**WorkforceGPS**

**Transcript of Webinar**

**YouthBuild Webinar Series: Documentation Requirements & Key Guidance**

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JONATHAN VEHLOW: So without further ado, I'd like to turn things over to our moderator today, Toni Wilson, national YouthBuild liaison, U.S. Department of Labor. Toni?

TONI WILSON: Thank you so much, John. And good afternoon, everyone. Welcome. We're very excited to present information today around documentation. As John said, my name is Toni Wilson. I'm one of the national liaisons here with the YouthBuild team.

Today's objectives, we're going to review some of our previously-issued DOL guidance. We'll also share some information on key documentation requirements for eligibility and performance outcomes. And we're going to be providing some best practices to help ensure adequate documentation is provided.

Today's agenda, we'll focus and reference to YouthBuild-related guidance; so you'll get some information on that. We'll do a deeper dive on documentation. Really focus on some of the more popular monitoring findings, just to kind of help – (audio break) – look out for. And then we'll focus on closeout and documentation that's needed on that. And then, as always, we'll be highlighting best practices for documentation and allowing an opportunity for Q&A officially at the end. But please, if you have questions along the way, enter your information in the chat and we'll be sure to address those.

With that said, I'd love to introduce our presenters today. Today we have Adrian Barrett, who's a federal project officer for Region 3; Douglas Harris, known as Doug, Doug Harris, who is an FPO for Region 4; and Antonio McKoy, who is a federal project officer for Region 2. We also have William Mitchell, who is an FPO for Region 3.

And we're going to start out today with Jenn Smith, who is the national YouthBuild director here at the Department of Labor. And Jenn will be talking and giving us a review on some of our previous issued DOL guidance. So let me hand it over to Jenn. Jenn?

JENN SMITH: Thank you, Toni. All right. So I have to say that I was very pleased to see the high number of registrants for this webinar.

I know that certainly guidance and documentation are not our most exciting or participatory topics. But that being said, it is obviously a very, very important part of the work that you do and very important part of grants management. And so I took it as a very good sign that so many people registered, because I think that means that you guys understand how important a role this plays.

And on our end, it means certainly that we realize that it's always good to do a review of this information. I think sometimes we forget, because there are a lot of repeating YouthBuild grantees, that sometimes it's easy to forget that even if that's the case, new staff come on board, people who have been there before sometimes need reminders about the large numbers of guidance documents that we put out annually, and we also have new grantees who may not have had this information before.

So we wanted to really just take the opportunity now to do a really good and thorough review of the YouthBuild-specific and YouthBuild-related DOL guidance documents that have come out that it's important that you guys understand. Hopefully all of you will take good notes on this session so you can share it with coworkers, staff, whomever, that really needs to hear this information. And of course, this webinar will also be archived. So please do keep that in mind; it's always something you can go back to and view the recording of it after the fact.

So that being said, Toni did mention that we are going to generally hold questions to the end. But at the same time, as you have questions you can feel free to put them into the chat box. So as you're thinking of them, certainly do put the questions in there, because we don't want you to forget them. But we will try and address most of them at the end. If there's something particularly pressing that we notice that's really relevant to the slide we're on, we may choose to answer it. But generally we're going to hold for Q&A until the end of the session, and we'll make sure that we have time for that.

So with that being said, I wanted to first just dive and do a quick refresher on where you can actually find DOL guidance. When we have new guidance that comes out, we try and send emails through our Youth.Build@dol.gov email address to all of our active grantees, to make sure that you're aware that such new guidance has been issued. But sometimes it's hard to remember where those emails went or you don't always save the information. And so we want to put the power in your hands that you can, for yourself, find guidance at any point.

And it's also good – you may be managing multiple DOL programs. It's always just good to know where to find this guidance yourself and do a review. Because we're giving you the key guidance, but there may be other things that you find helpful or beneficial that we don't think to share with you. So I would strongly encourage all of you to go to the guidance site and just do a review of it, see what sort of information is out there.

So that being said, there's sort of two ways that you can get to where we store the guidance on our DOL/ETA website. The first is by going to www.doleta.gov, which is sort of our landing platform for everything Employment and Training Administration related. And if you go there, across the top are a series of different options, and one of those is "policy and guidance" toward the right-hand side. And if you go to "policy and guidance" and click on it, there's a dropdown.

I'm sorry. I'm saying that incorrectly. I apologize. You go to the resource library; that's the tab you'll see. And if you go down, one of the options towards the bottom is "policy and guidance." So if you select that, it will then take you, actually, to this website that's listed. You might also choose to just directly bookmark this website, which is listed there, wdr.doleta.gov/directives. So those are the two ways that you can find it.

Once you get there, in terms of finding a specific TEGL or TEN – and I should also make sure that – I'll dive into this a little bit later, but a TEGL is a training and employment guidance letter; or a TEN, which is a training and employment notice. We're going to review the TEGLs and TENs by number and so that'll help you to have an understanding of which ones are relevant.

In order to find those once you're in the directives list, you would select TEGL or TEN from the current advisories list. And then the second number after the dash, in any TEGL/TEN listing, is the year it was published. So there's a right-hand column where you can select which year you're looking for. So you would select TEGL or TEN and then you'd select the year and then you'd select the button that says "list" at the bottom of that page. And then a list of all the TEGLs and TENs that have been published in that year will come up.

The newest TEN – or TEGL, rather, depending on which you're in – will be at the top of the list. So the lower the first number is, the closer to the bottom of the list it's going to be. So for example, if we have 35 TEGLs in a year, say, for 2015, TEGL 35-15 will be at the very top of that listing; TEGL 01-15, the first one was published in that year, would be at the very bottom of the list. And hopefully that makes sense.

Of course, you can also always ask your federal project officer if you have questions about where you can find specific guidance.

All right. So now I want to dive in. Again, as I mentioned, this is not going to be the most exciting part of this presentation, but we do think it's really important that we just give you a good overview of all of the guidance that's been put out that is relevant to YouthBuild. So we're going to start with the oldest guidance documents and work our way forward to the present.

So you can tell from this guidance, it was a training and employment notice, it was from 2007. And again, that's done by program year. But it was one of the later TEGLs in 2007 – or, excuse me, TENs in 2007, since it was from – it was number 44. So probably toward the very end of that year, just to help you understand the numbering convention.

So this one is actually I think very useful, even though it was originally published quite a while ago. And that's because now, under WIOA, all YouthBuild programs are required One-Stop partners. At the time that this TEN was published, this was not the case. But we were still strongly encouraging these partnerships because they just make the program model that much stronger. There are many resources at the One-Stop that will benefit YouthBuild participants.

So this kind of provided some good examples of what partnering and collaboration with One-Stop centers look like, provided some specific examples of how some YouthBuild programs had partnered. And again, as I mentioned, it's a good one to look at now because now that you are required One-Stop partners, this can give you some good examples that can help to flesh out the memorandum of understanding process that you'll have to go through to figure out what the relationship will be between the YouthBuild program and the One-Stop.

OK. TEGL 14-09; this is another important one. This is one that we still certainly refer a lot of grantees to. It's a good reminder. And what this relates to is the idea of making sure that grantees understand what are allowable costs when it comes to mental toughness and/or orientation, depending on what you call it.

Generally we know that our YouthBuild programs do conduct a mental toughness component. However, where those mental toughness components are done prior to enrollment, as they generally are, this is a good reminder TEGL about the fact that anything that happens prior to enrolling the youth really limits the use of grant funds for that activity. You cannot spend money on participants before they are actually participants.

