**WorkforceGPS**

**H-1B Grantee Conference: Closeout and Grants Management**

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*Transcript by*

*Noble Transcription Services*

*Menifee, CA*

GREGORY: Hi. We're happy to end the day with maybe not the flashiest thing, but one of the most important things you're dealing with here towards the end of your grant cycles. I'm talking about grant closeouts and grants management.

With us today is Avery Malone who is with our grants office, is going to talk about closeout issues that you guys should be aware of. We also have Adrian Barrick, FPO Region 3, who is going to talk a little bit about period of performance – (inaudible) – what we are looking for, some of the things that from the FPO perspective we're looking for. So, should be very good and we're going to give lots of time, if you guys have questions that we can entertain those.

With that, I'm going to go ahead and ask Avery to come on up and talk to us about closeouts.

AVERY MALONE: Good afternoon, everyone. How are you doing?

AUDIENCE: Great.

MS. MALONE: Excellent. I hope you had a good lunch. Thank you for that introduction, Gregory. I would beg to differ. We tend to believe in closeout we have the flashiest group around, so don't worry. They saved the best for last. All right? Again, thank you all for attending.

I don't know much about the program, but I had started to look into your FOAs and just the whole concept of strengthening working families and improving the American talent pipeline to me is really amazing, so I want to thank you for even taking on such a monumental – (inaudible) – to try and help our society. Can I give you an opportunity to give yourselves a round of applause? All right.

With that being said, we're going to get into this. Again, I've tried to keep it as lively as possible. I don't want you all to fall asleep because there are a few things that I want to make sure that we hit home with.

To kind of start this out, a lot of times when I do these presentations I speak about the importance of communication and how that probably is the most fundamental aspect of making sure that you have a smooth closeout process. That is still the same: communication is key. But, something I wanted to kind of touch on is the whole concept of preparation.

I have a little analogy that I've been thinking about lately. I don't know how many of you all are sports fans, but the analogy I had in mind is referencing boxing. I don't know how you feel about boxing. I don't know if you enjoy it or if you dislike it, but just humor me for a moment so I can lay the foundation of this presentation.

In boxing, normally you have two competitors that train and prepare themselves for a competition. Essentially, they want a shot at the title. If you've been awarded this grant, you've essentially got your title shot. With that, again, their preparation requires a lot of assistance, so they have their promoters, their marketers, their training camps to get them ready for this battle. I'm looking at your program office who's put together this particular presentation opportunity as one who has assisted as part of your team.

The Office of Grants Management Operations side of the house that awarded you the grant, we have gran specialists that have been working hard to make sure that we get these grants out the door. Then you have your federal project officers and our regional colleagues that all are providing you with some level of technical assistance and guidance as you prepare for this battle.

Now I want you to look at us as your competition because we're here to work with you, right? Essentially your competition in this particular scenario would be a loss or some sort of negative outcome, and that's what we want to avoid. In this particular scenario, this office is the referee. We have a stake in this, but for all intents and purposes we want to stick to the rules, so we're going to just call it as we see it.

Now, as you're training and preparing, you're conditioning your body. The one thing that, from what I've heard many boxers say, was no matter how much training they did, usually if they had a setback it was from a blow that they didn't see coming. What we want to avoid is you all catching a blow that you didn't see coming.

As the referees, we ask the competitors, "Come to the center of the ring," and essentially you hear the referee say some things such as, "No hitting below the belt. We want to see a good, clean fight. No hitting in the back of the head," and right before he dismisses each competitor to go back to their neutral corner he says, "Protect yourself at all times." So, if I do my job well, hopefully you all will be prepared and won't catch any unseen blows which may knock you out or cause you to stumble.

With that being said, that's the foundation. That's how we're going to approach it.

Of course, our process is very simple. What we're going to look at are these three objectives as you see on the screen. We're going to discover how to prepare for closeout and we'll give you a few hints and tips along the way. We're going to keep very simple. We're going to show you elements of the grant closeout package and you'll also learn about some of the common issues that delay closeout.

The completion of the grant lifecycle. What is closeout? It's essentially the means by which the Federal awarding agency or the pass-through entity determines that all applicable administrative actions and required work under award have been completed.

Once this happens you can now go into the final phase of your grant cycle, which is the closeout process. It officially marks the end of the government's relationship with the grantee. I say marks because there's always nuances that can occur that may extend this process. It won't extend your ability to do work under their grant, but it may extend the relationship.

If you look under our Uniform Guidance 2 CFR 200.343, it essentially gives you the framework for closeout, which identifies a 90-day calendar period that you have to submit all required closeout documents under this particular award. 2 CFR 200.344 speaks to post-closeout adjustments.

As I said, even though we're going through the closeout process, there're always little nuances, so this particular reference, in the case that the federal government still has the responsibility and the right to disallow costs and collect funds based on a later audit or review.

If we go to 2 CFR 200.345, selections of amounts due, this just gives you the framework with regards to if there is determined that you owe some funds back to us, there's a certain timeframe that you have to get those funds back to us. Then 2 CFR 2900, we say are exceptions to the rule. In this particular Subpart D speaks to the liquidation of obligations and accrued expenditures.

Who we are. The Department of Labor Employment and Training Administration's Office of Grants Management, division of policy, review and resolution under the leadership of LaTonya Torrence. There are three units that are under this particular division. The first one is the policy unit, which is headed up by Debbie Strama. We have the audit unit which is headed up Ana Moreno, and we have the closeout unit which is headed up by Meron Assefa. I am assistant to her to ensure that we do our best to close.

As you could see, the workload is anywhere from 1,000 to 1,200 awards, so we have a lot of work that we're pushing out and we're fully staffed. We have more than, I'd say, 50 years of experience with working – (inaudible) – if anybody can get you through, we can.

Preparing for closeout. This is really how we prepare for closeout for the most part. We anticipate our workload a year out because of the volume of work that we have to address. Quarterly, we run a report and provides us an idea of the timeline with which particular awards are fast-approaching their closeout. I'm sorry, the period of performance expiration date.

