



U.S. Department of Labor
Employment and Training Administration
Region 2 - Philadelphia

Discretionary Grantee Conference

Keeping in Compliance

Presented By:
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Making Your Project Yield Good Jobs for Everyone



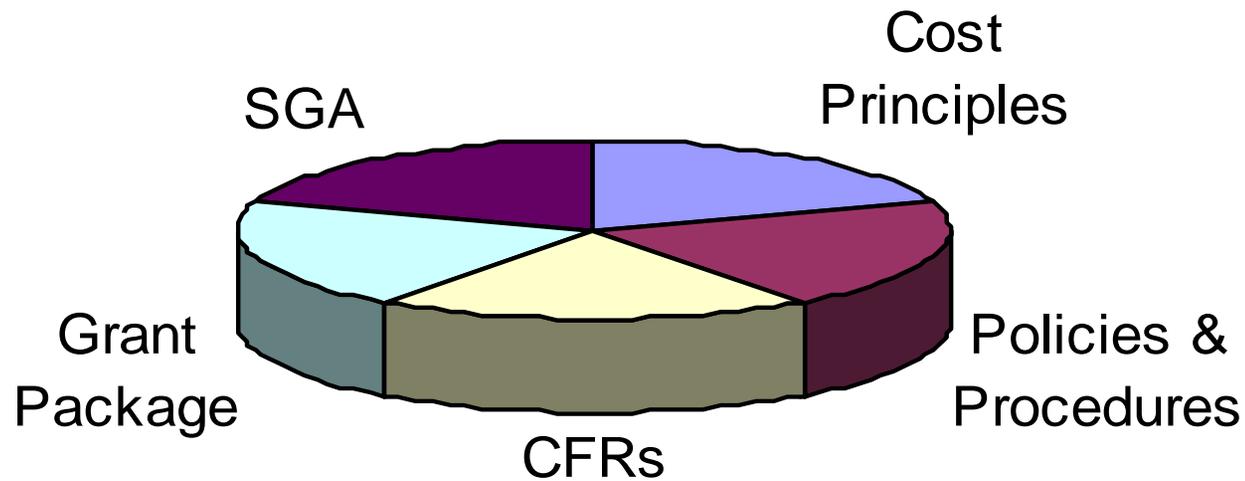
Maintaining Compliance Throughout the Entire Grant Cycle



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The Pie of Compliance



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CFR, OMB, SGA...ALPHABET SOUP...

CFR: Code of Federal Regulation. These are the uniform administrative requirements that set forth minimum expectations for federal grants. Applicable to DOL are 29 CFR Parts 95 and 97

OMB Circulars A21, A87, and A122: These discuss whether cost items are allowable, unallowable, or allowable with conditions

SGA: This is the Solicitation for Grants Applications. Your Statement of Work was written in response to this, and it outlines items such as funding restrictions, further eligibility restrictions, and other requirements

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Pre-Award

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Statement of Work

Responsive to the Solicitation for Grant Applications

Contains

- ✓ Eligible Participants to be Served
- ✓ Timeline
- ✓ Budget
- ✓ Partners
- ✓ Services to be performed
- ✓ Performance Goals

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Post-Award

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As a DOL-ETA grantee, we expect you to adhere to your Statement of Work, *as written* unless a formal modification is asked for.

Your quarterly reports should reflect your progress towards achieving your goals as outlined in your Statement of Work.

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When to Request a Modification?

- ✓ Change in scope or objective
- ✓ Change in key personnel, *specified in grant award*
- ✓ Change in budget
- ✓ Change of partners
- ✓ Change in period of performance



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POP QUIZ

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Q. The Executive Director resigns and you hire a new one. Do you need a modification?

A. Only if the Executive Director is specified in the Statement of Work.



Supplies & Equipment

What's the difference, and why is it important?



Equipment

- ✓ Single Item
- ✓ Greater than \$5,000
- ✓ Tangible
- ✓ Useful life greater than One Year





If the item in question meets the criteria listed...

**GRANT OFFICER
APPROVAL IS NEEDED
PRIOR TO PURCHASE.**





Things You Need to Know

- ✓ Associated Costs
- ✓ Allocability
- ✓ Fee for Use
- ✓ Tracking



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Supplies

- ✓ All tangible property



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Q. Your program purchases \$5,000 in computer software. Do you need prior approval?

A. No, software is not tangible.



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Money Matters!