So during that process where you're trying to determine who you will ultimately enroll, you have severe limitations on the ability to use grant funds. This would be a good time to use something like leveraged funds. Again, you couldn't use match funds because match funds have to be for the same allowable purposes as YouthBuild grant funds. But if you have leveraged funds from a particular partner, you might be able to use those funds to support any sort of activities that had a cost for the youth during the mental toughness component.

So this just gives you very clear guidance around what are and are not allowable costs during the mental toughness component of your program.

OK. TEGL 02-10; this is another important one that we actually just put out a change to this TEGL, middle of last year. And so what sometimes happens with TEGLs is the guidance in them – and I apologize, TEGLs or TENs; it's relevant for all of our guidance – the guidance in them may still be very helpful or beneficial, but we may need to just create a little bit of clarity the further away from the original guidance we get.

And when that happens, or we find that the guidance that was contained in the original document is not sufficient or more detail is necessary, we can do what's called a change. And that change just sort of builds on the original TEGL. And this is an instance where we did that.

And the point of this TEGL is that the original TEGL was indicating the fact that when we started getting to a point where we had multiple – we had organizations that had multiple active YouthBuild grants, which we know is fairly common for some grantees now. You might have a 2014 grant and a 2016 grant. If both of those are active at the same time, the important thing to understand is that you cannot blend those grant funds to serve the same youth. You have to have separate accounting and tracking policies.

If you finish one grant and you want to continue to serve a youth in the new grant, you have to exit them and then enroll them separately into that new grant. You have to create a clear division for the services and individually served participants with individual grants. And that's a very important policy.

The change we created was to clarify that this policy is still in effect for current and future years of funding. The original TEGL only really talked about 2007, '8, and '9 grant cycles; so we wanted to make it really clear that at this point, this TEGL is in effect in perpetuity going forward.

OK. TEGL 05-10; this was one of the first really substantial policy TEGLs that we did related to YouthBuild specifically. And this is a really important one. This provides – and again, I still reference this one very often, particularly when it comes to reviewing worksite forms for grantees and determining whether the worksite form – the worksite – the money that's going toward the worksite is allowable.

Some grantees do use YouthBuild grant funds on the worksites related to the construction. And that's OK, as long as they follow the provisions in this TEGL. This TEGL very clearly lays out what are allowable construction-related costs with grant or match funds when it comes to the worksite training. It also provides more clarity around how match funds work with YouthBuild and the allowability of match funds and the requirements of match funds.

But I always like to specifically turn people's attention to the attachment that comes with this TEGL, which is called "YouthBuild Selected Items of Cost." This provides a really handy chart that spells out some of the sort of large categories of costs that may go into building a home, and demonstrates whether they are allowable, allowable with conditions, or not allowable.

And one thing I really want to point people to that I think is a good just sort of rule of thumb for understanding the allowable construction costs in a YouthBuild program – and you'll really see it if you look at this chart – is the only things that are allowable with YouthBuild grant funds when it comes to construction are things that result in direct worksite experience for the youth, and direct training.

So for instance, architecture fees, an important part of building a house, but the YouthBuild participants have no part in the architectural design of the house. So you cannot use YouthBuild grant funds to pay for those architectural fees. Another good example, appliances. You cannot use YouthBuild grant funds to buy the appliances themselves because the YouthBuild participants have nothing to do with the building of those appliances.

So everything that is an allowable cost with grant or match funds when it comes to construction have to be for materials or products that will be directly tied to the training that they receive. And I think that's a really good rule of thumb to understand with this TEGL.

OK. Next we have TEGL 15-10. So this TEGL is one that we put out a while ago. And again, this is one of those broader ones; it's not just for YouthBuild, but it's certainly relevant for YouthBuild. And the idea here is that it really just provides sort of a deeper dive into understanding credentials, degrees, certificate attainment, and sort of what are allowable credentials and what grantees should be looking for.

And they have a great credential resources guide, which is attachment two of the TEGL, which provides specific information to help grantees make informed decisions about whether a credential may or may not qualify.

We certainly hear a lot from grantees – and we do understand the frustration – that we don't have a comprehensive list of what are allowable – what is the fully allowable list of industry-recognized credentials? And for many reasons, we are never going to have that. Industries change over time in terms of what they do and don't allow. By the time we collected that list, it would probably be out of date.

There's also the fact that this is not controlled at the federal level. If states recognize a credential, then that's a qualifying credential. And the federal government can't keep a list of state-level determinations.

So this TEGL provides a good background on how you can identify whether a credential could or couldn't qualify. And check in with your local workforce development board is one really good way to confirm that process.

A later TEGL that we're going to talk about – one of the brand-new TEGLs under WIOA – also dives into this same area. But this kind of goes into a lot of detail that I think is really helpful and still really relevant in terms of just understanding what the Department of Labor is looking for when it comes to industry-recognized credentials, and what those important aspects and characteristics are of credentials that qualify.

OK. Next we have Training and Employment Notice – TEN – 13-12. This is a really great one that we put together working with our Office of Apprenticeship. And this really describes what a quality pre-apprenticeship program looks like. And in particular it has sort of a list of elements of what makes a pre-apprenticeship program qualifying.

One important thing to point out with this is that under WIOA, in the WIOA Final Rule, this was slightly updated and revised. I still think there's a lot of really good content in this TEN, as it describes sort of some of the strategies for collaborating with registered apprenticeship and the path to facilitated entry and articulation. But the – sort of the how we define a pre-apprenticeship program was expanded slightly with WIOA in a way that I think is actually really important.

And that's to make it so that – previously in this TEN, the way it really describes it is that there must be direct entry as that final thing that makes something a pre-apprenticeship program. And we created a little more opening in the WIOA Final Rule language, which is to say that we said that partnerships that facilitate direct entry – meaning that that's an opportunity, but not necessarily always the end result – is the way that we describe it now.

And a lot of that had to do with conversations that we had as a YouthBuild team, as well as other programs, around some of the factors that can make direct entry difficult that have nothing to do with the pre-apprenticeship program model itself. So clearly it's still very important. You have to have the partnership. You have to have that registered apprenticeship entry point, but there are other ways to demonstrate a pathway that can lead to facilitated entry, even if it's not that every single youth is going to have that direct pathway.

So that's something to keep in mind. So still a lot of good background information in this one.

OK. TEGL 35-12; so this one – this is a very important one that really kind of builds on some of what's in TEGL 15-10 that I just described, about what are sort of the elements that make an industry-recognized credential qualify. And what we were really trying to do with this one is frame the recognized – the nationally-recognized construction credentials that we usually talk about the most, and frame that within the sort of explanation of 15-10 about what it means for a credential to qualify.

And so what we were really trying to make sure that programs understood with this – and again, so this is still a very important TEGL – is that having a youth pass perhaps one module of a credential is not the same thing as them being in that credential. Many of these industry credentials may have multiple steps to full credentialing.

And so we wanted to make sure that our grantees understood that process and understood that they should not be indicating in our management information system and their performance outcomes that somebody achieved the credential when they perhaps only achieved one of the modules. And so that's really kind of the key component of this is making sure that grantees are accurately identifying and documenting credential outcomes for the construction certification.

Also relevant to this is the fact that, with WIOA one of our six new performance measures is what's called the measurable skills gain. And I think the great thing about the measurable skills gain measure is that it actually allows for sort of the documentation that I think a lot of our grantees were doing.

So that really, as a youth is on the path to the construction credential, where they perhaps pass some of those interim steps, some of those modules that grantees were trying to previously count as an outcome for credentialing, wouldn't count as an outcome for credentialing but very well could count as a measurable skill gain.