We take that report. Then we compare it to what is our electronic-grant closeout system. Based off of that reconciliation, if it is determined that your award is on the way to its period performance end date and it's not granted per your performance extensions, it has been assigned to a closeout resolution specialist.

Now, I will direct your attention to the last point on this slide, which says not less than seven days prior to the period of performance end date, closeout specialist sends out an initial closeout notification letter to the grantee. Essentially, this bullet point is stating that within seven days of your grant's period of performance end date you should receive some notification from our office.

For example, if your period of performance expiration date is September 30, 2020, when you get to September 24, if you haven't seen any notification from our office, you need to reach out and touch someone. You could speak to your federal project officer, anybody who has assisted you this far, this point in the whole process because they can easily reach out to our office and let us know, "Hey, there may be a glitch or something happened in the system that this grantee has not received their notification."

Now, 9 times out of 10 it is something as simple as it went to a spam box, it may have gotten deleted, or what happens more often than not is that the contact information is outdated that we have. One of the ways that you can prepare for closeout is to ensure prior to 30 days of your period of performance end date, make sure whoever is responsible in your organization for submitting the closeout has provided us with the updated contact information.

We will normally reach out to an authorized representative on file and sometimes those are out of date as well. So, again, the best way you can ensure that you don't lose any of your 90-day period you have to submit closeout documents is to ensure that we have updated contact information.

Closeout begins. OK. We are in the closeout process. Within 45 days after the period of performance end date you required to submit your final 9130 report. As the first bullet point says, check box 6 as final. I'm sure most of you are already familiar with the financial reports. This is no different.

At the end of every quarter you have 45 days to submit your report. This one, however, at the period of performance end date will be your final quarterly 9130 report. It's major final report. By checking box number six, there's a little radio button that says yes or no. You check yes. You submit that report. You submitted your final quarterly 9130 report.

The next bullet says 70 to 75 days after the PoP end date, specialist sends a follow-up reminder. Another way to put this, two weeks prior to that 90-day period that you're supposed to – (inaudible) – your closeout documents, our resolution specialist will reach out to you again.

They'll send you a reminder just to say, "Hey, just checking in on you. We know that your closeout due date is fast approaching. Haven't got your documents in. By all means, please submit them as soon as possible. In addition, if you have indirect costs that you've charged to our award, there will be additional documentation that we require, or if you have equipment inventory that you purchased under our award, we will require further information regarding those particular equipment."

In that e-mail, they should've attached two sample templates that you can use to assist you with this process. Again, communication is key, so if at any point in time there's something you don't understand, you can reach out to the resolution specialist; they're here to assist.

Again, under 2 CFR 200.343 in the Uniform Guidance, you are required to submit every piece of closeout documentation necessary to closeout your award within that 90-day period. Everything we do is in accordance with rules, regulations, public laws, statutory laws. Everything we do, we have some basis as to why we're doing it and we can point you to it. Again, the best thing to do is adhere to the rules and guidelines you got from the referee at the beginning of the fight.

Grantees may not charge staff time to work on closeouts of the grant after the period of performance end date. We get a lot of questions about this. Plain and simple, if these costs have not been already factored into your indirect cost pool and you're charging indirect costs to the grant, you cannot charge our grant for any work done after the period to performance end date. It cannot be a charge since it's after the grant has already expired. You will either have to find another way to cover those costs or you may have to eat them yourselves.

Ninety-one days after the period performance end date, that's when, ideally everything is going well, you have submitted every piece of documentation we need to do our review and ensure that you have adhered to all compliance regulations and all reconciliations has been addressed as far as the funds that you have drawn down from our accounts and paid out your vendors or goods and service providers to ensure the award has been successfully completed.

Here we are just referencing that the Department of Labor Manual Series 2 Chapter 800 provides us with a year to closeout your award. Do not confuse the year we have; all your documents are in order and everything is good to go with the 90 days you have to submit the documentation.

If you exceed the 90-day limit, the potential for a determination regarding this allowance calls for not adhering to the guidelines or the guidance given is something that you may have to address. It doesn't mean that it will end that way, but, again, it's just an additional hurdle that you'll have to overcome. Again, we're trying to help you avoid issues.

Now, as you can see, the third bullet point, the Uniform Guidance which came out December 2014 is essentially backing up the fact that we have one year in-house to make sure that we have completed the closeout of your grant award. Now, some of you may be saying it was 90 days; how does this stretch out to a year? Sometimes things happen. The reality is I can say that all intents and purposes, we tend to close out 95 percent of our awards in a timely manner.

The last bullet point – this is something fairly new. It's been around for a few years now. It's the GONE Act, the Grant Oversight and New Efficiency Act put out by Congress, Public Law 114-117. Essentially, this law is stating that Congress, I guess, got word that that for some grants that we still had on the books, they were open even longer than the one-year period and they were trying to get a handle on, "Well, why are these awards still open?"

Again, things happen. You'd be surprised. All I'm here to tell you is after that two-year period we're required to provide Congress with a report, explaining why we weren't able to close out this award and who this particular award was given to. We don't want to catch any flak from Congress and I'm sure you don't either, so the best thing to do is keep your name off of this list and ensure we don't have a list to send to Congress.

The closeout deadline. This is just a very quick example, a snapshot, just to give you a snapshot of the 90-day period. If your grant expires September 30, 2020, your closeout process begins that very next day. In agreement with the financial reporting requirements, you have 45 days to submit your quarterly report after each quarter. Since this is the last quarter that you'll be submitting on, you check that little radio box that says final, you submit it. The 45-day would bring you around November 14.

Forty-five days plus another 45 days, which equals 90, which is the amount of time you have to submit all of your closeout documentation says that by December 30 you've submitted to closeout 9130. The closeout package and any additional documentation that may be applicable to your organization, whether that's an indirect cost rate agreement, inventory lists, all documents required to close your grant must be submitted in those 90 days.

For this next slide right here, it's just giving you an example of this notification letter that you will receive was the closeout resolution specialist. Again, within a week of your grant's expiration, a week prior you should see this notification. It may come a little earlier, but, at any rate, if you don't see this within a week of your grant getting ready to expire, you reach out to your FPO and you let them know to contact the closeout office.

