a placement in the fourth quarter measure. Those don't even have to be the same placement.

So it's really kind of removed that idea of sort of a placement retention measure, but then when you look at the – the long explanation of the employer engagement measure is that we are really kind of using our what we call transition authority under WIOA to try out a couple of different measures across different programs.

For instance, a lot of the state programs will be trying some of the three measures that were described as part of the employer engagement indicators, and one of them is the retention with an employer.

So while the two placement measures are not tied to retention in and of themselves in terms of how you count them, they could end up being a retention measure if it's what you're tracking in terms of the employer engagement. But the employer engagement measure overall, however we decide to determine and define that, is different from those placement measures that we described.

I know that's a rather confusing explanation. Again, we will provide a lot more context in this at the NGO. We'll be diving into it at our MIS training, and we will definitely have a lot of detail on it in that TEGL that's forthcoming.

So I don't want to get too far into the weeds with that just because we could spend the next hour and a half talking just about those measures, and this is really meant to give you just a brief overview. I know you're all anxious for information on it and we'll get to it as soon as we can but I apologize. I know we have a few more questions we have to get to here before we sign off. So that's all I'm going to say at this point. Thank you.

MR. SMITH: All right. So we're going to be able to take a few more questions and then we'll provide a transcript with the written answers and the archived webinar.

So the next question is, "When will the NGO registration be open?"

MS. SMITH: Yes. And I also actually – I'm going to go ahead and answer the question after this as well, which was, "Can you e-mail out the registration information?" So the answer to both those questions is, registration has not gone out to anyone. It will go out to those primary contacts that we have. For anybody for whom we don't have the primary contacts yet, we will be sending it to the signatory because that's the only information we have.

So another incentive for you to get us your primary contacts, if you have not yet. That will probably go out tomorrow or the day after. So definitely be on the lookout for it. If you don't see it by the end of this week, certainly feel free to reach out to your federal project officer and let them know or any of us on this webinar that you haven't seen it yet and we'll make sure that you get it. So it should be forthcoming shortly, but none of you have missed that registration yet.

MR. SMITH: All right. "If you're continuing work on an approved site through a 2014 grant, do we still need to submit a work site mod?"

MS. SMITH: Yeah. So that's a good one. So if you have not – if you did not include that same work site as part of your initial application for this 2016 grant, then you absolutely do. Please understand that in every way possible, your 2014 and your 2016 grant awards, if you received both, are separate grant awards. You cannot mingle funds between the two to serve the same participant. You cannot enroll the same participant in both grant classes simultaneously.

We have a TEGL that is very specific about this, and one of the attachments on this webinar is a full list of all the sort of specifically pertinent to YouthBuild TEGLs, including that one. I believe it's 02-10. Please read it and become familiar with it, if you have multiple grants, because you don't want to get into trouble by comingling your funds. So what that means is that we also consider your work sites separate.

You could be working on that same work site across different grants, but you need to have approval for that work site in each separate grant. So you would need to submit the 9143 on that work site with your 2006 grant application – or excuse me – as a grant mod, if you have not done so yet.

MR. SMITH: "What if you have a designated point of contact, however those individuals have not been receiving e-mails?"

MS. SMITH: Yeah. So this is a good one. I think I would just say here, probably because we haven't sent any out since we really started to get a lot of those contacts. We just did a push for some of those points of contacts a few days ago, and prior to that, like I said, we were bringing on our new staff member who was still collecting the information.

So the initial e-mails that we sent out regarding this webinar did not go to those points of contacts because we didn't have the information collected yet. And again, I do apologize for that. We will definitely make sure that the NGO and all future e-mails are going to those points of contacts we have, but we just needed a little bit of time to get somebody on board and to help us collect all the information. So we appreciate your patience with that.

MR. SMITH: "Does an emancipated minor who is homeless count towards eligibility?"

MS. SMITH: Yeah. So that's a good question. Yes. I think the thing there is homeless.

I mean, obviously the point is that would probably be one of those areas where we'd end up doing self-attestation related to them being low income. But what I would also say is at this point we are still waiting for the final information that would be in that TEGL, like I said, that's coming out related to the performance measures because there are some changes under WIOA about how we do some of this – how we do some of this documentation and what's allowable sources of documentation.

So yes, I think that that participant would clearly qualify as low income, but in terms of how that's going to end up being allowed to be documented, I can't speak to that yet until we get further guidance developed with WIOA. So please bear with us on that regard.

MR. SMITH: OK. And our last question, "When do we register for the PMS system?" Michael?

MR. HOTARD: Well, when you get the award package sent to you, there should be a document called instruction letter, and that instruction letter will have instructions for how to register for the PMS system. So you can do that, read those instructions, and turn that around the same day and start that process. I think it probably takes a week or two to process all the paperwork, but you should be getting those instructions when you get the grant award package.

MR. SMITH: All right. Well, thanks, everyone, and those were some very, very good questions. And we're going to move forward with a few resources. These are some of the key TEGLs for YouthBuild. They're all provided within the attachments file on the webinar. So you have them all here so you can sort of go down and review them a little bit more thoroughly.

And here's some additional resources. Here's a link to our YouthBuild Community of Practice. There are tons of great research materials and manuals and just really, really good things that could really help your program. Here's also a link to the Code of Federal Regulations or CFR, the Code of Federal Regulations, the annual addition, and uniform guidance, which we referenced a lot. And here's all of our contact information. The first is for Michael. The next is for Ray, then Jake, then Jack, and myself.

So we also want you to look forward to our upcoming series which is going to be on successful work site management on October 25th from 2:00 p.m. to 3:30 p.m. And then after that we're going to close out with WIOA and YouthBuild. So that's going to be on Tuesday, November 1st from 2:00 p.m. to 3:30 p.m.

And of course our new grantee orientation is going to be November 15 through 17, and it's going to be here at DOL in Washington, D.C. So we look forward to seeing everyone there, and thank you very much. Have a great afternoon, everyone.

MS. CASERTANO: All right. I'm just going to ask our participants to stay logged into the webinar room for just a couple moments longer and give us some feedback.

(END)