**WorkforceGPS**

**Transcript of Webinar**

**H-1B Ready to Work All Group Coaching: Programmatic Grant Closeout**

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GRACE MCCALL: And welcome to "H-1B Ready to Work Programmatic and Federal Grant Closeout" webinar. And without further ado, I'd like to turn things over to our moderator today, Danielle Kittrell, workforce analyst, U.S. Department of Labor, Employment and Training Administration. Danielle?

DANIELLE KITTRELL: Thank you so much, Grace and good afternoon, everybody. And now that we have a better idea of who has joined us this afternoon, I'd like to officially welcome you to the H-1B Ready to Work Webinar on Programmatic and Federal Grant Closeout. Again, I am Danielle Kittrell. I am a workforce analyst here at the program office at the national department of labor and I'll be moderating today's webinar.

Your presenters. So I am very, very happy to introduce Mr. Avery Malone and Kisha Toppin. Avery Malone is a resolution specialist here at DOL and he started working with ETA as a contractor in 2000. He then went on to become a full-time employee in 2006. He has worked in several capacities of the grant world from closeout – (inaudible) – onto the operational side as a temporary detail.

Most recently, Avery had the opportunity to take part in a president's management council team – (inaudible) – station on detail as a PNC detail lead. Avery spent six months at the Office of Personnel Management gaining experience working at the Chief Human Capital Office of Council. I'm also happy to introduce Ms. Kisha Toppin, your Ready to Work TA coach with High Impact Partners, also known as HIP.

Now, you are facilitators. I am also joined by my colleague, Ms. Akeelah Harrell, your Ready to Work TA lead here at the national office, Ms. Erika Humphrey, another veteran TA coach for High Impact Partners and of course, Mr. Lyle Neumann, your TA coach for Performance Excellence Partners. Please know that Erika and Lyle, they may not be presenting, but they will be ready and available on today's call to answer your questions.

Now, we have a polling question for you and it's simple, what is your role in the Ready to Work Grant? Are you an authorized rep, are you a program director, are you a performance specialist, IT professional or something else? Let us know. OK. Authorized rep, something else, IT professional. Excellent. Well, thank you so much, everyone and again, welcome. So now, I'd like to turn it over to my colleague, Ms. Akeelah Harrell.

Akeelah Harrell: Thank you, Danielle. By now, each grantee has developed a realistic plan for finishing strong that defines roles, responsibilities, timelines and communication strategy.

Today's webinar, we'll call it the practical and substantive information for programmatic and federal grant closeout, as our main objective is to support you throughout the period of performance extension. Programmatic closeout checklist, winding down your program. And now I'm going to hand it off to Kisha.

MS. MCCALL: Kisha, we can't hear you right now. Remember to unmute yourself.

KISHA TOPPIN: Thank you, Akeelah for the – (inaudible) – and sorry about that, I did need to unmute. Welcome to today's webinar. Again, I'm Kisha Toppin and I'll be taking the first part of this webinar just to talk about a programmatic closeout checklist, winding down your program. And I want to mention that the items I'm about to review are actually pulled from a few different sources.

If you will refer to the file pod, first – (inaudible) – the Ready to Work Grant wrap-up checklist and also the Ready to Work staff transitions tip sheet. So this information actually was shared with Ready to Work grantees back in October and July, 2018 as well as during our D.C. convening earlier in 2018.

And so we wanted to kick off the webinar and just put some things before you to be thinking about, but I, again, too, this is not the first time – (inaudible) – about it, but we wanted to make sure and bring it up prior to bringing on Mr. Avery. So having said that, I want to go ahead and move onto the first slide on staffing. Now, this is part of the checklist again.

So first, regarding staffing, make a determination regarding the key positions needed to close out the clients and the grant and many of you are well into this item as well as the other ones. So we wanted to put it before you and remind you. Also, it's important to conduct audits more frequently now to ensure the collection of program data.

As you know, as time goes on, more and more data is coming in. So it's important to stay on top of collecting the data and reporting it in a timely fashion. Lastly, overlap any in-house rules in preparation for positions potentially becoming vacant. Now, I bet if I were to unmute the phones you all could probably attest to this sort of things already taking place.

I have a grantee that I work with, – (inaudible) – grantee, and the actual – the program directors lab is Friday. Their period of performance extension ends this month, but they have already in place two staff people remaining at the organization who are prepared to jump right in and take over and take reporting of the grant home to the end.

So we want you to be thinking about that. Next, participant services. We want you to be thinking about these items. Determine how many individuals can still be served and the last day new participants can be enrolled into the program.

Now, I assume that that aspect of programming is probably coming to a close given their – again, about seven months out, but doing this also based on the availability of – (inaudible) – and the length of the training you offer as well as the cost of the training, looking at that against your budget. Secondly, create a plan to inform current participants about the end of the Ready to Work program.

Now, I would appreciate it if anyone is doing this already, please indicate in the chat box how you are informing current participants and also develop a transition plan to other programs for serving currently enrolled participants after Ready to Work has ended. So again, if you are either creating a plan or informing current participants about the grant ending as well as referring them to other programs or have plans to do so, go ahead and tell us about it in the chat.

Lastly, we want you to provide participants with resource information to access supportive services and other helpful information that they – (inaudible) – access to once you are no longer available to them because the grant has ended. I want to pause here and just acknowledge my two team members, Lyle Neumann and Erika Humphrey.

If you will – if there's anything that I missed, if you want to jump in and add anything to what I've already shared.