This is essentially the body of the e-mail that you'll receive. It provides you with the grant number, as well as the expiration date. It also references the 2 CFR guidelines that indicates you have 90 days – 90 calendar days – to submit all closeout-related documents, as well as giving you insight to how you'll actually submit your closeout package.

Through the grant closeout system you submit your financial supports. You'll use that same system to submit your closeout financial report. In order to submit the other documents that we will go through later on in the slide, you have to go into the actual closeout grant system. The closeout grant system is embedded within the grantee reporting system that you – (inaudible) – financial report. You won't have access to it until you get to the point of closeout. Once you do, when you go in there you should see a little link that references view closeout grant. You click on that link. That gives you access to the closeout system.

The last thing I'll point your attention to is at the bottom of the e-mail. It'll let you know the closeout resolution specialist that has been assigned to assist you in closing out your grant award. It gives you their name, their e-mail address, as well as their phone number.

In addition to that closeout notification, shortly after receiving that you should receive a second follow-up e-mail. It will contain an end user manual to help you navigate the closeout grant system. Essentially, this is just a follow-up e-mail with an attachment to it. Once you get the first one, shortly after that you should see the second one pop up, and this is the body of that e-mail. Again, you're just looking for that attachment that will give you the manual to work through the grants closeout system.

Elements of the grant closeout package. All of these are elements of the grant closeout package. Depending on your particular award and what type of costs you've charged to your award will determine whether some of these are actually applicable to your organization. Of course, you're familiar with the financial report. As we stated, you have the final quarterly 9130 and the closeout 9130 report. Two separate financial reports, both of them must be submitted as far as being a part of the closeout process.

The grantee's release is a form that will – it essentially reliefs the government of any future obligations associated with this award. On this particular form you should put the cumulative amount of expenditures on the award as is also cited on your closeout 9130. Whatever the federal share of expenditures that's on your closeout 9130, that should be the exact same amount that's on your grantee's release.

The government property inventory certification form is a form that essentially – (inaudible) – whether or not you have purchased inventory items with grant funds. We have a copy of it on one of the later slides. It's a very simple form, but it gives you two options: one option is you have purchased inventory; the other option is that you haven't.

Now, when we are referencing property or inventory, for our purposes we're not talking about real property, we're talking about equipment, and in particular, equipment that has a fair market value of $5,000 or greater at the point of closeout. If you have equipment that you've purchased with grant funds that meets that definition, we will require additional documentation from you.

The inventory list is what is going to be required. Now, as I've spoken, one of the e-mails you'll receive as far as a reminder from the closeout specialist, they will provide you with two templates that you can use if it applies to your organization.

The inventory list is something that applies to the fact that if you're saying you do have inventory that meets that definition, we'll require additional documentation, or not documentation but additional information with regards to a description of the equipment item, identifying number, the acquisition costs, when you purchased it, what's the fair market value of that particular item at this point in time, and, most importantly – and I believe we have this on another slide as well – we'll need to know what your intended purpose for using that equipment after the period of performance end date.

The grantee's detailed statement of costs, that's a form that allows us an opportunity to analyze how you spend these grant funds in accordance with your federally-approved budget, which is submitted on, I believe, the SF-424a. We have the NICRA and breakdown, especially if it applies to your organization, if you have charged indirect costs to our award, we need to see a copy of your federally-approved and signed negotiated indirect cost rate agreement, as well as a breakdown calculation of how you charge whatever amount of indirect costs you are charging to our particular award.

The grantee's assignment of refunds, rebates, and credits is a form where you're assessing to your responsibility that if you receive any money, based off of refunds, rebates, or credit due to expenditures of grant funds, you'll return those monies back to the Department of Labor.

Lastly, we have the grantee's closeout tax certification, and this is another – (inaudible) – stating that you have paid all required taxes in whatever state, city, or locale that you're operating our program.

Here we have a copy of the final quarterly 9130 report. I'm sure you all are aware of it. You've seen it. I'll just draw your attention to a couple of things. If you look at line – if you can see it – like 10a and 10b, and we have an amount of $1,022,835.71. Then if you go down to line 10e, federal share of expenditures, you see a different amount of $1,245,153.14.

Now, if the final quarterly 9130 (don't get along ?), essentially because we request and require that you submit your documentation in an accrual fashion, essentially this is just indicating that you're accounting for expenditures that you incurred up to this point, although you have not drawn down the actual monies and paid it out to whoever maybe was supplying you with goods and services. So, don't be alarmed. You'll have a chance to address this on your closeout 9130.

But here's a closeout 9130. Once again, you won't have access to the closeout 9130 until you submit your final quarterly 9130 report and also mark box number six as yes. As you could see, it's been done here. That's based off of this 9130. Once you do that, you have access to the closeout 9130 report. You click the closeout 9130 report link, this form pops up, and in the very first column cumulative ETA 9130, it will transport the information you put on your final quarterly 9130 report into this particular column.

The very next column, cumulative closeout, is where you can make adjustments. In this scenario, again, if you go to line 10a and 10b, which is cash receipts and cash disbursements, here you're now showing an amount of $1,257,461. If I go down to line 10e, federal share of expenditures, I have the same amount, $1,257,461. On the closeout 9130 report, these three line items need to match.

This is essentially saying that for all federal share of expenditures, the whole $1,257,000, you have drawn down $1,257,000 from the payment management system and you have also paid that money out on the cash disbursement of $1,257,000. Make sure when you close that report those three line items match up; if they don't, you'll receive a notification from your closeout resolution specialist that you need to make some sort of adjustment.

Last thing I'll point out, if you look at line 10 – and you can go back to the cumulative ETA 9130 first column – on the final 9130 report it shows $1,245,000. However, on the cumulative closeout you see $1,057,000. There's a slight increase. The closeout report is for adjustment purposes.

Now, we don't expect to see astronomical amounts here, but, understandable, maybe something was left or maybe an invoice wasn't accounted for, but if it was for costs that were incurred during the period of performance and they are allowable costs, we will allow you to make that adjustment on the closeout 9130 report. There's no need to go back to your last quarterly report; you just make adjustments on the closeout 9130.