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A grayscale illustration of two hands in business suits exchanging a stack of money. The top hand is handing over a stack of bills, while the bottom hand is receiving them. The bills are depicted with dollar signs and are slightly blurred to suggest motion.

Cash Management

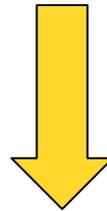
Acceptable Methods

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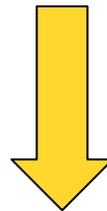


As Needed

Incur Costs



Draw Down Funds



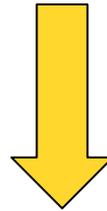
Pay Costs

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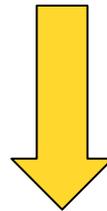


Reimbursement Method

Incur Costs



Pay Costs with Own \$



Draw Money, Reimburse

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Things To Consider

- ✓ What Method is Right for Your Organization
- ✓ Minimal Time between Transfer of Funds
- ✓ No Cash on Hand

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Allowability

- ✓ Consult Appropriate Circulars
- ✓ A21, A122, A87



The **Big Three**

NECESSARY

REASONABLE

CONSISTENT

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Allocability

Paying our Proportional Share

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How many grantees have multiple direct funding streams?

How many staff members split their time between different projects?

How many of your participants are enrolled in multiple programs?

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How Can You Determine Your Proportion?

- ✓ Usage Log
- ✓ Timesheets
- ✓ % of Participants

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Procurement

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Competition

“All procurement transactions shall be conducted in a manner to provide, to the maximum extent practical, open and free competition...Awards shall be made to the bidder whose bid or offer is most responsive to the solicitation and is most advantageous to the recipient.”

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Conditions for Sole Sourcing

- ✓ Provider is the sole source of the supply
- ✓ Competition fails to yield more than one offer
- ✓ Emergency/Exigency
- ✓ A supplier has a unique capacity to economically provide the services or supplies



Procurement Records at a Minimum Must Include...

- ✓ Basis for Contractor Selection
- ✓ Justification for Sole-Source Procurement
- ✓ Basis for Award Cost or Price



Contracting

Grantees are responsible for:

1. Holding Sub-Contractor Responsible
2. Monitoring Sub-Contract
3. Establishing a System of Reporting

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Reporting

All grantees are responsible for two types of reporting - **Performance & Fiscal**. Reports are typically due 45 days after each calendar quarter.

Draft ARRA 1512 reports are due 10 days after quarter end.



Financial Reporting Requirements

- ✓ 9130 Report

Performance Reporting Requirements

- ✓ Narrative Report

Note: Other reporting requirements will vary by grant award. You should reference your grant award package for further clarification.



Record Keeping

- ✓ Record should be maintained for 3 years after date of final expenditure
- ✓ Financial & Program Records
- ✓ Supporting Documentation
- ✓ Other Records - Pertinent to Grant
- ✓ Apply equally to Grantees & Subgrantees





Access to Records

Who...

- ✓ DOL
- ✓ Comptroller General
- ✓ Grant recipient
- ✓ Director, Office of Civil Rights

What...

- ✓ Books
- ✓ Participant Files
- ✓ Documents
- ✓ Papers
- ✓ Other records

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Close-Out

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During Close-out you should perform the following:

- ✓ Liquidate all obligations incurred during the grant period
- ✓ Submit all required reports
- ✓ Refund any obligated funds/cash
- ✓ Account for all real or personal property
- ✓ Completed 90 days of expiration of grant period

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Repercussions of Non-Compliance

- ✓ Restricted draw downs
- ✓ Disallowed costs
- ✓ Termination of funds
- ✓ Legal actions

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POP QUIZ

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Q. You are a Program Manager for a Community College who is looking to begin equipping your program, purchasing the items with grant funds. You have several questions to the allowability of some of the items planned to be purchased. What document can give you guidance?

A. OMB Circular A-21. If you have further questions, contact your Federal Project Officer for assistance



Q: A medium sized non profit, has decided to incur and pay for grant costs, and reimburse themselves on a monthly basis. Some months, the costs exceed \$50,000. Is this an acceptable cash management policy?

A: Yes. Per CFR 29 Part 95, this meets acceptable cash management policies.



Q: A new grantee provided a list of the equipment that it will buy with grant funds in their application. Since this was included in the approved grant award document, they can go ahead and buy the equipment without further notification to USDOL.

A: No. Prior Grant Officer approval must be obtained for purchase of any equipment with a per unit acquisition cost of \$5,000 or more and a useful life of more than one year



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Questions

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Thank you.

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