ERIKA HUMPHREY: Yeah. Hi. This is Erika. I just wanted to share that Casey from Worksystems shares that career coaches are utilizing the end of the program as a motivator for job seekers to find work and that's great, Casey, because that's going to be really key, because that's one of the things that I was going to jump into is that even though individuals have finished training, if you're still having trouble get ahold of them, making sure that you have a plan in place as well as now that several of your team members are leaving just really think about what's that plan in place to make sure that you hold onto those participants so that if they do get a job, they can still be counted.

So if that's the end of the program workshop with alumni sharing about all the great things that have happened, that would be a great way to bring people in and that way you can find out, did you get a job or not?

MS. TOPPIN: Absolutely, Erika. And Casey, thank you for offering that, because oftentimes, it's hard to put a positive spin on a program – (inaudible) –, but if you can get participants to just be thinking about, we're almost at the finish line, literally going to help ourselves get jobs is a good way to pose it to them. All right. Thank you, Erika.

Moving onto the next slide about partnerships. Decide when and how to share your plan and timelines to the end of the Ready to Work program, including the end of the new participant enrollment. Secondly, determine who will be informed at the partner agencies and who, from your program staff, will provide that information. So really closing the loop to say, we're going to let our partners know the program is ending.

Actually, they should know by now. They should know from day one when the grant ends; right? But just circling back to make sure all the loops are closed are closed and that that information has been communicated appropriately and in a timely fashion. Thirdly, consider the need or options for any new agreements for Ready to Work participant follow-up activities.

And lastly regarding partnerships, gauge the level of commitment of each employer partner to continue the work beyond the grant and I think this also begins to dive into the suitability conversation; right? But we also want to make sure that you all are staying connected to employers and finding out how they can, again, continue the work that was started with this grant. Lyle, do you have anything to add to that regarding partnerships?

LYLE NEUMANN: No. I don't on partnerships, but a quick comment back on the first slide on staffing and I'm sure this will be covered later in the program, but it's important to note that when your grant ends, you still have a final closeout package to present and oftentimes, that could be a month, two months, even three months after the program ends. You have to make sure that you still have staff in place to take care of that final closeout.

MS. TOPPIN: Absolutely. Thank you, Lyle. And I'm going to go ahead and advance our slides to ask anyone so far does anyone have questions? I see some folks typing. Perhaps Jeannette is asking a question. I'm going to go ahead and continue and I will come back, just have another small segment on performance reporting.

So all Ready to Work grantees are required to submit a final quarterly performance narrative and financial report which are due no later than 45 days after the end of the last quarter of grant activities. I'm sure you will hear more about this in detail a little later. Grantees can submit final quarterly performance narratives and financial reports as early as the day after the grant ends.

And what a great way and a great strategy to get everything in on time. Also, be sure that the performance and narrative reports you are submitting in the HUB includes the following information, quarterly and cumulative information on grant activities, a summary of project activities, employment outcomes and other deliverables and related results of the project.

Thirdly, a thorough documentation of the training or labor market information approaches used by the grantee. Think about how you want to articulate how you use labor market information to plan through the training you provided. So that's a little feedback for you as you're writing that in the narrative. And also, participant records to support the aggregate data submitted.

What would be so awesome to really take it home – this grant home in a successful way is to perhaps submit some success stories along with that report. Program sustainability. And we actually spent some time on this at the DC convening also in early 2018. Identify services, procedures, activities and partnerships that will continue after the grant ends.

And I think over the course of the last three or four years, we've talked about this as a TA team and kept it in front of you and you all can probably speak to what you've done. Feel free, as I'm continuing this slide, to speak to any of that that you've identified about your programs that will continue after the grant ends. Secondly, it's important to meet with core partners to review and receive approval of plans for continuation or termination of Ready to Work activities.

So being real clear about that is important. And lastly, in addition to looking for new funding from federal or foundation sources, you might want to consider alternative revenue development strategies and there's more detail about this here.

What I'd like to highlight is that some of the partner agencies you may determine that during the course of the Ready to Work Grant, you are both able to provide the same type of service, but maybe one was better at it or more effective or had a greater completion rate. That's the type of conversation you might want to have as you're looking at ways to leverage other funding opportunities in the future.

And Erika, I was going to pause here and see what Jeannette offered in the chat. Let's see, "Our grant ends on 9/30. And so at – on June 30th, they're planning to check to see if they should enroll – end enrollment then. All current participants will be transitioned into WIOA at the end of the close. We're also looking at whether we can add more non-long-term employments in the grant."

OK. Thank you for that feedback. It certainly is a good idea to end enrollment and give time to really focus on the training and the employment placement aspect of service delivery. And so when you have the later enrollments, I think it's like a mad-dash to get people into training and completed and into a job and to get the credential.

So Jeanette, I think that's a good strategy to cease enrollment in June if you are where you want to be. Some others are chiming in. This is my last slide before I get out of the way for Avery. Leaving your legacy and developing your program's success story. I mentioned talking about this in your final quarterly narrative report. Present your participant successes, performance data and community impact also to the groups your project serves and those in positions to help support your work.

Policymakers and stakeholders want to know a problem your program addressed and you will have the data to back it up. And what a great way and a great time to pull all that together to put into your organization's arsenal to always have and to use for future funding opportunities. Here's the link below on how to develop an effective program story. Please check that out.

Thanks, Akeelah. You added about including all questions within the chat. Casey is asking, "We can still add employments in the 45 days after the grant ends; is that correct?" And Danielle, you're answering that. Danielle, do you want to speak to it live?