We could skip past this, but for illustration purposes, we just wanted to make sure that you clearly understand there're two financial reports that are required for you to submit you're your period of performance end date comes, that final quarterly 9130 and the closeout 9130.

OK. We spoke about the 2 CFR 2900, which references liquidation of obligations and accrued expenditures. At the point of closeout, you're not allowed to incur any new obligations. The only thing you can do at this point is liquidate those expenditures. Again, we like to reiterate so that we don't have a concern that we have to address later on, grantees are not allowed to charge direct charges for staff time to work on these closeouts.

The indirect cost calculations. On you r final 9130, at the bottom of the form they do have a box now that you can use to identify indirect costs charges to our award. Essentially, you'll just put in the information as you see there. The type of rate that was used, the rate amount itself, the period of performance that rate is covering. As you could see, each year it expands on its own and the base that you use, you multiply the base times the rate; it gives you the amount charged, and however much you're charging to our federal awards, that's what you put in the final column.

You can only make these edits on the final quarterly 9130. Once you save and submit this report and move on to the closeout financial report, you'll have access to adjust it. If for whatever reason, maybe a small miscalculation or – the reality is in closeout we do allow you to close on a provisional rate.

Say, for whatever reason in that short span of time you had a final rate come in; you need to make an adjustment. You don't go back on the final 9130 and adjust it there. On one of the e-mails you'll receive from the closeout specialist will also provide you a template similar – (inaudible) – where you just identify the calculation that you used to demonstrate – (inaudible) – you charge to our award. We will also do a follow up of that calculation to confirm it. You're good to go.

As part of the indirect costs, again, if you charge them to our award we definitely want to see your indirect cost rate agreement. We're looking for something similar to what you see on your left-hand side. Again, it shows you the type of rate, whether it's a final/provisional, the period that it's covering, the rate that is actually used, and then that little star which is based – we want to see base used to calculate the indirect cost that you're charging to this award.

On the right-hand side we just have a sample of, I believe, a cost allocation plan that was used. The way that theirs is calculated is on a monthly basis. So, if you have cost allocation plan, we would also like to see a copy of that as well.

Compliance. As far as compliance issues, again, we strive to make sure that everything we do is in accordance with some sort of regulation or guidance that we've been given, whether that's statutory, whether that's regulatory, or whether it's in your terms and conditions of the award that you signed off on. If you go through your terms and conditions, you will see whether or not you have administrative limits on your award.

For the most part, I believe all the ETA grants do have some sort of administrative limit. Just make sure that you know what yours is so you don't exceed it. The administered limit is reported on line 10f, and in this particular example we're showing a 10 percent. As long as you don't exceed 10 percent, you won't have to worry about the concern of having costs disallowed and dealing with a determination.

I'm not sure if there are any other compliance issues with your awards from what I saw. I will note that I believe I saw a leverage resource requirement and, as far as that goes, you should be tracking your leverage resources throughout the entire life of your award. What we don't want to see you submitting on financial reports, is not identifying any leverage resources and then, by the time you get to closeout you plop a large little number in there to say, "Hey, we met our requirement."

This is a copy of the detailed statement of cost. Essentially, it ties into your SF-424a budget form. Very simple, we're going to keep it simple. Three columns. First one, cost category; the only items that you can edit over here are lines one through seven. If you want to see are the cost categories that you were approved for: travel, supplies, other equipment. If you weren't approved for postage, it may fall under other or supplies. We don't want to see it as a line item.

The grant budget, the first column, those numbers should reflect the numbers that you were approved for on your most recent budget modification.

In the very final column, the cumulative costs, we want to see exactly what the amounts were that you spent in reference to – (inaudible). Now, another item that you should be able to locate in your terms and conditions of your award is whether or not you have a budget line item flexibility.

I believe all of our awards do and for the most part it should be 10 percent of the budget amount, meaning that as long as you don't exceed 10 percent of any one of those approved amounts – well, cumulatively of the grant award amount – you won't necessarily have to come in for a budget realignment. If for whatever reason you find you have to explain that situation, again, preparation, the best thing to do will be to address this prior to getting to closeout.

We understand that budgets are a projection. If you think that you may be exceeding 10 percent for whatever reason, reach out to your FPO. Let them know, you know what, I may need to get a handle on this because we don't want to get to closeout and have this be an issue.

Now, in case you do get to closeout, are budget realignments allowed in closeout? Yes, and we have approved them in the past. We don't necessarily like to go this route, but, again, we're here to assist. If you find yourself in this situation, we just need you to provide us with a justification, a rationale of why you exceeded it and why'd you wait so long. You'll provide this justification to the FPO.

You should also keep your closeout resolution specialist up-to-date as far as the justification, when you submit it, what's going on. The FPO will review this and, because they have probably a little bit more intimate knowledge with your award and activities you've worked out, they'll provide us with a recommendation as to their particular perspective and whether or not, if you came to them with this request while the grant was still active, they would've approved it. They provide us with that recommendation.

Now, your FPO cannot approve you for a budget realignment once it gets to closeout. The most they can do is provided us with a recommendation. It is still in our authority to determine whether or not we'll approve it. So, just to keep you all from having to even address this issue, the best thing to do is just monitor your budget. If you see something that determines that you'll need to make an adjustment, get ahead of it before it gets closeout.

Property certification form. The sample template that I referenced would be attached in an e-mail. To spice things up, we decided we would show the graphics on this one just to give you a little a – (inaudible). The properly closeout form is this simple. Similar the radio button that you would click on the financial report, there's only two spots that you can identify.

Now, things happen. Don't fill out both sections. One section says that you are certifying that you have purchased property that has a fair market value of $5,000 or greater – and, again, when I say property I'm speaking about equipment. The other section says you have no government property that meets that definition.

If you mark that you do, that sample template is what we need you to fill out. Again, it just requires some additional information on those items that you're saying you purchased with grant funds: item description, serial number, acquisition date, purchase price, the current fair market value, and the condition of the item. All of those are important pieces of information that we need for our records.