So it can still be reflected with the new performance measures in a positive way, which is what I think the goal was with our grantees. So I think that's a really great step, that we're recognizing those middle steps, in terms of skill gain, in a way that we weren't previously.

Apologies. I'm starting to jump ahead of my own notes here. OK. Sorry.

TEGL 7-14; this is a really important one as well. This is where we put out our guidance related to what it means to be a construction program, and really just tried to clarify some of the things that we put into our previous YouthBuild Final Rule – as well as also it's still in the WIOA Final Rule – around what is required to be a Construction Plus program.

So it explains the need for it to still be in-demand industries that you're training in. It provides sort of the understanding of the minimum threshold for doing construction, even when you're a Construction Plus program. And also it had a really handy considerations attachment that just provides sort of some policy considerations for grantees to consider when they're developing a Construction Plus program, around what are maybe feasible Construction Plus industries for the youth that you're serving, based on sort of the backgrounds, the level of education, their age, et cetera.

So that's definitely still a really good and relevant document for grantees to look at. And I also want to point out you may be seeing a bit of a theme here, because the fact is it's not just – our TEGLs are guidance, as in, like, here's the official rule about what you have to do; but also a lot of what our TEGLs and TENs may contain is good policy information, and also really some technical assistance information for you, to help you build stronger program components. So hopefully you're getting that sense from our review here.

OK. Next we have TEGL 6-15, another huge one that we consistently refer to. Toni Wilson and I were discussing this one just earlier today. This is a great one and it's one that we ourselves certainly reference often. It's certainly one that I encourage FPOs to use and share with grantees as well.

A lot of our grantees still really struggle to understand what makes a worksite qualifying. What is the level of construction work that needs to be taking place on a construction worksite for it to be qualifying for YouthBuild?

A lot of this comes down to many of you may have had conversations with your FPOs over the years around having to provide what's called attachment 1D of your worksite form ETA 9143. That attachment 1D is the thing that really describes to us what sort of construction work experience with these youth be getting on this project?

And when it comes to brand-new construction it doesn't seem to be as much of a problem because clearly, generally, the youth will be doing a broad swath of different types of construction, from framing to dry walling, laying foundation, roofing, carpentry, finishing, flooring, et cetera. When it comes to some of the rehabilitation and renovation projects, this really becomes a key concern for us, to make sure that those rehabilitation projects are sufficient in terms of the level of construction experience that it will give youth.

And so I would strongly encourage programs to definitely go back to this TEGL and really read what we say about depth and breadth in terms of making a worksite qualify, and what sort of the baselines are for that. And if you have questions, before you submit a worksite form I would encourage you to reach out to your FPO and sort of just – you could put together a description about what that depth and breadth means.

Have them look at your attachment 1D description so that you can have a sense, before you get too far down the track of submitting all that – the documentation that I know goes into a new worksite form submission – and make sure that it would qualify. That could save a lot of time and heartache down the line.

OK. TEN 8-16; now, this is one of our brand-new ones. Now we're really getting into the post-WIOA world guidance. So I know that probably on this webinar we have grantees who are across the spectrum, between some of our grantees who may still be under WIA if they're a 2014 grantee. If they're a 2015 grantee, they're under WIOA, except they're still under WIA performance. And then 2016 grants that are fully under the full provisions of WIOA. So we're sort of running the spectrum here.

But regardless of whether something directly applies to you right now, the hope is that you probably are interested in future YouthBuild grants, so there's no time like the present to start really becoming familiar with what's happening under WIOA.

So the key thing to understand with this TEN – this was one of our first notifications to the broader WIOA workforce system around what we were planning for performance going forward. As many of you may have realized from the fact that 2015 grantees were under WIOA except for performance, it takes a long time to really adopt new performance measures. I mean, there was a lot of work that had to be done to clarify, contextualize how the performance measures would be calculated and how they were defined and what populations were included in them.

And so, on top of that, because YouthBuild has a case management system, there's also the fact – and this was true for all of the grantees, including the formula and state systems – everybody had to start changing the case management systems they had so that they could accurate report for WIOA. And a lot of that takes years. And so that work is still happening.

So what this TEN did was to signal to our grantees and the workforce system that that transition is happening and that it's happening slowly, but sort of what the intent was that was coming down the pike.

And so what this TEN really says for YouthBuild is that we are using what's called the transition authority, which allows us to take time to do the full transition that's necessary to become WIOA compliant, to phase into the collection and reporting of the WIOA common performance measures. And additional guidance is still being developed around that.

The work is slow but steady around developing the capacity for YouthBuild to fully report all six performance measures. And so this is just signaling the intent that it is going to happen, but it may not happen right away.

OK. This is a very, very, very important one for all of our YouthBuild grantees. This TEGL, 10-16, actually is describing how those six WIOA performance measures are calculated and contextualized. So this really describes who's included in the measures. How is the measure calculated in terms of the performance rates? What does exit look like? It also includes things like – which we've had with YouthBuild consistently – what are other reasons for exit that don't count against a program or a participant?

And then again, as I mentioned, when it comes to credential attainment, this TEGL also builds on what was in TEGL 15-10 and describes in some more detail what qualifying credentials look like and who could be the source of those credentials. So you should definitely continue to keep your eye on this one.

OK. TEGL 11-16; this is the most recent YouthBuild-specific TEGL and we're really excited about this one. This builds on something that we've stated in the WIOA Final Rule for YouthBuild, where we heard from a lot of – I assume – YouthBuild grantees and the public about how difficult Davis-Bacon is to sort of understand and grantees wanting more clarification around where there might be exemptions or accessions to Davis-Bacon.

And so we stated in the Final Rule that that was not really a regulations issue but something that we would deal with in guidance. And so this TEGL was our attempt to do so.

So we worked very closely with the Wage & Hour division to put together this TEGL that tries to give a little more clarity to grantees around the fact that, yes, there are some small exemptions where the Davis-Bacon and related acts do not require prevailing wage requirements for our YouthBuild participants. But that generally, where they're in effect, YouthBuild programs are not exempt from Davis-Bacon. There is no aspect that removes YouthBuild from the Davis-Bacon and related acts compliance.

We heard a lot from grantees about the fact that we used to have the YouthBuild training apprenticeship program and that did create an exemption, but we do not have that anymore. So YouthBuild programs really need to understand Davis-Bacon and the types of federal funding that triggers Davis-Bacon, so that they don't end up in a position where they may end up having to pay participants on construction training sites a very high prevailing wage in order to be in compliance. So this is a very important one as well.

OK. TEGL 17-16; this is the most recent TEGL that we are talking about on this webinar today. This is a very important one, again, because starting with the 2015 grantees, YouthBuild grantees are required One-Stop partners. So again, I'm going to go back to one of the – actually, the first TEGL that we talked about, just to come full circle here, and that was TEGL 44-07, which talked about ideas for collaboration with the One-Stop system and what some of those partnerships could look like.

Coming full circle, now is the time where you have to start implementing this partnership. So it might be a really good time to look at that TEGL and see what's relevant in there. And then what this TEGL does is provides a lot more clarity specifically around the infrastructure funding requirement.

We've talked about this a lot. We've talked about it in several WIOA webinars. We had a whole session on it at our new grantee orientation last November. But I know it's a complicated issue and there are still additional guidance pieces coming out. I mean, this only came out less than a month ago, I think, and they're still developing more guidance related to the One-Stop partnership and what it looks like.