MS. KITTRELL: Yeah. Thanks, Casey and thank you, Kisha for the question. So no, once the grant ends, Casey, you don't want to do any more enrollments. So that 45 days you should be focusing more on closeout, not enrollments.

MS. TOPPIN: Well, she asked about – she was asking, Danielle, about employment, looks like, and placements and I wanted to clarify, also, Casey, are you asking entering it into the system or are you saying actual employment placements?

MS. KITTRELL: Yeah. Is that what you mean employment placement? – (inaudible) – employment – (inaudible) –. Casey, I'll tell you what, we can continue this conversation offline.

MS. TOPPIN: All right. Thank you, Ms. Danielle. Jeannette has chimed in. "I believe that all activities must be completed by the end of the grant, including placements." And others are chiming in. Multiple people are asking questions, which is great. Thank you for providing that contact information, Danielle. And she's saying you'll capture the long-term measures.

I think we can certainly come back to this, if need be, after we hear from Mr. Avery Malone who is the resolution specialist for U.S. Department of Labor. Avery, we've been waiting for you. We can hear all that you have to share with us. (Inaudible) – over to you, sir. Here you go.

AVERY MALONE: Thank you very much for that introduction. After I'm done with this presentation, we'll see if you still hold onto that feeling. Again, I'd like to thank all of the participants that have called in today to join us.

I'd like to thank Danielle for presenting us with the opportunity to speak with the Ready to Work participants and hopefully in the process, provide them with some clarity regarding the closeout process to help them navigate the transition from the operations work they're doing to wrapping up their grant award. I'll give an overall view of closeout and what we do, what we are looking for.

Also, what you, as the grant recipient, need to be aware of in my – (inaudible) – in your closeout document submissions. I'll do my best to present it in a way where whether you're first-time presenting – I mean, first-time closing or if you've closed out with us prior, that you are comfortable with our expectations. And what I like to always impress upon everyone that we provide this presentation to is as you are submitting your questions, communication is very key.

We are a phone call away, an email away and again, it's always better to ask questions for clarity so that we can do our best to avoid any unfortunate hiccups, heartburns or frustration. I appreciate Kisha's introduction and something she touched on about how are you preparing and I like to think about what my mother always said to me, to get on top of your stuff before it gets on top of you.

So hopefully we will provide you with enough information that you will go about it in a manner to be on top of everything before you get to closeout and are hit with something that you were unaware of. So finishing strong, again, my mother says, sought out the way you want to end up and we believe that you probably started out very strong.

We hear the coaches that you've been surrounded with, the technical assistance that you've been getting. So we're sure that you've been properly prepared and we want to do likewise for closeout. So with that being said, the grant closeout process, next slide. So what is grant closeout?

It's the federal awarding agency's way of determining that all applicable administrative requirements or actions in all required work of the federal award have been completed by the non-federal entity, which is your organization. The short of that end is the end of the grant lifecycle. So everything that hasn't been getting must have an end.

It gives the government an opportunity to gauge our success or effectiveness with awarding funds to help our public training and it also gives us a way to gauge how well you have administered those award funds during the process of grant activity. So the long and short is the end of the grant lifecycle. It declares the official end of the government's relationship with the grantee.

Everything that we do with closeout has some sort of authority behind it. So whether it is a statutory requirement that has been issued through public laws produced from Congress, whether it's something that has been codified in our federal regulations or if it's something that is actually in the contract that you signed for the grant award in the terms and conditions of the award.

Everything we do lines up with statutory or regulatory or a term of condition requirement. So for closeout purposes, most of our regulatory requirements you can find under the Uniform Guidance, which has been codified under 2 Code of Federal Regulations, 2 CFR 200.343, 2 CFR 200.344, which is post-closeout adjustments and 2 CFR 200.345, collections of any amounts due and lastly, but not least 2 CFR 2900 Subpart D, which references some exceptions to the rule.

Next slide, please. So who we are, on behalf of the Department of Labor, Employment and Training Administration, we are the office of branch management. We are under the leadership of Latonya Torrence. She is the division chief for DPRR, which is the Division of Policy, Review and Resolution.

There are three units under this division, our policy unit, which is headed up by Debbie Strama and they provide us the necessary guidance with regards to any policy explanations or activities with how our grants are administered. We have our audit unit, which is under the guidance of Ana Mulero.

They handle all of the audit resolution items that come into our office as well as monitoring review issues that may come up or closeout determination issues that may arise at the point of closeout. The closeout unit is headed up by Muran Saffa (sp), who is the supervisor. She is joining us today as well. There are seven resolution specialists in our office and we have a combined amount of maybe 40 or 50 years of experience with closeout.

And again, I assist Muran as a resolution specialist and a grant officer in a capacity to help her in whatever form, shape or what I can do possible. Next slide, please. So how we prepare for closeout, we'll give you a little background of how we prepare and hopefully it'll give you some understanding of what you need to prepare.

So we close out annually anywhere from 700 to 1,000, sometimes over 1,000 grant awards and we have to be very systematic with our approach in order to ensure that we reach and attain all of our goals and all the requirements of our grant closeout. One of the ways we do this is by anticipating our workload, we project for a year out, we run reports to identify all grant awards that are fast approaching their period of performance end date.

We then take that information and go into our electronic grant closeout system to compare and confirm that there haven't been any period of performance extensions awarded and we proceed to assign any cases that will be proceeding with closeout to our resolution specialists.