Lastly, you have five columns. One says retain for current grant purposes, retained for other federally-sponsored purposes, retained for nonfederal use, sell, or scrap. We just need you to identify what you intend to do with that property once this grant is expired. Based off of your intentions we will provide you with either an approval to continue using it or disposition instructions as far as what you do to sell it or scrap it, or whether or not there's another program that may be able to use it.

Submission confirmation letter. This is something that you won't see. This actually comes in-house. Basically this gives us a heads up that you have been submitting the documentation and hopefully you did it in a very fashionable time so that when the resolution specialist sees this, they already know to go in and start reviewing your package.

Preliminary settlement letter, this is what we want to get to. You know what? The fight's almost over. You get this right here, this is essentially letting you know that for all intents and purposes you have completed the closeout process. You've done everything that's been required of you, officially marking the end.

It identifies the dollar amount that we have on record as far as what you have given us that this is all that you're asking for as far as total cost spent under this particular award. It also identifies the award number.

Then it gives you a couple of extra notes, just a reminder that we have the right to disallow costs and recover funds based on a later audit or other review, as we spoke about earlier. Your obligations to return any funds based off of a refund or a correction, and your responsibility for retaining the records, your equipment – (inaudible) – and any audit requirements that may be required of your organization.

We're almost at the end. Common misunderstandings. Expenditure amount is higher than drawn down amount. They need to match. I don't know why we worded it as I'm reading it now, but essentially what we're talking about is what we spoke on the financial report. If the expenditure amount is higher than the drawn down amount, this pretty much occurs on your final quarterly 9130 for the first most part because you've been tracking your expenditures on an accrual basis. The need to match part is on the closeout report. On the closeout, again, 10a, 10b, and 10e need to match.

Completing the equipment form correctly. I believe I already spoke on this. Hopefully you all understood. There're only two place; don't fill both of them out.

All required forms and documents to be submitted. Again, you have the 90-day period. Just make sure that depending on what's applicable to your organization, whether you're – (inaudible) – all that documentation should be in the 90 calendar day period.

Now, common issues which delay closeout, communication is key. Non-responsive grantees – I'm not going to put it all on you. You hold us accountable as well. If you need assistance and we're not getting back to you, keep on ringing, send an e-mail, reach out to the FPO, ask for a grant office, call the cops. Look, do what you've got to do. At this point in time, our resolution specialists are trained well. They should be calling you. They should be e-mailing you and just following up to make sure that it is going smoothly.

Refunds, yes, in the past they have delayed closeout. Fortunately, we've gotten a lot better with using electronics. We've gotten away from sending checks in which sometimes delayed the whole process. Hopefully that as a delay has shortened time. The equipment disposition, again, depending on what you intend to do and how you intend to use the equipment after the grant has expired may draw out the closeout process a little longer for us to get – (inaudible) – on that issue.

9130 issues, I believe we spoke on that. Again, I just want to make sure you have recorded line 10a, 10b, 10e equal, your administrative cost limits are in check, you've identified leverage resources, you've done everything you need to do.

Administrative cost issues, I just spoke to that. Indirect cost issues, again, if you submit it on your 9130 and things have changed by the time you get closeout, don't get too excited; it's not a problem. We can fix it.

Questions and disallowed costs, these are the determinations that I was referencing. Now, again, you don't want to exceed your administrative cost limit because if you do, we will more than likely have to disallow those costs and tell you, you need to repay those. It'll delay closeout because it's a process. We'll send you an initial determination. You'll have a chance to respond and then we'll give you our final determination with regards to what we decided.

Then the budget realignments. Before you get to closeout, they won't delay closeout.

Now, refunds, I think we spoke to that. Again, this is just giving you the Uniform Guidance that addresses the framework for dealing with refunds. Also, if you look at the very last bullet point, refunds can be electronically submitted through PMS or pay.gov.

Now, I guess one thing I did forget to mention with that 90-day submission period, you're required to submit all your closeout documents within a 90-day period. You should also draw down all funds that you are entitled to within that 90-day period because if you don't, on day 91 your PMS account will be locked. We're not saying that you won't get the money, it's just going to take a little more time because now you have to go through the gatekeeper and we're going to want justification as why are you requesting this late drawdown.

Then, just to make you jump over a few extra hurdles, we're going to say, "You know what? We also want to hear about what you're going to do in the future to avoid this from happening should you get another ETA grant." Again, we're just trying to make sure that you're fully prepared, no blind shots coming to you, be able to protect yourself at all times.

Frequently asked questions. We're at the end, people. Does marking yes on box 6 on the ETA 9130 trigger the closeout process? Any guesses? Yes? No? No.

MS. : (Inaudible).

MS. MALONE: Hey, you were right there. You almost had it. It was 50-50. The reality is once your period of performance end date comes, that closeout process starts. That's why we also say make sure that you also do a good job of communicating with us because a 90-day window can really slip away and we don't want you to find yourself in a position where we've actually sent out notification but it went to a spam box and now you have less than 90 days to submit all your documents. So we're ready to help you.

However, I will say that marking yes on box 6 does allow you access to the closeout 9130, so you're not getting anywhere in this closeout process until you do that.

Now, the grant ends September 30, 2020. When does the grantee need to submit the final 9130 and the closeout 9130? Again, in line with your normal reporting, you have 45 days at the end of each quarter to submit your quarterly report. In this particular case it's the end of the grant period, so it's you're 9130, still 45 days, that puts you at November 14; another 45 days – 45 and 45 is a 90 – that gets you to the end of the closeout process. December 30 you should've submitted your closeout 9130 in addition to all closeout documents.

When is the last time I can draw down funds? Obviously I'm jumping ahead of myself. You have 90 days to draw down all funds that you're entitled to. Once you get to that point, you try to draw down and they're going to say access denied. We'll get notification that you tried to draw down the funds and be all sad about it.

Questions? I thought I did a good job.

Yes, ma'am?

Female speaker: Thank you so much. What do you need to do about supplies?