I know one piece that they're really hopeful to put out there is an example of what a good memorandum of understanding could look like – or I should say memorandum agreement; I can't remember exactly which wording to use – between a One-Stop and one of the partner programs, so that you can really understand what sort of detail it should have.

But within that memorandum is a subset called the infrastructure funding agreement that really describes in detail exactly what the cost sharing is for partner programs. Now, again, it's based on the proportionate share of use of the system. So all this kind of comes back to, it sort of depends on how much the YouthBuild program is partnering with One-Stops and what that partnership looks like as to what the funding cost will be.

But I know that we've gotten a lot of questions from grantees about what is this piece? What does it look like? So this is a really good TEGL to give you a better understanding of exactly what needs to go into that.

For those of you who have not yet gotten to that point – hopefully a lot of you have already kind of gotten over this hurdle with your One-Stops. But if you haven't, this is a really helpful TEGL. And even if you have, it probably still has some good information for you to understand.

So OK. So I'm now – oh, I'm sorry. Sorry, Brad. We seem to have a delay with the slides just not moving. I apologize. I was waiting to see if it would move, but – so I'm – so I'm going to go a little bit out of order now, you'll notice.

We're now back to TEN 13-11. And that's because – I apologize. I apologize. I blinked and I think I missed the movement and I got myself confused. Sorry. That's what happens when you do real-time webinars.

So this and the other one that I just showed you, these are slides that you'll notice are out of order in terms of the going oldest to newest, right? So this TEGL is from back in 2005 and then the other one that I'm going to show you in a minute is from 2011. So why I'm sticking these on the end, though, is because I now want to segue to the other part of this presentation, which is really going to focus specifically on documentation and the importance of documentation.

And I think that sometimes sort of understanding that can get a little lost in the shuffle of trying to put together a good YouthBuild program model and really serving the youth. But documentation is one of the most important things that you have to do and you're required to do as YouthBuild grantees. So it definitely felt like no time like the present for us to really refresh you guys on some of the importance of that.

And I'm thrilled to say that we have four federal project officers who are going to speak shortly who can talk to you in detail about exactly what it looks like when they're out in the field and they're looking for documentation, and where grantees can tend to get themselves in trouble with that.

With that being said, I do just want to draw your attention to this TEGL from back in 2005. This was really – I'm not going to lie. It's clearly quite old. It's really related to the Workforce Investment Act documentation guidance. The reason I'm pointing it out here, though, is because the guidance for WIOA is still being fully developed and additional guidance will be forthcoming.

And I believe that once that happens, most likely TEGL 17-05 will be rescinded, which is – when a TEGL or a TEN is no longer in active effect because the information contained in it is no longer relevant, then that TEGL is "rescinded." And when you look at the list of TEGLs and TENs, it has a status under each one that will tell you whether it's active or whether it's been rescinded.

But right now, TEGL 17-05 is active because we haven't yet gotten out the full WIOA guidance. We don't want to rescind old guidance until we have new guidance. So for right now I would say this is still a really good one to look at in terms of understanding what some of the allowable sources of documentation for eligibility and performance outcomes looks like.

And again, I think some of this will still be – I mean, frankly, I think probably the majority, but that is just my opinion; we won't know until it comes out. But I think there's just generally sound practices for documentation in here. And until we get new guidance, this is the guidance you should follow. So we want to make sure that you're aware that this guidance document exists.

And now, I apologize. Thank you, John. On to the next slide.

Again, as I just mentioned, so this was a YouthBuild-specific document that we did that really provides specific detail on some of the eligibility criteria related to YouthBuild and how you could document each one of those pieces. And we're going to dive into that, as well as the performance documentation, in the next couple of slides.

So this right now is clearly still in effect. However, I think it's safe to say that we will probably try and revise this one as well in the coming year, once the overarching WIOA documentation guidance comes out, because there were some minor changes to the eligibility around YouthBuild, and also so that our documentation guidance is consistent and compliant with the broader WIOA documentation. So this is another one that will probably eventually be rescinded. But again, still in effect right now and so you should be paying attention to it and aware of it.

OK. So as I just mentioned, the reason these had asterisks next to them is they are probably eventually going to go away, but for now they are still really good TEGLs to know about and they share some good information for you.

The other thing to point out is that we do have the YouthBuild toolbox, which is sort of our handy-dandy resource guide for many things YouthBuild related. And one of the things that's contained in that toolbox is a YouthBuild eligibility guidelines and source documentation chart. And so I just wanted to draw your attention to that. And the next couple of slides we have will be kind of pulling some information from what was contained in that YouthBuild eligibility guidelines and source documentation chart.

So specifically, when it comes to YouthBuild, what are some of the documentation – what are sources of documentation that you can use to document the age of your youth? You'll see here driver's license or government ID, school records or school ID, birth certificate, hospital birth record, passport, naturalization certificate. All those seem pretty straightforward. Those are things that you would want to have copies of and keep on file at your program so that you can demonstrate that you were serving only eligible youth. Very important.

OK. For selective service, again, this only applies to a subset of you. But those youth you are serving who are male and between the ages of 18 and 25, they are required to register for selective service. And here are the many different ways that you can verify that they did so. Another option is certainly if they have not, our MIS system actually has a hyperlink to www.sss.gov so you can actually help them get registered right there while you're working with them. But certainly that is something that's required, so you will want to have documentation that it did happen.

Low income. A lot of different ways that you can document low-income status in terms of the youth that you're serving. And this is a pretty broad listing of the. Many ways that you can have a copy of any of these materials and have them in your case management files so that you can document that they were low-income.

Next. A youth who is an individual with a disability. Some of the ways you can do that are through a Social Security Administration disability statement, academic or medical records, or a statement from a physician.

For a youth or adult offender, you could have court documentation; you could have proof that they reside in a detention facility, group home or state-run facility; letters from their parole or probation officer; police records; and in this case an applicant statement or self-attestation. There are limited places where we do allow self-attestation, but sometimes we do understand that that is – that that documentation that is available, and we're very clear about where self-attestation is and isn't allowable.

For migrant youth, you can document that through employer statements, wage records or family wage records, and/or their work permit – or a parent's work permit, rather. Excuse me.

For a youth of a child – youth who is a child of an incarcerated parent, you can either look at court records or, again, this is another instance where you could do self-attestation from the youth.

So youth who is basic skills deficient. This one's very clear. The U.S. Department of Education keeps an updated list of approved tests. And some examples of that that many of our programs use are CASAS or TABE, but there are a few others that we know programs use. Work Keys comes to mind and there are a few others. As long as they are approved by the Department of Education and you have that pre-test that demonstrates that they are below the 9th grade skill level, then that would be your documentation. But again, you would want to have that record.

Documentation requirements for performance outcomes. Again, very important. Grantees – so like I said, some grantees are under WIA performance measures and some are under WIOA performance measures. Guidance is still being developed for documenting outcomes in WIOA. And as I mentioned with TEN 8-16, we are using transition authority to slowly implement WIOA performance measures. And that means that we're sort of in a period of transition, as I mentioned, for that documentation and verification of performance outcomes.

And that's why I referred you to the existing and current TEGLs and TENs, as we have them now, which should be your source of guidance until new guidance is created and the old guidance is rescinded.

So again, some very important reminders, though, what this means. Transition authority is not an excuse to not provide documentation. That will not get you out of possibly having negative repercussions if you are not documenting the things that you need to document. And again, as I said before but cannot reiterate enough, until the new guidance is provided, you should operate under the existing guidance.