So I will direct you to the very bottom of this particular slide, which is not less than seven days prior to the period of performance end date closeout specialist sends out initial notification letter to grant recipients. You should receive a closeout notification no later than seven days prior to your period of performance end date. Occasionally, they will go out prior to this. You may receive one anywhere from up to 30 days in advance.

It's just a notification to inform you that your closeout is in the process and your period of performance end date is fast approaching. Next slide. Closeout begins. When does closeout begin? For your grant recipient, your closeout begins the very next day after your period of performance end date.

One of the first actions that you will be required to perform as part of the process is the submission of your final quarterly 9130, which is supposed to be submitted 45 days after the period of performance end date. How do we know that it's your final quarterly 9130? Because you would have checked in box number six the radio button that says yes, this is a final report.

Somewhere between two and a half months from the period of performance end date, you will receive a follow-up email from your closeout resolution specialist just reminding you that your closeout submission due date is fast approaching.

So at this point, you may have received two or three notifications from your closeout specialist and again, it's just to help you stay on task with the approaching due dates so that nothing falls off the radar and you don't have to worry about being dinged for being late in your submission. Now, on the 90th calendar day, you should've submitted all of your closeout financial report – well, all of your closeout reports.

So that's everything that's related to closing out this grant award. You can find this requirement under the 2 CFR 200.343 and again, your closeout resolution specialist is familiar with all the documentation that will be required based on your type of award and will guide you in this process.

Now, I'm not sure if this has anything to do with – that was asked just a minute ago, but a reminder to all grant recipients you may not direct charge any staff time to work on the closeout of your grant after the period of performance end date. All ETA grant awards are on an accrual basis and you can only accrue expenditures within the period of performance.

So just keep that in mind. Next slide, please. Day 91, so if we have been successful in guiding you through this process and you have submitted all of the required closeout documents, your closeout specialist will not begin their review of all that you have submitted. They're going to ensure compliance with any administrative requirements, any regulatory requirements or any requirements in the terms and conditions of your award.

They will also ensure that a financial reconciliation has been done to ensure that you have drawn down all funds that you are entitled to based on allowable and allocable expenditures under the grant award. Now, according to the Department of Labor Management Series 2 Chapter 800, the closeout unit is required to submit – or is required to complete our closeouts within one year of the grant award expiration.

Under our new Uniform Guidance, all awards must be closed within one year of receipt and acceptance of all required final reports. So in order to ensure that we are closing out our awards within the year timeframe, it has now been incorporated into the Uniform Guidance as a must and in order to do that, we need to make sure that you have submitted all of your documentation in a timely fashion.

Now, again, I will point you to the bottom of this slide and if you have not heard about it, there is a congressional act that has been passed in 2016 entitled the GONE Act. It's the Grant Oversight and New Efficiency Act, Public Law 114-117. Because of past experiences where some agencies have had a hard time closing out their grant award, Congress would like to understand and have a better understanding of what is holding up the closeout award.

Now, a year sounds like a long time, but things can happen that will delay the process of closure. Due to that, Congress said any report – or any awards that you have that have not closed two years after the period of performance has lapsed, they want more information.

So we're hoping to avoid having to place your organization's name on a list that we have to report to Congress and again, the best way to do that is to ensure communication and follow through on the instructions given to you by your resolution specialist. Next slide. Closeout deadline, so in this particular slide, just to give you an example if your grant award was to close on September 30, 2019, your closeout begins the very next day.

Now, 45 days after the grant has expired, you would – are required to submit your final quarterly 9130 financial report. Now, I know the slide says December 14th. That is a mistake on our part. The 45 days from September 30th would actually be November 14th. That is when the final quarterly report would've been due. Another 45 days out would be a total of a 90-day period.

And again, our apologies for this slide, that would be December 30, 2019. So again, on the 90th day is when the closeout 9130 report is due and by this date, you should have drawn down all funds that you are entitled to under this award.

If you do not draw down your funds prior to this 90-day timeframe, you will be required to provide an explanation as to the reason for the late drawdown request and possibly additional information as to what steps you will put in place to ensure this does not occur in the future. So on the screen, what you see here is a snapshot of the closeout notification letter that you will receive within that, again, seven days prior to your period of performance end date.

In the notification, it will highlight the grant award; it will highlight the upcoming expiration date. What I will draw your attention to is in the middle of the message is a link which will guide you to the grant closeout system where you submit your closeout document package.

Lastly, at the very bottom of the screen, inquiries should be directed to the resolution specialist and again, in this location, you will find the name of the resolution specialist assigned to close out your award, their email address as well as a phone number contact.

MS. TOPPIN: Thank you, Avery. So we had the one question from James, "Will the closeout and package be sent out so that it'll be available online?" I believe you just answered that question with the last slide.

MS. MALONE: Yes, ma'am. OK. James, yes, it will be sent to you via the email. It will be generated from the system once the resolution specialist has been assigned the grant number for your particular award. When it's reaching that seven-day window, they will go into the system and generate an email that will be sent to your organization.

Now, I will say be mindful of the fact that depending on who you have as your authorized representative is who that email will go to. So if there's somebody else in your organization that is going to be responsible for completing the closeout package documents, you want to be sure to reach out to your federal project officer and provide them with the email, name and contact for that individual so they can be included on the closeout notification letter.

Any more questions? Next slide. So in addition to the closeout notification that you will receive, almost immediately after that notification, you will receive another email, which is the end user manual. This document is a complement to the notification email and essentially, it will provide you a copy of the user manual to help you navigate the grant closeout system.