MS. MALONE: Good question. For the most part, I believe – and Meron, you can correct me if I'm wrong – I think supplies should be accounted for in your budget. Now, I think the concern with supplies is if you go out and try to amass a whole bunch of supplies at the end of the grant award to try and spend whatever funds are left in there, we're going to look at that as equipment, so you're going to need to report to us why you needed $5,000 worth of pens.

If you can justify it, we might let it go. But don't do it. Good point. But that was a good question because, really, sometimes people may look at it as supplies and figure, okay, well, we don't have to report on it, and I think we may have had some issues in the past where some – I'm not going to mention anybody – but may have tried to take advantage of the situation and, yes – these are government funds. Hopefully they're being used to benefit all the society, so we want to just be the best stewards that we can be.

Any more questions?

MS. : You referenced leveraged funds. I thought there was a difference between leveraged and matched dollars. Your leveraged funds you don't necessarily need to report on, but matched you did. The way you talked about it, you did need to record leveraged. Do I have that backwards?

MS. MALONE: OK. There is a difference.

MR. : (Inaudible.)

MS. MALONE: OK. Yes, sir.

MR. : Thank you very much. Gregory, welcome back to the mic.

GREGORY: OK. So it was the flashiest presentation. If I'm not mistaken – I don't have the – (inaudible) – right in front of me – but I'm pretty sure that we require that you need to be reporting leveraged costs on SWFI and America's Promise Grant. It's not option.

If matched and leverage is different, there are different requirements around how you have to track them, how you have to report them, and also the consequences if you do not meet those. Leveraged is less rigorous, but you are in fact required to report leveraged. If you have not been or if you have not been tracking it, you need to stop and think about your grant.

MS. MALONE: I only saw two hands. Are we good to go?

MR. : Hi. Is there a place where they give a sample of the end-user guide that's used for closeout prior so they can take a look at it and get some ideas?

GREGORY: I believe we can –

MS. : Yes. It's on the Internet and what we can do, we can send you the link. We'll send the link to the program office if they have a mailbox. On the Internet you can access the manual guide and you'll be able to go through before you get – (inaudible).

MR. : (Inaudible).

MS. : It's the same. We haven't changed. We haven't changed the system yet. We're working on it.

MS. MALONE: All right. Once again, any more questions? Excellent. Excellent. I do thank you for your time. I thank you for attending.

Hopefully you all got something from this presentation that will assist you in the proper preparation for closeouts.

ADRIAN BARRICK: OK. Good afternoon, everyone. Hello out there. How are you doing? I'm going to be very brief because I think this is the coldest that I've ever been inside, so I'm going back down south as quickly as possible to region 3. This is going to be brief and it's going to be more interactive, etc. I'm going to talk about period of performance extensions.

Avery touched on a lot of points. He talked about boxing. I'm going to go with Purple Rain, all right? Now, you remember Morris Day in the time from Purple Rain? OK. I've got one slide. That makes me Jerome the hype man with the mirror. Avery is Morris Day.

Anyway, with that said, we're going to sort of backtrack and I'm not going to turn this into a whole grants management sort of seminar because we don't have the time. This is sort of a preface to the no-cost extensions, etc. It has to do with grant planning. Every grant that ETA puts out requires – you have sort of your timeline and these kind of things that they're part the grant. That's a very, very important part of the document.

I'm going to use an analogy. You're in the business of – let's say, we're going to use a really big, crusty French bread, right? OK? That's your budget, all right? You're doing grant working and you're doing great work, etc., and you've got like really rough saw and you don't have time to necessarily pick the crumbs up, etc., but you have to pay attention to those crumbs, okay, because those are dollars and cents.

What you need to do, just every now and again, but make it a routine part of your practice, is stop sawing or have somebody else collecting those crumbs, and you need to start thinking, not just about the baskets of bread; you've got to start a side crouton business while you're at it. Does that make sense?

Because those dollars and cents that in categories – and the main culprit is going to be that there's been a time lapse. You were trying to hire someone on day 60 and it took an extra 30 days or something, that's money that you need to be thinking about constantly, about sweeping up those crumbs and repurposing them within the purviews of the grant agreement and making sure – obviously, they have to allowable and applicable expenses.

If you've done all of those things and you're keeping track of the money that you're spending vis-à-vis the time that is lapsing, you should be in pretty good shape. But things get away. Things happen. There are lapses, market conditions change. You hear grantees in a great economy saying that it's challenging to find the participants.

But, actually, macro is a good problem to have, but micro, as far as the grant is concerned, it's a problem that you have the resolve and solve because it's a contract and we're going to hold you to it.

When we come out to visit you – you know, I like to say that we're like at a kindergarten school play; we're only looking at our kid. You know what I mean? Whatever else is going on in your life, we're looking at our kid, right.

With that said, when you reach the point where for whatever reason you feel that you need a period of performance extension, there are levels. The best no-cost extension, the sort of, like, the premium one, is that you've met and exceeded all your goals and you have funds left over because you've been very judicious about extending funds and you want to do more. That's an easy one, right?

But then, after that, like, sort of tiers down you have to do things like, basically flood happens and there's a lag in hiring, you didn't get equipment on time or just sort of just things that we're used to seeing and hearing as FPOs, etc.

There are other considerations also. The amount of time that you can have in a no-cost extension, depending on sort of the grant and the legislation that's controlling; some money has a firm time limit, others are more flexible as far as time is concerned.

Another consideration to take into account would be when the program office will consider those no-cost extensions. There are regional modifications, but we get our cues from the program office as to when it's appropriate for you to follow the no-cost extension. All right. Any questions?

MS.: (Inaudible).

MR. BARRICK: OK.

MR. : What is that time for the no-cost extension? What is, like, the best time – (crosstalk) –because for us, we're in a position where we're going to – (inaudible).

GREGORY: Basically, you can ask for a no-cost extension about two-thirds of the way into the grant you guys have already past that point, so you're considering and asking for – we call them no-cost, but now we're calling them period of performance extension – period of performance extension. Anybody in this room can ask for one now. Those go through your FPO and occasionally come to us if there are questions or we need to talk something through.

MS. : (Inaudible).