So in terms of documentation for performance outcomes, when it comes to placements into education or employment there are a couple of different ways you can do this. Most commonly for employment, wage records and/or supplemental data sources are used. Administrative records are often used for documenting placement into education or training.

So what does this mean? Supplemental data sources for employment, education, or training placements could be things like employer contacts; a letter from the employer, signed, that says, yes, this participant is employed with me, they started on such-and-such date. Clearly, paystubs would qualify.

And administrative record sharing agreements with education providers – i.e., the community college gives you verification that this youth was enrolled in the program and they did sign up for the first – or did attend the first day of classes, or paid their tuition for the first quarter, things like that.

Related to that, credential attainment. In order for that credential to count, you would clearly need to have a photocopy of that credential, or some version or copy of that credential that's on file, that documents it was attained.

For the literacy/numeracy gains, again, you would have the copies of the test records. You have the pre-test to demonstrate they were basic skills deficient, you would have that post-test that shows the gain, and both of those would have to be stored together to really document that gain.

For median earnings. Now, clearly this is a new WIOA measure. The best way to document median earnings is with wage records. But supplemental wage data sources that might be possible are through, again – this is something that I would definitely raise with your One-Stop partners in terms of trying to help you to have better documentation. If they have access to some of the administrative wage data records, part of the agreement could be that they can share it with you, potentially.

So that may be a way for some of you to be able to use wage data where you yourself don't have agreements to get the wage data. You might be able to get it through the One-Stop system partner.

Another way, again, is some sort of employer contact that verifies the salary or the biweekly take-home pay, et cetera. And then also, again, paystubs would document those earnings.

All right. So at this point I have given you sort of the high-level summary of what is allowable documentation. And now I'm going to turn it over to William Mitchell with Region 3 and he's going to talk to you a little bit about documentation and the Core Monitoring Guide. William?

WILLIAM MITCHELL: Good afternoon, everyone. I just wanted to start off by saying that if you didn't document it, it didn't happen.

So one of the things that I use when I go out on a site visit is the Core Monitoring Guide. This is a key tool that FPOs use to determine the compliance and non-compliance with documentation. The Core Monitoring Guide is intended to be used to review the fundamental processes and procedures generally applicable to all ETA grants. The FPO uses this guide to determine compliance with specific program requirements.

And compliance can be determined by documentation required and generated by your grant award and your statement of work. These are the things that will be used to determine whether you're in compliance or not. Documentation that's required by your statement of work, they will be looked at by your FPO. And if it's required by the grant award, they will also be looked at.

One of the things is the compliance can be determined by the presence and accuracy of these documents. So if these points that I'm going to go over, if you say no to any of these points, then chances are you are not in compliance. So let's talk about a few of these key documents.

The organization maintains policies and procedures for core management functions and program operations. What does that mean? Well, what determines when a policy is needed? Are there areas in which policies are needed and hasn't been addressed? Then, since your grant may require you to have and maintain a drug-free environment, do you have a policy and procedures on drug testing? Do you have documentation to show that you've followed those procedures? These things will be looked at.

And again, if you don't have it, it means that it doesn't – it indicates that you haven't done it. So you have to make sure that you do document these things. If you say that you have these procedures and you have these policies, they have to be adhered to.

Current written personnel policies. I'm sure that you probably have these, but they should be in an place where they can be seen and everybody should know what these policies are. And they should meet the requirements for federal laws and regulations, and they should be in force. Because the FPO, they will take a look at these policies to see if they're in your – if you're following what you said you're going to do and you have an organizational practice that adheres to these policies.

Your hiring procedures; are they conducted and recorded with the grantee's organizational personnel file – policy, I'm sorry? So you have to make sure these policies are accurate and that you are adhering to them.

Written policies and procedures that describe grant match requirements, allowable match, and methods for tracking match have been issued to all parties affected. Now, does your policy address the match requirement, cost, and contribution allowable? You have to have policies that determine this, and you have to have a method of tracking this.

One of the ways that I track it when I – when you do your quarterly report, you have to identify in your financial – the quarterly financials, which is your 9130 – those expenditures for your match and the match that you're supposed to – the match that's required. Does it appear that the written match requirement policies and procedures reflect actual grantee organizational practice? Make sure that they do, and you have to follow those.

Records are available to demonstrate that match is being tracked. Again, the FPO can do that on a quarterly basis using the 9130s. But when they come out on your monitoring visit, they will be looking at files from your – and documents that your financial section has.

Federally-required reports are submitted within designated timeframes. Your quarterly reports are due 45 days at the end of the quarter. The end of this past quarter was December 31st, so you should have turned in your quarterly reports. Financial reports are also due during that time.

Another report that's due in the YouthBuild program is the census report. That's the once-a-year submission. So make sure that you submit these reports in a timely manner.

The absence of – I'm sorry. I'm just – OK. This is my next slide.

OK. The organization has an approved budget that is compared to actual expenditures on a regular basis. Now, the purpose of doing this is so that you don't go overboard and spend more than you have. You only have so much money to spend. But if you're not keeping track of it on a daily basis, chances are you may go over.

Having an approved budget means that it's approved by DOL. And when you submitted your application, you submitted it with a budget. And that budget came back with an agreement and that's your approved budget.

Now, if you have changed anything in the categories and you've increased it more than 10 percent, or you moved money around and you haven't accurately kept track of it, at the end of the performance period you may have a problem when you get ready to do your closeout because you may have – your budget will not be approved for some of the things that you may have moved the money around in.

The organization has an approved indirect cost rate or cost allocation plan. When you submitted your application, some grantees submitted with a negotiated cost that has been approved. And it may or may not be effective throughout the grant. In a case where this happens, if you receive an updated indirect cost rate, you would have to submit that to DOL within 30 days to get it approved. And that's done through a modification to have that indirect cost rate included into your – incorporated into your budget.

The grantee is serving eligible target population identified in the grant. And this was brought up when we talked about the documentation for eligibility. Those things will be looked at and it'd probably be located in the participant files. The FPO will look at those files and determine whether these participants are eligible to be in the program. In some cases, an individual that's found to be ineligible and gone through the program, you could receive disallowed costs for this because you provided services to someone that was not eligible for the program.

If the FPO determines that the grantee is in non-compliance with the grant agreement, statement of work, or federal regulations, a report will be generated and – with required actions. The grantee will probably have about 30 days to submit a response to this and take corrective action to correct these problems.

All grantees should have a copy of the Core Monitoring Guide and you should review it. If you don't have this Core Monitoring Guide, you should check with your FPO and have him to provide you with a copy. And if there are areas you need to go over with, he would be more than happy to go over with you the areas in the Core Monitoring Guide that may be confusing to you.

At this point I'm going to turn it over to Doug. Doug?

DOUGLAS HARRIS: Great. Thank you. Good afternoon, everyone. What I want to talk about now is the most common monitoring findings for YouthBuild that lacks documentation. And we're going to start out with the category of service and product delivery.

And the first is not providing the full range of services stipulated in the grant agreement. In your grant agreement is a list of services that are outlined, and these services must be provided according to your statement of work. And there are also timelines within that grant agreement and you also must stick with the timelines as well. So those are some of the things that we look for. So for services, that should be provided to the participants.

Not recruiting and serving eligible target population identified in the statement of work. We talked a little bit about that. But grantees must have a plan in place, indicate specific strategies and activities designed to inform their target population about the grant services that you're offering. And also the plan should have an initial screening process, an assessment process, to determine who are appropriate for and who will benefit from those grant services. And it also should include marketing materials that's specific to that target population.