So elements of the grant closeout package, I'm going to run down each one of these forms to give you a little bit of an understanding of them, if you aren't already aware of them and then I will also provide a little bit of insight, depending on the type of grant award that you may have. Well, that may be – might not be necessary, but I'll just give you a brief explanation of all the forms.

So most of you should already be familiar with the final quarterly 9130 financial report and that, again, is just a financial report used to report all of the expenditures, administrative requirements, any match if your organization was required to provide match, which I believe for these particular grants, you all don't have a match requirement.

You will also identify the amounts you've drawn down or have dispersed with regards to expenditures on the award. The next document is the grantee's release. And essentially, this form is where you will place the cumulative final expenditure amount that you have spent under this award and it will be the same amount that also goes on the closeout 9130 under your total federal funds expended.

The grantee's release is just a form that relieves ETA of any future financial obligations. The government property inventory certification is a form that is referencing the purchase of equipment. So for our purposes here, property relates to any equipment that has a fair market value of $5,000 or greater at the time of closeout.

If you have charged – or if you have purchased equipment and you report that, then the resolution specialist will provide you with an inventory list template where you will be required to provide us a little further information regarding the equipment that was purchased, some brief description of it, the fair market value at this time as well as what are your intentions for continued use of this particular piece of equipment.

Now, I will tell you be mindful that prior to getting the closeout, any equipment that was purchased that had a fair market value of $5,000 or greater, you should have approval from your FPO or from – to make sure that they were OK with that particular purchase. If you have not and your grant gets to closeout, our resolution specialists are trained to comb through the entire grant award, all modifications and to make sure that that is in here.

If it is not, you may be faced with some potential disallowed costs. So be mindful of that and reach out to your federal project officer if you have not already done so and you've purchased some equipment. Moving onto the grantee's detail statement of costs. This form is used to indicate how ETA funds were spent in accordance with your federally approved SF-424A form and I believe we will give you a little more clarity with this in one of the later slides.

There are a couple of more forms that I want to point out to you with regards to the detailed statement of costs. If you have requested to charge indirect costs to this particular – your particular award and you've identified them on your detailed statement of costs, you will be required to provide us with a federally approved negotiated indirect cost rate agreement as well as a brief indirect costs calculation breakdown.

And again, this will be provided to break down – template will be provided to you by the resolution specialist. So if you have any questions, they're more than capable of walking you through the process. With regards to the grantee's assignment of refunds, rebates and credit, this is a form that just has the – has you certifying that you will return the ETA any monies you received due to a refund, rebate or credit based on expenditure of these grant funds.

And lastly, we have the grantee's closeout tax certification form. The tax certification form is essentially a form attesting that you have adhered to any required taxes that must be paid in whatever city, state or county that you are operating this ETA program. Now, just again, another side note, sometimes in the evolution of our process, we're constantly updating how we operate and close out to make it as efficient as possible.

We also have to work with our IT specialist in order to update our systems as quickly as they can to keep up with us. Sometimes there's a bit of a lag. When you receive your closeout package, if you see it referred to governmental or non-governmental recipient, don't mind that. The reality is is the way we are doing business now any discretionary awards that are given out you are required to complete every last form that you see on this slide.

So that's just – again, I know it may come up. Again, at the point of closeout, don't hesitate to reach out to the resolution specialist and confirm that – do I have the right package? Next slide. So the ETA-9130 form, there are essentially two financial reports that you have to complete. The first one is the final quarterly 9130 and then you have to submit the closeout financial report.

The final 9130 report, as it says in box 1, must be submitted no later than 45 calendar days after the reporting period ends and/or – excuse me, it says, the final 9130 report must be submitted no later than 45 calendar days after the reporting period ends which the grant period performance expires or all funds have been expended, whichever comes first.

You may be wondering why you have to fill out two reports. The closeout financial report is essentially a form that allows you to make any adjustments that you may not have been able to account for at the point of the grant expiration, whether that's a late invoice that came in even though it was accrued during the period, we will allow you to receive those funds for that expenditure.

We just want to make sure that with the closeout report, all expenditures, all numbers are final and accurate for reporting purposes. Next slide. So an example of the final quarterly 9130, most of you all should be familiar with this particular form. Now, I will just highlight a few areas for us real quick. So if you look at lines 10a and 10b, they show the cash receipts and disbursements that are being reported for this particular period.

And if you look, you'll notice that line 10e, the federal share of expenditures, it's circled and the number is different from what's identified on cash receipts and cash disbursements and that's OK at the period of performance end date for submitting your final quarterly 9130.

We understand, because we are requiring that you report on an accrual basis that your expenditures may be higher than the cash that you've actually drawn down from the payment management system, which is for cash receipts and what you're identifying as cash being disbursed to reimburse for whatever expenditures have come in.

So that's normal. There's no need to be alarmed. I believe that for this particular report, the cash receipts are prepopulated and you aren't able to edit that particular line item. Again, you don't have to worry. Once you get to the closeout report, you'll be able to edit that to update it what the final cash drawdowns and disbursements is and again, line 10a, 10b and 10e must all match on the closeout 9130. Next slide.

So this is an example of the closeout financial report. And if you look, you'll see that the line 10e has increased to 1.257.461, but if you go up to the top, you'll also see that the cash receipts and the cash disbursement 10a and b are in agreement with those final federal expenditure amount.