GREGORY: You can't ask for it when less than 60 days is left in your grant. In other words, specific things that we can touch on, there's lots of consideration; there're many reasons to ask potentially for a no-cost extension. Adrian touched on some of the more obvious and typical ones, but the thing is we do want you to have a strategic reason for why you're doing it.

You don't just ask for it because we can ask for it. You need to come in, you need to have a justification, you need to have a plan – you may have to do a budget alignment to sort of make things work as you're extending out. You're not going to get more money for this, that's part of it, but you're going to have to use what you've got remaining.

I will say our internal policy is that the FPOs ultimately have the say over that. If they approve it, the program office is going to support that; if they don't approve it, we will come back, we'll look at it, and just evaluate, make sure that we're all on the same page with it that.

What I'm trying to say here is that we are very open to the notion of no-cost extensions or a period of performance extension, but you do have to have a good, solid justification and a plan to go along with it. Sorry.

MR. BARRICK: No worries.

MR. : Just a follow-up, how long does it take for you guys to review an extension request?

MR. BARRICK: You know what? We're all human beings, so basically we try to get it from start to finish, in and out the door within the 30-day period. It's a matter of – okay, so there're some mechanics to no-cost extensions that you should be aware of. Generally, you're going to have your letter from your signatory, not your contact, not your – the other person that has to be the unit grant signatory.

The components, basically, with no-cost extension are going to be your strong justification, etc. your year-to-date performance measures because if that's a factor, we need to know where you're at and then your plan – an extension or your grant – (inaudible) – that's in your grant agreement, you need to show us what you're going to do, you need to put a time that you're requesting, right.

Generally, you have up to a year. You can have an extension up to a year, depending on your own – across most grant programs.

But you need to consider – again, back to the breadcrumbs – whether you're going to have the funds to sustain your no-cost extension because it literally is a no-cost extension, and whether or not give you're going to be able to, at the end of the day, basically total your obligations that you're agreeing to because if you extend and then you don't meet your obligations, again – and with past performance being a thing, you could basically sort of put yourself in a less advantaged position as a grantee.

Does that answer your question?

MR. : (Inaudible).

MR. BARRICK: OK. Great. Yes. So, once you have your – here's the tip: don't sort of hand in a failure to complete no-cost extension. Yes. We've got the perfect, no issues, signed by the signatory, etc. and send it to us because if there are issues, it has to be undone and redone, and that wastes – it's not ideal because we can imagine you marching into your executive director or your president's office to say, "It's me again. No-cost extension." It's not a good look.

CLAY: Hi, Andre. This is Clay, region five. The grantees put me on the spot in one room and I kind of misspoke a little bit, so I'm going to clarify a little bit here. One thing – I'm going to go back to it – talk to your FPO and talk it through. It should not be a surprise, like Adrian is saying, "Oh, I got money at the end." That should not be a surprise.

What I wanted clarify is something that was said earlier. Can you enroll participants after you enter the grant or can you do a no-cost extension? Well, in region five, when you fill grants there's a mandatory follow-up period; you cannot do it across. That's across the board. For reentry grants, you cannot do it because you have a mandatory follow-up. So, what I want to ask Greg is, is that a possibility from H-1B, because it's a bit more flexible, to possibly enroll someone after the end of – during a no-cost extension?

GREGORY: Yes. With H-1B, you may certainly do any of the services that you would otherwise be doing in that period of performance of extension. That being said, I mean, you have to do it again strategically, which is that you're not going to start putting people in that you know that you can't see to the other side or that you don't have a plan for after the funding runs out, after your staff is gone, or whatever, and you've moved on and you've sustained it in some other format.

Again, you can do it, and we certainly want to encourage people. I mean, obviously those of you that are – and the way, as you're tracking your outcomes and making sure that you're doing all the things you said you'd do, you may start people and they may get credentials.

You may not see them through to get employment and things like that when you start enrolling them late into the process, but we don't discourage you from doing that if you can pick up as many of those outcomes that are of benefit to you and that you have a plan for your participants through the end of the grant.

MR. : Part of that plan would be having the budget show us how you're going to spend – (inaudible) – and just taking everything through.

MR. BARRICK: I think we sort of covered the basis. There was extra point that sort of needs to be touched on and it has to do with the use of the budget lines item flexibility rule, which ties into eventually into closeout, etc. Be very careful with that. Whatever you decide to do, if you decide – you have the right to exercise the rule.

You just be in contact with your FPO regarding it, because what will happen and does happen sometimes is that we'll come out to visit and – you're grant agreement is yours and we're expecting to see word for word what's under the latest approved thing and you guys have gotten jiggy with it (sic) some kind of way and you've done these different things that you were entitled to do, but we don't know that, right.

Best case scenario is then you say, "OK. Oh, we have an updated budget at narrative. Sorry. We didn't send it to you. Here it is," and we're back on board. What has happened more often than should is that you lost track of the budget line flexibility and then knowing you can explain to us on-site how you got to where you are right now since you walked off the reservation of the approved budget, and that becomes problematic because it sort of compounds on itself and then when it gets to closeout, the question mark just keeps getting bigger. That's the pro tip that I'm going to leave you with.

Do you have any questions? OK. Well, thank you very much.

There's a question. OK.

MR. : On a budget revision, does it matter – you obviously would be moving from categories to it, so you'd be taking some training money to be used for maybe cast management or administration, obviously because you're running out of categories with the – on that money left in God knows what category within no-cost extension. Is that acceptable? Then, secondly, if your federal program officer didn't approve, is there a way to appeal it here?

MR. BARRICK: OK. Let's go back to your –

MR. : I've never met my federal program –

MR. BARRICK: Right. I understand. Let's go back to the first part of your question.

MR. : (Inaudible) – category.

MR. BARRICK: Yes. You have to be very careful and some grants have restrictions. They used to be under Uniform Guidance, those restrictions were sort of loosened, but you really have to be careful and really keep accurate track of it. As a courtesy and actually as a safeguard I would send an updated budget narrative with your new figures within to your federal project officer.

And also the backup for that, whether it's Excel spreadsheet or whatever it is you use to keep track. You need to have that because we're going to ask, "OK. I know the last report said X, but what's the weather today financially," right. And if you're having an – (inaudible) – it's not a good luck. All right? So, make sure that you keep to the penny track, no rounding, no nothing; it is what it is.