Placement documentation that's not present is a common finding. As it was stated earlier, if it's not documented, it did not happen. Documentation showing that participants have been placed in employment and education must be included in the file. It must be somewhere – you must be able to produce that to show us that this is happening. Because what we will do, we will compare that documentation with information reported on the ETA 9136.

Likewise with credential documentation not being present in the files, supporting documentation for credentials attained. It must be included in participant files. And what we will do, that documentation must support what has been reported on the ETA 9136.

So our next category we talk about is program and grant management. The first one is a failure to maintain policies and procedures for core management functions and program operations. You should have a YouthBuild program policy and procedure manual and it should govern operations and outline staff responsibilities to the grant. And the policies should include the YouthBuild components, the incentives, stipends policy, supportive services, exit and follow-up, administrative policies and procedures. It should include policies for performance goals and outcomes, the application process, outreach, and your recruitment guidelines as well.

Failure to provide source documents for reported match. We've touched on that already, but all match reported on the ETA 9130 must be supported with source documentation. And these documents must be available while the FPO's on site, to demonstrate that the match is being tracked.

Does not properly document that participants meet selective services requirements. I think Jenn covered a slide earlier of the documents that you can use – that can be used to show that you are ensuring that the individuals have registered with the selective services. But according to – (inaudible) – and the FOA – the funding opportunity announcement – male participants age 18 or older must register with the selective service system before – and we emphasize before – services can be provided. And if they turn 18 while participating, they must register at that time.

Non-compliance with eligibility requirements. A participant is defined in terms of age, school status, membership in a disadvantaged youth population; and all of this must be verified with documentation prior to services and resources funded by your project. So in other words, you must ensure that these participants are eligible. If not, we could question all the costs associated with those participants.

Lack of proper procurement. Services and goods must be properly procured and they must be procured competitively. And if you do sole-source, you must have documentation available to show that the services were sole-sourced. And you must follow your own internal procurement policies.

So we're going to talk about design and governance. Worksites not incorporated into the statement of work. The funding opportunity announcement, it requires grantees to complete and submit and receive approval of ETA 9130 worksite for each site, prior to performing any operations on the site. And the approved site must be incorporated into your statement of work. So if you do not have an approved worksite and YouthBuild funds are expended on that site, again, we could question all those costs associated with that bill.

Failure to record restrictive covenant for properties constructed using YouthBuild funds. This is a frequent finding. All properties rehabilitated or constructed using DOL grant – YouthBuild grant funds do require a restrictive covenant clause included in the deed of the properties. This is to ensure that for a period of at least five years, all residential housing that is constructed or rehabilitated with DOL YouthBuild funds be rented or sold to low-income or homeless individuals or families.

Next is the lack of veteran priority of services policy. The Jobs for Veterans Act requires recipients of DOL funds to provide priority of service to veterans and spouses of certain veterans for the recipient of employment training and placement services in any job training program. They must develop and implement a policy that promotes and markets the services to veterans, and provide priority of services to veterans and their spouses.

In order for veterans to be eligible to get these services, they must be eligible to receive these services. For example, if the FPO is doing a monitoring review and you don't have a veterans priority of service policy, that could lead to other questions as to, OK, are you marketing to veterans and have you been providing services to veterans? So if you don't have a policy available, it could lead to additional questions.

Missing policies, procedures explaining how wages and stipends are paid. OK. Stipends and wages incentives provided on the YouthBuild grants must be in line with your internal policies and procedures. And the payments to youth can be made into formal wages and stipends. But you must maintain documentation on how the amount of the stipend was set and the circumstances under which the stipends will be provided.

OK. Serving participants outside target areas without approved documentation. Grantees must ensure that you're getting grant officer approval before serving participants that are outside your target areas, as outlined in your grant agreement.

Next I'll turn it over to Adrian.

ADRIAN BARRETT: Good afternoon, everyone. Hopefully you can hear me.

OK. We're going to go over some common problem areas that we see out on the road. And I pulled these out of the Core Monitoring Guide, which actually is – I saw one of the questions about the current – whether the guide was current. And it's being updated and it'll come out as soon as it's ready. So the guide that you have, which should be from 2005, is actually the current guide.

OK. We'll start out with objective 2.5, which is match requirements. And sometimes on the road we'll see that people don't have written policies for – methods for tracking match and leverage resources. And that's problematic. You should have a policy and whoever's donating the match should have an agreement with that organization and it should be objectively quantifiable.

Then we have objective 3.1, which is budget controls and not having an approved budget to compare to actual expenditures. One of the questions that I'll ask to a project manager or to a financial person is I'll ask them to tell me where they are year-to-date as far as funding is concerned. And that gives me sort of a good indication as to whether or not that organization is managing funds well, and they're aware of the expenses that they're accruing at any given time.

Then you have objective 3.2, cash management, not having procedures for knowing how and when to draw down cash. That's important. And as you know, we operate our grants on an accrual system. And sometimes one of the pitfalls of not keeping accurate measure of the cash that you're drawing down is that you'll sometimes – you'll get a letter or a call from us letting you know that you have too much cash on hand, for example.

Then you have objective 3.4, cost allocation. This is an important one, because in a lot of organizations you may have an employee who's wearing several hats and they're not allocating their time. This is normally done in the form of a time sheet and it's really important, because what'll happen is, for example, I've seen instances where you have a program manager who is working on maybe two or three different grants. And then when you check the file, you see that there's a salary allotment in personnel that says 100 percent of time in each grant. And as we know, that's mathematically impossible; that can't happen.

OK. And under that area also, William also mentioned indirect cost rate. That's an important thing also. You should always – you should make sure that your rate is current and you just submit it – it has to be incorporated into the grant file modification. And one of the things there is that – so you – in some grants, the amount of indirect cost is actually quite sizable.

And some people erroneously think that that money is available to be transferred to other areas sort of at will. That's actually not the case. And if you don't make preparations and have your rate in effect, and if you are going to try to sort of decrease or increase that rate, if you don't do that by modification on time, then you might forfeit those funds and they'd be returned to the Treasury, potentially. And we don't want that.

OK. We'll move on to objective 3.5, which is allowable costs. A good way to look at the allowable costs is to look at your terms and conditions or your actual grant agreement. Most of the really, really important and key OMB circular and regulations points will be in those instructions. And you'll be able to refer to those and use that as a guide, as a roadmap, to see the key provisions that you need to be aware of.

Also, you can go to grants.gov online or just do a general Google search and there's a lot of information out there on both the uniform guidance and also the old rules. And you can – obviously, you can go to DOL's website, call your FPO, and we'll direct you to those resources online.

OK. This is a list of some of the documents that you can expect to see at the end of the grant, during the closeout cycle. This is a good reference slide. So you'll be getting this information with the closeout department and they will basically give you more detail on this when it comes up at the end of the grant. So I won't bore you by reading all of those.

OK. So during closeout, all documents are going to be due within 90 days. DOL is going to do a financial analysis and that's where we're going to work on all the unresolved details regarding performance and regarding financial charges or – and other details, things of that nature.

If there are unresolved financial issues, sometimes they can be resolved through some sort of modification in the closeout period. But it's risky to wait to resolve financial situations until then because, if they're not approved, then you might be stuck with a disallowed cost, which basically means that you're going to be cutting a check to DOL. And we don't want that.

So at the end of that 90-day period, et cetera, the grant will be closed out and one of two things will happen. Everything will be resolved and we part ways until the next grant opportunity, or it might be that there's some issues that need to be resolved. Maybe your project owes the federal government money, or vice versa.