On this report, you also – well, you should be mindful on all of the reports, but on this final closeout report, also we'll be paying attention to line 10f, which identifies the total administrative expenditures that you have expended under this particular award and I believe for this particular program, you would have an administrative expenditure limit of 10 percent.

So you don't want to exceed that. If you do, those costs will be subject to disallowance and you may have to return funds back to ETA. I believe that's the only requirement that I'm aware of. Next slide. So again, this slide is just showing you a side by side look of the final quarterly 9130 – (inaudible) – the closeout. Now, mind you, you'll notice there's not much of a difference.

Again, the closeout is essentially a report used to make any last-minute adjustments that are required and it's to ensure that we have accurate and complete records at the point of closeout. Again, in order to get to the closeout 9130, you'll have to submit a final quarterly 9130 and you do that by marking in box number 6 that, yes, this is a final quarterly report. Next slide.

Liquidation of obligations and accrued expenditures, once we have reached the point of closeout, you are not allowed to incur any new obligations. So at the point of closeout, the only thing you will be liquidating is accrued expenditures. And again, be mindful that grantees are not allowed to direct charge any staff time to continue addressing closeout submissions.

Only allowable expenditures are those that are incurred during the period of performance. So again, this is referring to compliance with terms and conditions of your award or regulatory requirements and as I stated in the prior slide, the only one I'm aware of at the moment for the financial reporting is the 10 percent limitation on your administrative costs.

Now, at the bottom of your final quarterly 9130 report, you are able to submit a cost calculation breakdown for indirect costs expenditures and again, you need to identify the type of rate you're using, whether that's a provisional, final rate, predetermined rate, maybe amount of that rate the period of performance – or the period of time for which it was approved the base that you use to calculate the rate, the amount charged and then the federal share of that.

Now, you are only able to input this information on the final quarterly 9130 and once you submit it, you are not able to make any adjustments to it.

If, let's say, that you submit it to a 9130 using a provisional rate, closeout is able to close on a provisional rate, however, should you choose to close with your final rate and you're not able to present it on the closeout financial report, do not be alarmed, the closeout resolution specialist will provide you with a template that you can submit to them via email and we will use that as your final indirect costs calculation breakdown.

But this picture right here gives you a clear idea of what we're looking for when we ask for the costs breakdown. We're looking for the rate you use, the base that you use and the amount and it should total to no more than what you've been budgeted for. As I stated earlier, if you have indirect costs and charge to the award, we would like to see a copy of your indirect federal approved cost rate agreement.

So here what you're seeing is the first page of a rate agreement and towards the middle of it you can see the type of rate and they identify final provisional. It gives you the period that each rate covers, the rate amount and right below that where there's a little star, it says base. In this particular example, it says total direct costs, including – or excluding capital expenditures, construction and flow-through funds.

Be mindful of the amount to use as the base, because our resolution specialists will double-check your calculations to ensure that you have not exceeded any base limits. The base you use must solely be based upon whatever has been approved by your – (inaudible) – agency. On the right-hand side, you see a copy of a breakdown from a cost allocation plan.

So outside of indirect costs, closeout will also accept cost allocation plans that are used in lieu of indirect cost rate agreements. We still will require a calculation to demonstrate how you arrived at that final indirect cost expenditure that you are charging to our award.

The form on the screen that you're seeing now is a detailed statement of cost and again, as I stated, it provides you with a snapshot of the approved budget that was submitted on your SF-424A and if you look at the first column, you see cost categories, what we are looking for when you submit this form is to see a direct reflection of those cost categories that were approved in your budget.

So on the screen, we see travel, supplies, other, contractual. This is what we want to see when you submit this form if this is what's on your federally approved budget. We appreciate the extra detail, however, if you submit your cost categories and you identify mailing and postage, telecommunications, we're going to have you go back and revise it so that it's in accordance with your federally approved budget.

The next column you see with the one is the grant budget. This amount should reflect exactly what was approved on your SF-424. Do not deviate from those numbers. The very next column is your cumulative costs where you will show as a comparison of what you actually spent and compare it to what was actually approved.

Now, for multiple awards, I believe there is a budget line item flexibility that you are allowed and it is normally based upon 10 percent of the total award amount. What this means is should you find that for some particular line item you've exceeded the limit of what was actually approved, you have a little bit of a flexibility that you can work with without having to go back and request a newly revised budget.

However, if you exceed that limitation, you must now, at the point of closeout, come in and ask for approval of a realigned budget. Next slide. Now, for the most part, we want to avoid this if possible, however, if you get to closeout and you realize that for whatever reason it slipped through the cracks, there was some unfortunate circumstances that you could not avoid, you can request a budget realignment at the point of closeout.

This does not allow for a new modification approving a budget, however, we ask you to provide a justification to your FPO regarding the need for the realignment. You must identify what you were approved for, what you are asking to be changed and then a solid justification as to why we should consider this. Based upon this information, your FPO will make a determination and provide us with a recommendation.

Then either we accept this and use it for the purposes of closeout or they will not agree with this recommendation. At the point of closeout, your FPO no longer has authority to approve any budget realignment. So all that they're going to provide us a recommendation and then closeout we will make a final determination as to whether or not we will allow for whatever realignment you're requesting.

So the best way to avoid this is to not wait until the last minute. Next slide. So we'll pause for a quick moment. Are there any questions?

MS. MCCALL: I didn't see any additional questions in the chat, Avery.