As far as the second part of your question, could you repeat it again?

MR. : If your federal program officer didn't like something, does it go here for an appeal if they didn't approve?

MR. BARRICK: Well, they'll ask if we concur, right, and, generally, our lack of concurrence or concurrence won't be overridden. I'm sure there are special cases, etc., where maybe the program officer deems it necessary, etc., so I wouldn't say that's it's an absolute, etc. But, you know what? Any time you appeal to a higher court, it's not guaranteed that you're going to get – that you're going to win on appeal. I'll put it that way.

MS. : When the FPO has approved it, how long before the program people release the approval? Then, do we get that in written form or an e-mail?

MR. BARRICK: Well, in the closeout context?

MS. : The extension.

MR. BARRICK: OK. The no-cost extension is a reasonable modification and, basically, sort of the chain would be once we think that it's ready, it gets then put into our system and goes through a series of approvals.

People – (inaudible) – workload issue or maybe – sometime recently we had situation where there was a technical issue. The person who was next in the approval chain didn't have access for some technical reason. There was something wrong with their – to access that system we actually have to use our DOL passes.

All right. So it could be some of those humans, etc., but ideally, if you get your modification in, right – and I don't know if any FPO is going to hold onto it until it's ready to go for more than a day or two.

MS. : (Inaudible)?

MR. BARRICK: Then it goes to management to be approved and then from management it goes to the regional ground officer, and they make the final determination, etc. From there, it goes to a grant specialist who will then look at it again and then input it into what we call our e-grant system, electronic grants management system, and then you'll be issued an official modification, right.

MS. : In e-mail or letter?

MR. BARRICK: Well, that will be sent to the signatory by e-mail, but one thing; your FPO may get a courtesy copy and, generally, as a matter practice if I get the courtesy copy even before the official, I will e-mail it to the grantee with the caveat that a more complete copy will be sent to them with attached documents, right.

GREGORY: Do I have it right, Adrian, that – I mean, we treated a period of – (inaudible) – like any other modification. You've all done budget mods. At this point you've all done – some of you have done scope of work mods. The process is exactly the same: you're putting a justification and you're submitting it to your FPO. They're going to their process and then they can go get a result.

MS. : Thank you.

MS. : Generally we say 30 days.

MR. BARRICK: Pardon?

MS. : Generally we say 30 days.

MR. BARRICK: Yes. Generally it takes 30 days. And I have to say this, since I have the floor, etc. I really appreciate the work that the grant specialist – everybody here, but especially the grant specialists here and the national office do because they are – you know what? They will run a comb through a bald head. They are detailed and we have come to really appreciate that in the regions. So I'm going to give you a shout out and I'm going to close on that note. Thank you.

GREGORY: Thank you, Adrian. Monica has just come to join us. We're going to the front of the podium now. That's how important it is. But, anyway, we wanted to thank you. Thank you for sticking with us. I know many of you are probably starting to think about heading out, getting to the airport or off to whatever else you're doing while you're here in the city.

But we really would like to thank all of you, first of all for being here. Just a great couple of days. Hopefully you felt like you've got a lot of out of it and things you could take back to your colleagues as you're thinking through your final year and potentially your final, final year if you decide to ask for a period of performance extension.

I think we want to sure – well, actually, no; what we would like to do first off is just take a moment and say was there anything anybody would like to comment on or any takeaways that they wanted to share with the group before we do a few last closeout things?

MR. : Very good. Very – (inaudible). Thank you.

MS. ANTONIO: OK. I have a couple that I will share that our TA providers provided us with, as well as some of the sessions that I went through. Around business engagement, one of the things – a key takeaway was if you don't think business engagement is a major part of your work, you won't do it well. For effective business engagement you must listen. You have to focus on needs and solutions, and don't search for problems to fit your solution.

Someone paraphrased, I think Zig Ziglar, saying, "Through helping people get what they want, you can get what you want," which is, of course to serve employers and just also serve our communities through providing these jobs and job training.

I'll just say one more. SWIFI and AP grantees have much in common. They face similar challenges but have developed strategies that can be used across grant programs to overcome those challenges. Sharing with peers in their own grant program and across the two grant programs has been the highlight of the convening.

I think we all echo that we just – this was an experiment in a way because I don't think we've ever done this with H-1B we've always had separate convening, but we thought it would be useful and beneficial to all of you to kind of come together and to learn from each other, and I think I've seen a lot of that learning throughout the past couple of days.

Then one of the things we said we wanted to make sure that you all keep doing after this convening is communicating it. You had an opportunity to network with people. Continue to communicate with people and share those best practices.

Also, communicate with us. Share with us the best practices, any questions that you may have throughout the next few months of your program or, if you have an extension, throughout that next year. Just keep those lines of communication open. What we really want to do is do the work here. These are like demonstration grants. We want to be able to show the workforce system the good work that you do so that they can replicate that.

GREGORY: Finally, just again, it takes many, many people to put this together. We had two grants. We had two different TA providers. We want to thank Hef (sp) for helping doing the logistics and also a lot of us the programmatic stuff, especially Angela Brown for really spearheading the whole conference.

MONICA E. ANTONIO: Can we give her a hand?

GREGORY: Yes. We'd also like to thank Mathematica, of course, who was responsible for many of the programs as well and was super – (inaudible). We had lots federal support from all our federal colleagues, our grants office, our FPOs. It takes everybody to put something like this together.

MS. ANTONIO: Absolutely. One for announcement, if you have not done so, please fill out your evaluation forms for day two. We have people at the exits that will collect them from you.

I think that's about it. I don't know if we have any final words. I see Robin Fernkas is here.

MR. : I would also just – remember as was just mentioned, we will post all of the materials on the COP. There will be resource on WorkforceGPS for the conference, so look for that and, certainly in the interim, if there's anything that we can help provide coming out of this, we're happy to give that to you.

MS. ANTONIO: Thank you, everyone. Safe travels.

OPERATOR: The leader has disconnected. This conference will now end.

(END)