Thanks. I'm now going to hand it over to Antonio.

ANTONIO MCKOY: Thanks, Adrian. And good afternoon, everyone. So before we wrap up today's webinar, let's briefly talk about some best practices for documentation.

I like to look at the documentation process in three stages: before participant enrollment, after participant enrollment, and during participant follow-up.

So when considering best practices for documentation before participant enrollment, the first tip is consider creating temporary applicant files to collect participant eligibility documentation. Coupling this with the next step, utilizing the checklist of required eligibility documentation, will allow you to keep track of what information you have to support participant eligibility and what information is still outstanding prior to participant enrollment.

Next, be sure to gather and verify all eligibility documentation prior to mental toughness. Doing this will allow you to know that everyone in your mental toughness cycle is eligible for enrollment, and prevents the need to chase down documentation during the busy period between running your mental toughness section, selecting participants, and ultimately enrolling them into your program.

You may also want to consider having applicants sign a release form that allows you to contact third parties who can more readily provide eligibility documentation on their behalf. Doing this can possibly reduce the amount of time and effort needed to track down the documentation.

And one example of this actually comes from when I was a YouthBuild grantee myself. I actually partnered with my local school district and they would provide me with documentation regarding an applicant's dropout status, as long as we could provide them with a signed release form. So each recruitment cycle we would send our list of applicants to the school district, along with their signed release forms, and then they would provide us with the necessary documentation to confirm applicant dropout status.

So now, your once-applicants are now new participants that you've enrolled into your program. During this time, you should consider maintaining a physical copy of all assessments and certifications in the participant case file. As we already heard, if it's not documented, it doesn't exist. This is particularly true for information in your participant case files, and especially those items directly connected to your performance measures. If it's something that you're going to report on, get in the habit of maintaining some type of documentation, preferably a physical copy, in the participant's case file.

This goes for documenting the stipends, wages, and other supportive services provided to your participants as well. All transfer of funds and/or supportive service benefits should be tracked and documented. This includes, but is not limited to, providing participants items such as bus passes and tokens, incentives, needs-based assistance, payroll checks, and/or weekly stipends.

So now your participants have exited your program and are now in follow-up. Documentation during follow-up is particularly tricky because your former participants are no longer coming to your program on a daily basis, so your contact becomes less regular as before during enrollment. But you still have important information to report on and document regarding their efforts after your program.

Follow-up, and particularly your ability to document grant follow-up, begins with an item that's not listed here, and that's the culture you create for your program starting on day one. As I'm sure many of you have heard, participant placement starts day one. Well, I would amend that and add that documentation of participant placement also starts on day one. Creating a strong program culture will allow your participant to see the importance of them providing documentation of their follow-up activities to you, and hopefully reduce your need to chase and hunt down the information.

Another tip is to provide incentives to your participants for coming in and providing placement documentation during their follow-up. You may also want to consider, prior to exit, having your participants sign a release form allowing you to contact third parties during follow-up to provide placement documentation on their behalf. I know several programs that utilize this to reach out to employers and community colleges to verify and document participant placement during follow-up.

And with that said, I'll turn it back over to Toni Wilson.

MS. WILSON: Thank you so much, Antonio. And thank you so much to all of our presenters for such good information in reference to our guidance, and specifically drilling down into our documentation.

We'd like to open it up to Q&A. So just a reminder, if you have not already, to please enter your – any questions that you have in our chat box. We do have a lot of specific questions, so I will just start out by reminding everyone, if you have specific documentation questions, it's still best to talk with your federal project officer. They can really drill down to your specific situation and what it is that you're looking for. So just want to kind of put that out there.

But we are going to go over in our last 10 minutes here some of the questions that we received.

So our first question is, "Are there plans to develop a June 15th or the other vocational tracks in the Construction Plus model?"

MS. SMITH: TEGL 6-15.

MS. WILSON: I'm sorry.

MS. SMITH: Yeah.

MS. WILSON: So for TEGL – so are there plans to develop another TEGL for the Construction Plus model, is basically what the question is.

MS. SMITH: Yeah. And I know who asked that, David Klaus (ph). And that is a great question, actually. And yes, there is something that we are – I don't know exactly what form it will take, but I will assure you that one of the things we are really focused on now that we have five years' worth of grantees who have started doing Construction Plus, we really are focused on developing sort of a framework for what Construction Plus looks like, how to do it well, and what sort of components of it should be, so that we can provide more detailed guidance around the Construction Plus component.

I know that's something that FPOs certainly would find helpful, but also grantees. So I can't tell you exactly when that's going to come, but we're doing all this sort of background analysis and thought process around that, and we do hope to have some sort of TEGL or TEN related to Construction Plus in more detail at some point in the future.

MS. WILSON: All right. Our next question is a specific question around infrastructure costs. If they were not included in the budget, but now with the One-Stop is negotiation shared costs? Where does this cost come from? Can it be considered part of our indirect cost?

For a question – this is an example of a very kind of specific question to your budget, and so we ask that you work with your FPO in reference to working that out. So that's a good example of that one.

Our next question is, "Can you give some examples in reference to a partnership with One-Stops, what that could look like?" So with that, as Jenn had mentioned in her presentation, more guidance is coming. So you'll see some examples around that. I would –

MS. SMITH: Yeah. We're gathering information on that. I think I would certainly recommend that you ask your federal project officer; they know examples. As I mentioned, those MOUs are still being developed. But again, I would also say, this is a perfect time for you to look at that TEGL 44-07, because hopefully that is a place where you will see what some of those examples look like.

And yes, I understand that was before we were talking about required partnerships. But again, I think the idea is maybe it can give you some good understanding of where One-Stops can be a beneficial partner. I think one thing I mentioned is sort of like information sharing around outcomes and eligibility; it's certainly one component of it. But in terms of what a robust One-Stop partnership looks like, I think that you will see future guidance coming related to that.

MS. WILSON: Thank you so much, Jenn. Our next question is, "Would an IEP from the last school attended count as documentation for disability?"

MS. SMITH: Yes. That's exactly right. We mentioned that administrative records are part of what can – part of how you can document a youth with disability. And that means school administrative records, such as IEP. Absolutely.

MS. WILSON: Next question is, "Can you provide an example of self-attestation document?"

MS. SMITH: So self-attestation is – there are really just two key components to what self-attestation has to include. And basically, it's something that the grantee can write up that says, this youth – and then a line where you put in their name – is self-attesting that such-and-such is true, whatever that particular self-attestation requirement is. And then the other component is that the youth has to sign and date it. That's really what you're looking for is a verified signature that they are telling you that it's a truthful statement.

And as I was just reminded, I would also say that we do have examples of self-attestation documents on our community of practice, which when we get to the resources slide you will see that the YouthBuild community of practice is one of the links. So you should definitely – for some of the questions you guys have around what are good examples of things, a perfect place to look is our community of practice, because we really try to pull together good resources and examples of some of the stuff from you guys over the years. So definitely also check there.

MS. WILSON: All right. Good point, Jenn. Our next question is, "Can you use tax returns for income?"

MS. SMITH: The answer there is yes. Tax returns are one good way to document income.

MS. WILSON: Our next one is, "What about high school dropout, out-of-school youth eligibility documentation?"

MS. SMITH: Yes. This is an excellent point. Somebody called my bluff and I have to admit that I'm incredibly embarrassed. I apologize. I was working on these slides and somehow I skipped straight over high school documentation, which is obviously a very key component of what we document.