MS. MALONE: All right. We're moving along then. We're making pretty good time here. I'm going to try to wrap this up as soon as possible; OK? Hopefully – (inaudible) – were clear and – we'll answer that in a moment, James. So moving on, we have the property certification form. Again, for our purposes, we are referring to equipment that you purchase as property.

And if you see, the upper half of the screenshot gives you the basis of the property certification form and it's essentially two spots. There's a radio button as well as a place for you to input information and essentially, all it is asking you is if you have, in your possession, any equipment that you purchased with grant funds with a fair market value of $5,000 or greater, you'll select the top button or if you don't, you'll select the button.

Now, depending on which you select, the very next form you see below it is a template of a property inventory listing. Your resolution specialist will provide you a copy of this so that you can complete it and, again, it gives us the information we need in order to give you proper instructions with regards to what to do with property that was purchased with grant funds after the grant awards expired.

Whether or not that's to retain it for the current purposes it's being used, whether it's going to be used for another purpose or if it's for disposition as far as, at this point and time, it's considered junk and you want to – (inaudible) – or scrap it, but you must provide us this information so we can give you the necessary disposition instructions.

So there were two more forms that we didn't actually get a chance to view. One is the grantee's release and as we – I stated earlier, it's essentially, you're going to provide the total federal share of expenditures that's also the same amount that's reported on the closeout final 9130 as the total share of federal expenditures. So we didn't include it in the slides.

We didn't necessarily think that we needed to. I would say it's the same thing with the tax certification. It's essentially a form that you're attesting to the fact that you have complied with all of the local tax laws and again, it's straightforward. You basically put in your information as far as the approval that you acknowledged that what we've asked for is you're attesting to your organization has addressed that issue.

Next slide. So the preliminary settlement letter. Now, once your grant has completed the closeout process and we've reviewed all the documentation, we've addressed any issues, everything reconciles, you're good to go, this is the final notification that you will receive that will be issued by the resolution specialist. It's generated from our system once they input the necessary data regarding your award and it essentially lets you know that at this point and time, no further action is required of your organization.

We have your grant as expired and closed at this particular dollar amount. It provides for a few specific items with regards to things that can happen after award. So the fact that you have this preliminary settlement letter that says you've completed the closeout process, ETA still reserves the right to disallow costs or recover funds that may be based on an audit that comes up later or some other type of review.

Again, the fact that you are mindful that your organization must return any monies due to the federal government as a result of a later refund or correction. And lastly, your responsibilities for retaining all documentation related to this award for whether it's in excess of – to that documentation or to the equipment and any other requirements that may come up. Next slide.

So common misunderstandings in closeout, again, expenditure amount being higher than the drawdown amount as we identified on the final 9130. That's a normal occurrence, because these expenditures are approved when you're reporting them. So the closeout 9130 is the report that you will make sure those amounts reconcile and again, your drawdowns, the 10a tax receipt, your disbursements 10b and your federal share of expenditures line 10e they will all need to match on the closeout 9130 report.

Completing the inventory equipment form, sometimes this does cause some minor misunderstanding. The biggest thing is once you've identified whether or not you have what is considered equipment or not, you must complete the inventory equipment list and based on that can sometimes cause additional items to come up that need to be looked into further as far as how the equipment will be handled.

All required forms and documents to be submitted, so when we say all required forms, we're referring not only to the financial report, the closeout package that you submit through the grant closeout system, we're also referring to the emails that you will be required to forward to your resolution specialist if you have an inventory list that you need to submit or the indirect cost rate agreement and the indirect costs rate calculation.

Common issues which delay closeout, again, communication is key. Nonresponsive grantees are usually the major reason why our grants are not closed out within a one-year timeframe. Some other issues that delay closeout, refunds. In the past, we used to allow for paper checks to be submitted and the process for submission of a paper check to go through our office or our accounting office to go back to treasury or HHS was a convoluted process.

So now we have the electronic payment initiative, which is a website that all recipients are required to go to to submit refunds and I believe the website address is pay.gov. That's p-a-y.gov. Equipment disposition, yet sometimes, again, this is a hang-up. Some of our grantees buy some serious pieces of equipment that's outside of their program use, there might not be any other need for that.

So try to figure out the best use and what we should do with that equipment can sometimes delay the closeout process. 9130 issues, again, whether it's the reporting itself, hopefully the systems will be up and running and you won't be experiencing too many system related issues. The only other thing is with regards to ensuring that, again, those line items match as far as 10a, 10b, 10e.

Make sure that you've adhered to any administrative cost limitations. If your program, for whatever reason, has generated program income, you want to make sure that that's extended right away. You don't want it to come to closeout, because it will reduce the amount of the award that –

MURAN SAFFA: No. They have to be used for program income before using – (inaudible) – to be allowed.

MS. MALONE: Thank you for the correction. So as my supervisor just stated, you need to make sure you use that program income before you use any of our federal funds, otherwise, it will be disallowed. The indirect costs issues, that's also another area where it causes delays.

What we've done recently, I believe, is in your terms and conditions, if you are intending to charge indirect costs to this award, you normally have a 90-day window to submit proof that you are seeking indirect costs rate agreement. If you don't and you wait to close out to try and get indirect costs rate issued to you, we will not delay closeout for this purpose, because in your terms and conditions, you've been given the instructions.

We will disallow any costs that you tried to recoup based on indirect costs that aren't supported by indirect costs rate agreement. Lastly, questions and disallowed costs related to initial determinations or final determinations, this can happen in audit resolution. This can happen because of a monetary review. It can happen because of a closeout review.

