



**1. Where can grantees find the WIA youth eligibility documentation criteria if they are interested in co-enrolling youth in WIA?**

US DOL allows states flexibility in how they determine eligibility for WIA. Grantees should look for documentation criteria on their state's labor agency Web page. *WIA State Office contacts link:* <http://www.doleta.gov/usworkforce/statecon.cfm>

**2. What documentation is acceptable for the category child of an incarcerated parent? Is a self-statement or a statement from another relative valid?**

Participants should provide documentation from the institution or from the court to verify current or previous incarceration of a parent. If that document is not available, self-attestation by the youth can be accepted.

**3. HUD allowed a certain percentage of participants to be enrolled who already had a GED or high school diploma. Does DOL have a similar policy? Can we accept participants in these categories as long as they are enrolled in other education 50% of the time?**

Yes, there is a 25% exemption. Grantees can enroll youth who have a GED or high school diploma already (up to the 25%) but these youth MUST STILL be basic skills deficient.

**4. Our application stated that the program would operate in a specific city location. Are we allowed a certain percentage of participants from outside that specific area (i.e. City vs. County?) If so, what is the exception cap? (HUD had a percentage cap.)**

DOL does not stipulate a minimum or maximum distance for recruiting youth.

**5. Regarding the ETA-9130, when entering the match amounts, is the entered amount the percentage of the total match broken down for the quarter or period, or the entire match, or the part of the match that has been used in the period?**

The grantee should record the total amount of match spent in the quarter on line 10K – “recipient share of expenditures.” Line 10J can be reported in two ways. Grantees should select one and stick with it for the life of the contract. One: Grantees divide the match between the proposed two years. After the match is split, Line 10J lists the portion of the match submitted on form 424A allocated by the grantee to Year One. In Year Two the remaining amount from 424A is listed on line 10J. Grantees should be careful that the amounts from Year One and Year Two total the amount submitted on form 424A. Two: Grantees report on the total amount submitted on form 424A for the entire life of the contract. Thus, the sum of the amounts placed on line 10.J (total recipient share required) for the two reports must equal 100% of the match shown on the 424A. In either case, the amount is not split into quarters.

**6. Can DOL provide further clarification about where to report matching and leveraged funds on the ETA-9130?**

Grantees should follow these guidelines:

- a. Grantee or sub-recipient expenditures for allowable costs paid for with non-federal funds or received as a third party in-kind contribution to the program are reported on line 10k of the ETA-9130. The amount reported on line 10k *in excess of* the amount of match required is reported on line 10j (and becomes the first component of leveraged resources).





- b. Grantee or sub-recipient expenditures of other federal grant funds for allowable costs that could have been paid for with the YouthBuild grant are reported on line 11a of the 9130.
- c. Expenditures by a partner organization [not a sub-recipient] of other federal grant funds to support the activity of the YouthBuild grantee [e.g., the local One Stop co-enrolling participants and paying their supportive services with WIA youth funds] are not reported on the 9130 but only reported on the narrative progress report.
- d. Expenditures by a grantee or sub-recipient which are in support of the YouthBuild program on costs that would be allowable under the OMB cost principles but are not allowed under some grant or program restriction [e.g., the cost of buying the land on which a house is built by participants] are not reported on the 9130 but only on the narrative progress report.

**7. Do grantees that have sub-contractors have to re compete the sub-contract competition after grant award in order to assure DOL that the sub-contract was awarded fairly through a competitive procurement process? What rules govern this?**

The Uniform Administrative Requirements require that all procurement transactions be conducted in a manner that promotes free and open competition and adherence to state and organizational procurement standard and processes. Utilization of one of the methods specified in 29 CFR 97.36(d) and compliance with the additional process requirements will satisfy the requirement for competition. There are four (4) methods specified and these methods cover most situations faced by a grantee in the procurement of both goods and services, including the appropriate use of non-competitive procurements. This means that for services to be provided under the grants, or for goods acquired for grant use, the procurement process must be followed and such actions documented. There is **one** exception to this requirement for those organizations meeting the definition of a partner organization. ETA has consistently held that for those organizations meeting the partner standard, no Federal procurement process would be required. A partner organization must have been a “partner” in the development of the application and subsequent to the grant award. It is an organization whose absence would lead to non-performance or failure.

Partner activities are those specified in the original Statement of Work. Should additional projects emerge, those partners would not receive preferential treatment in the implementation of such activities. The new activities are then subject to the procurement requirements specified in the Uniform Administrative Requirements.

**8. How can I locate the low-income threshold for the area my YouthBuild program is serving?**

HUD has a Web site tool that allows you to select the state and county in which you are operating and it will demonstrate the 80% low-income threshold for different family sizes. Please see this link: [http://www.huduser.org/datasets/il/il2008/select\\_Geography.odt](http://www.huduser.org/datasets/il/il2008/select_Geography.odt)