Now again, I mentioned earlier that we will be having hopefully an updated YouthBuild documentation guidance that comes out once the WIOA document does. Sort of our own companion to it. And I think that, because with WIOA there is now that extension to the dropout requirement which is that it's a dropout or somebody who was a dropout and subsequently re-enrolled. So we will probably be providing more documentation of that.

But I will tell you that in general things that would qualify for school dropout are a school attendance record, a letter or documentation from the school stating that the youth has dropped out, or again self-attestation. That is one of those areas that we do allow for self-attestation.

I am surprised that there are certainly some grantees who have no problem getting from the school that letter. But we also know there are instances where they would talk to school and the schools are not going to acknowledge that a youth has dropped out. And so sometimes self-attestation may be the only route to go.

MS. WILSON: All right. Thank you. Is there more – our next question is, "Is more than one paystub in the same quarter required to verify employment?"

MS. SMITH: Yes. I believe the guidance here is that you need at least two paystubs.

MS. WILSON: Our next question is, "How do we document students who are homeless?"

MS. SMITH: Yeah. So that's interesting. That's a good question because we've gotten a couple of those – similar questions to that in the questions that we're going to go through. And the one thing I want to remind you of is that what we're really talking about is what is required documentation because it's a requirement for whom you serve and the outcomes that you achieve.

Homelessness is not an eligibility criterion. So we don't provide guidance on how you document that a youth is homeless. I would figure that probably self-attestation is one way to do it. If the issue of homelessness is a factor around income verification, on the slide around income verification we did document something – I think self-attestation or other areas that might relate to how you would document low income for a youth who's homeless.

But you do not need to provide documentation that a youth is homeless because that does not relate to any of our eligibility criteria.

MS. WILSON: OK. Our next question is, "Are applicants with sexual offenses – or sexual offenders – permitted?"

MS. SMITH: Yeah. And that's an interesting question. We do not have a policy on that. I think that – there's nothing that completely precludes it. I would think that would be something that you would have to consider on a program by program basis. You'd want to have very clear guidance on how you would address that issue.

And you'd have to see if there were any legal issues that would prevent you from serving that youth. Such as if you're in a school setting and this sexual offender has a requirement that they have to be at least 100 feet from a school or – you need to think through those policy things of whether a sexual offender could actually be served by your program based on the location of your program, based on the youth that you serve. Because again, many of our YouthBuild program serve youth under the age of 18.

There are a lot of factors there and you would have to just make sure that it would be legal if you chose to go that route. And you would want to make sure that you were really clear on how you would address that and make sure that your other participants and your staff were safe.

MS. WILSON: OK. Our next question, "Are we to accept copies of documentation, such as birth certificates, Social Security cards, et cetera?"

MS. SMITH: I mean, yes. I think to the degree that you can get them. But I actually think this would be a great one to ask the federal project officers. When you guys go out on a site visit and you're doing the monitoring, what sort of documentation do you often see as eligible documentation in the case records? Does any of the four of you want to jump on this one?

MR. BARRETT: Yeah. I'll contribute. You'll see birth certificates, some Social Security documentation, any kind of – the normal kinds of ID. Help me out, people, and jump in.

MS. SMITH: Yeah. Well, I think –

MR. MITCHELL: This is William. I see driver's license; I see birth certificates and Social Security cards also. The only thing I would caution is transmitting those records with that information in them.

MS. SMITH: Yeah. And that's an excellent point I was going to jump on there, William. I mean, I think the other thing that you guys have to recognize is what the requirements are around record keeping and protecting those. They should be in locked files. You need to be very clear about the chain of command for who has access to that, and making sure that you are actually protecting them. You do have a responsibility for protecting the PII data that is in your hands. So certainly keep that in mind.

MS. WILSON: Our next question is, "Needing some clarity on the process of obtaining proof of SSI and public (assistance ?) records."

MS. SMITH: So again, I would put this one in the same category as what I mentioned about homeless youth. Again, we do a lot of our – a lot of our MIS has a case management component, which means that it allows for a lot of additional information that you guys may find helpful to know about the youth that you're serving, but are not necessarily eligibility requirements. And certainly being on food stamps or SNAP, that is – SSI – those are not per se eligibility requirements.

Again, if it's about documenting low-income status, we did provide information on the ways that you would do that. But you do not have to document that somebody is on food stamps because it's not tied to any of our required eligibility or outcomes.

MS. WILSON: Which is related to our next question, which is, "What documentation is required for SNAP, food stamps, and assistance?" So Jenn just –

Our next question is actually just a reminder. Selective service registration verification has its own TEGL and that should be – we need to mention that as a reference.

MS. SMITH: Yeah. So that is TEGL 11-11. And there are actually a couple of changes with that one. I mentioned earlier that as these TEGLs get updates, sometimes there are changes. So probably the most relevant one is TEGL 11-11 change two, and that is "Selective Service Registration Requirements for Employment and Training Administration Funded Programs." That is another very good and, actually, YouthBuild-relevant TEGL that we should have highlighted. So thank you, Darren (sp), for bringing that up.

MS. WILSON: All right. Our next question is, "We know that drug testing is an allowable cost under mental toughness. In the webinar, it was mentioned to get all documentation prior to mental toughness. Does that go for the drug testing too?"

MS. SMITH: I don't know if one of the FPOs wants to weigh in on this in terms of their opinion. What I would say about that is I'm not sure what's being referenced there specifically. But I mean, the point at which you have to have documentation is the point at which you enroll youth. Prior to mental – unless you're doing mental toughness after enrollment, the point at which you need to have the documentation and know that this youth is eligible is the point at which you're going to enroll them.

I will tell you that what some programs do for mental toughness is actually make part of mental toughness sort of a challenge for the youth to go and collect all that information. Some of the youth that you guys are serving do not always have easy access to all of their – the data they might need to prove and verify their eligibility and other things. So sometimes I know some programs have used that as sort of a challenge, where they kind of – part of the mental toughness is having the youth go out and figure out how to go to the courthouse and retrieve a birth certificate record, or go to the hospital or – et cetera. So that's one way to consider that.

So yeah. I think – I know we're a little bit over time now, so –

MS. WILSON: (Inaudible.) We're going to actually just go to the last question that we have for the day. And I would remind people they can still always go to our community of practice. We have a discussion area if you have additional questions. You can note that and we can kind of go from there.

So actually, we've already covered all of our questions, so no more in reference to – based on time. So sorry about that.

So I'd like to – thank you so much, Adrian, Doug, Antonio, William, and Jenn for this presentation. This is really good information. There will be an archive, so you'll be able to look back and kind of go over the questions you have.

But there's some quick resources. The YouthBuild toolbox, encourage you to look at that information. There's information around documentation, in addition to all information around TEGLs that were mentioned. Workforce GPS; once again, please go on there and, like I said, you can always continue the discussion on the discussion page of GPS. And then all of our resources are found there under the resource section.

And then all of our DOL guidance, you can locate that there. That's all of our TEGLs and TENs and any other guidance related. So encourage you to go there.

And then all of our speaker contact information. But as a reminder, for these specific questions please stay in contact with your FPO; they can really help guide you and really look at what you do have and what will keep you in compliance. So I would encourage you to do that. But you can also reach out to us if you have any questions.

And with that said, just a reminder to save the date. Our next YouthBuild webinar, which hopefully we will end on time, is the "Construction and Youth Leadership," which will be held on April 4th. And so that'll be a really good one and you will receive information for registering. So look out for that.

All right. Thank you, everybody. And have a great afternoon.

(END)