If we identify something that is out of order and aren't able to resolve it through whatever revisions that are possible. We will issue a determination to disallow any unallowable costs and you'll receive the initial and final determinations. And lastly, the budget realignment, which if we don't wait until the last minute, it won't cause us a delay.

So again, if you feel like you may be exceeding any approved budget lines and you are beyond that 10 percent flexibility. You definitely want to go to your FPO right away and submit a request to have a budget modification. It's different from a budget realignment, which happens at closeout. So refunds we've already covered.

And again, if you look at the very last bullet point, the electronic refunds are done through the pay.gov website. Any questions? Oh, going back to James' question. So I know –

MS. : All right, James. I see you have a question. You said your grant and – (inaudible) – October 31st and July 31st. The due dates for the closeout and the final report, because your grant doesn't end at the end of the quarter, means March 31st or June 31st or 30th of September is going to be a little bit tricky. So because it's the end like the July one, you have one more quarter to submit, which is the September quarter.

Unless you've already expended your grant in June, then you can submit that at the final report. If you don't, then 9/30 will be your final quarterly report and – which you need to submit in November 14, 2019. Then at the same time, on November 30th, that's when you're going to submit your 9130 and all required closeout documents. So everything has to be submitted by November 30th for you July 31st.

Same goes for your October – for the October – your final January 30th – (inaudible) – the 90 days, but because it ends in December 31st, we're going to push one more month – (inaudible) – in February. So February 14th would be, 2020, your final quarterly report and February 28, 2020 would be the closeout 9130 and the remaining of the closeout documents.

MS. MALONE: Thank you.

MS. TOPPIN: Again, any questions?

MS. MALONE: Excellent. So follow-up, quick question for the group, does marking yes on box six of the ETA 9130 trigger the closeout process? We're 50/50 right now. OK. So it looks like so far the majority of the people believe that, yes, it does trigger the closeout process and the correct answer actually is no. For the most part, the closeout process is triggered by your period of performance end date.

So when your period of performance ends, that's when closeout begins. Now, there always are exceptions and what I'll say is as for the question that was posed by James with regards to the strange – not necessarily ending on a quarterly basis, if your grant, let's say, expires on the 30th of November, but you have – or I'll take that back.

If it expired on the 30th of September, however, you determined that you've wrapped up all of your – all your grant activities prior to that, then you can always request for an early closeout. So in that case, if in June you submitted a final quarterly report and asked your grant officer to approve an early closeout, then technically, it could've been triggered by you marking that as your final report, but for all intents and purposes, closeout begins when your period of performance ends.

Next question, so your grant ends September 30, 2019. When does the grantee need to submit the final 9130 and the closeout 9130? Pretty good responses so far. So right now the majority of the respondents are saying that if the grant ended September 30th, the final 9130 would be submitted on November 14th and the closeout 9130 would be submitted on December 31st.

And the answer to this question is correct, you should submit 45 days out from – is that the same question?

MS. : Yeah. Oh, she – (inaudible) – in this slide.

MS. MALONE: Well, again, number two was the correct one, on November 14th, you should submit the final 9130 and the closeout 9130 would be submitted on December 31st. Next slide. You're past that. OK. So that does it for our poll questions. We appreciate your time. Are there any further questions that you all have for us? So hopefully we were successful.

MS. TOPPIN: Avery, there are a couple questions in the chat. Someone's requesting your telephone number and email address. James is requesting your contact information.

MS. MALONE: (Inaudible) – I did not put it in the slide. James, excellent question.

MS. KITTRELL: James, if you send an email to rtw@dol.gov, we'll respond back with Avery's information.

MS. MALONE: Thank you, Danielle.

MS. TOPPIN: OK. And Brianna (sp) asked a question, will FPO officers conduct a final audit for grantees?

MS. : Actually, the FPO does not do a final audit, but – which they do a – (inaudible) – review or monitoring. So even at the end, a grantee is required to submit their all performance – 45 days, the performance report as you submit your final quarterly report.

MS. TOPPIN: Great. So I'll hand it back over to you.

MS. KITTRELL: OK. Thank you, Kisha. So we have one more poll for today. We're pulling it up. Choose the topic below from today's webinar that was most helpful. So one grant closeout process from Avery's great presentation, that was so substantive. And of course, programmatic.

We have some subcategories of staffing, participant services, partnership, performance reporting and program sustainability. Grant closeout process is the frontrunner. We're so happy he was able to join us today.

MS. MALONE: And again, I know it's a lot of information – (inaudible) – reach out, we're more than happy to respond to any questions.

MS. KITTRELL: OK. Thank you. And as for resources, we have listed the Grant Closeout Process, a PDF PowerPoint, as well as the H-1B Staff Transition tip sheet from our webinar in November and the H-1B Ready to Work Grant Wrap-up checklist that we also released in October. These are all available if you look to your bottom right, you see FileShare, you can download it there and it's also on the event webpage as well and they also are available on the Ready to Work community of practice.

And as a reminder, these resources are not to be considered a guidance and please contact your respective FPO for any questions or follow up. Thank you. And once again, please continue to contact the national office via the Ready to Work Mailbox and we'll be, of course, providing Avery Malone's contact information at a later date.

Thank you. And lastly, I'd like to thank everyone for attending today's webinar. Special thank you to today's speakers Avery Malone, Kisha Toppin, Eric Humphrey and Lyle Neumann. Once, again, thank you and we'll be following up accordingly. Enjoy your day, everyone.

(END)