



U.S. Department of Labor

VETS' Guide to Competitive and Discretionary Grants



April 2003

**Veterans' Employment
and Training Service**

The *VETS' Guide to Competitive and Discretionary Grants* was prepared by the Veterans' Employment and Training Service, with assistance provided by Abt Associates Inc., under Contract GS10F0086K, Purchase Order B9523912, and is current as of April 2003. Changes in program requirements or additional guidance published in the annual Solicitations for Grant Applications will modify the content of this Guide.

Contents

Chapter One: Introduction and Overview of the VETS Grant Process	1
1.1 Introduction to the VETS' Guide to Competitive and Discretionary Grants	1
1.2 How to use the VETS' Guide to Competitive and Discretionary Grants ..	3
1.3 Guidance for New Applicants	3
1.4 Overview of the U.S. Department of Labor and the Veterans' Employment and Training Service.....	4
1.5 General Features of the Grant Application Process	7
1.5.1 The VETS Grant Cycle	8
1.5.2 Review of Application, Grant Award and Grant Start Up	9
1.5.3 Ongoing Monitoring of Grant Activity	10
1.5.4 Grant Modifications.....	10
1.5.5 Availability of Technical Assistance.....	11
1.5.6 Addressing More Persistent Problems.....	11
1.5.7 Grant Close out.....	12
Chapter Two: Background and General Information on HVRP	14
2.1 Purpose and Overview of the HVRP Program	14
2.1.1 Program Mission and Basic Objectives	14
2.2 Eligible Applicants and Participants	15
2.2.1 Eligible Applicants and Jurisdictions	15
2.2.2 Participant Eligibility.....	16
2.3 Types of Services that HVRP Can Fund	17
2.3.1 Emphasis on Achieving Results.....	21
2.3.2 Related HVRP Program Development Activities	23
2.4 Rating Criteria for Awards	24
2.5 Summary	25
Chapter Three: The HVRP Grant Application and Award Process	26
3.1 Special Guidance for New and Existing HVRP Applicants.....	26
3.2 The HVRP Application Process.....	28
3.2.1 Solicitation for Grant Applications (SGA).....	28
3.3 The Technical Proposal.....	30
3.3.1 Transmittal Letter.....	30
3.3.2 Preparation of Part I – Technical Proposal.....	30
3.3.3 Additional Notes on the Program Narrative: Other Things to Keep in Mind.....	37
3.4 Guidance on Preparing Part 2 – Cost Proposal	38
3.4.1 Cost Principles for Development of Cost Proposal.....	38
3.4.2 Guidance on Completing the SF-424.....	41
3.4.3 Guidance on Completing the SF-424A.....	42

3.4.4	Guidance on Preparing the Budget Narrative.....	42
3.4.5	Guidance on Completing the Assurances and Certifications Signature Page.....	43
3.4.6	Final Proposal Checklist.....	44
3.5	Special Guidance For Existing/Repeat Grantees	44
3.6	Application Submission Procedures	45
3.7	The Application Review Process	45
3.8	Post Award Conference	47
3.9	Summary	48
Chapter Four:	Background and General Information on VWIP	50
4.1	Purpose and Overview of the VWIP Program.....	50
4.1.1	Program Mission and Basic Objectives	50
4.2	Eligible Applicants and Participants	51
4.2.1	Eligible Applicants and Jurisdictions	51
4.2.2	Participant Eligibility.....	52
4.3	Types of Services that VWIP Can Fund	53
4.3.1	Emphasis on Achieving Results.....	57
4.3.2	Related VWIP Program Development Activities	59
4.4	Rating Criteria for Awards	60
4.5	Summary	60
Chapter Five:	The VWIP Grant Application and Award Process.....	62
5.1	Special Guidance for New and Existing VWIP Applicants.....	62
5.2	The VWIP Application Process	64
5.2.1	Solicitation for Grant Applications (SGA).....	64
5.3	The Technical Proposal.....	66
5.3.1	Transmittal Letter.....	66
5.3.2	Preparation of Part I – Technical Proposal.....	66
5.3.3	Additional Notes on the Program Narrative: Other Things to Keep in Mind.....	73
5.4	Guidance on Preparing Part 2 – Cost Proposal	74
5.4.1	Cost Principles for Development of Cost Proposal.....	74
5.4.2	Guidance on Completing the SF-424.....	77
5.4.3	Guidance on Completing the SF-424A.....	78
5.4.4	Guidance on Preparing the Budget Narrative.....	78
5.4.5	Guidance on Completing the Assurances and Certifications Signature Page	79
5.4.6	Final Proposal Checklist.....	80
5.5	Special Guidance For Existing/Repeat Grantees	80
5.6	Application Submission Procedures	81
5.7	The Application Review Process	81
5.8	Post Award Conference	82
5.9	Summary	84

Chapter Six: Discretionary Grants.....	85
6.1 Overview of Discretionary Grants	85
6.2 Eligible Applicants And Grant Cycle	85
6.3 Technical Assistance To Applicants And Grantees	87
6.4 Program Monitoring.....	87
6.5 Summary	88
Chapter Seven: Reporting and Grant Monitoring	90
7.1 Grantee Reporting Requirements	90
7.2 Grant Monitoring	93
7.2.1 Desk Reviews.....	95
7.2.2 Monitoring Visits	96
7.3 How Grantees Should Prepare for Monitoring Visits.....	99
7.4 Monitoring Findings.....	99
7.5 Technical Assistance and Corrective Actions	101
7.6 Grant Modifications.....	103
7.6.1 Process for Modifying a VETS Grant.....	104
7.7 Sanctions, Penalties and Rewards	105
7.7.1 Withholding of Funds.....	106
7.7.2 Suspension of a Grant Program	106
7.7.3 Grant Termination.....	107
7.7.4 Imposition of Sanctions.....	107
7.7.5 Rewards	108
7.8 Grant Close-Out.....	108
7.9 Summary	109
Appendix A: Guidance on Completing SF-424	110
Appendix B: Guidance on Completing SF-424A.....	115
Appendix C: Allowable and Unallowable Costs.....	121
Appendix D: VETS Grantee Monitoring Instruments.....	125
Appendix E: Related Resources.....	138
Appendix F: Glossary of Terms.....	140



Chapter One

Introduction and Overview of the VETS Grant Process

This chapter provides an introduction to the Veterans' Employment and Training Service (VETS) Guide to Competitive and Discretionary Grants, including a brief description of each chapter and "tips" on how to use the Guide. The chapter also includes an overview of the U.S. Department of Labor and the Veterans' Employment and Training Service (DOL/VETS), and describes the VETS grant process and role of National, regional and state-level VETS staff in administering and monitoring grant programs.

1.1 Introduction to the VETS' Guide to Competitive and Discretionary Grants

The Veterans' Employment and Training Service (VETS) of the U.S. Department of Labor (DOL) developed the VETS' Guide to Competitive and Discretionary Grants as a resource for previous and new grant applicants, grantee organizations ("grantees"), and DOL/VETS staff involved in grant administration and monitoring. The Guide contains comprehensive background and application information for the competitively awarded Homeless Veterans' Reintegration Program (HVRP) and Veterans' Workforce Investment Program (VWIP), as well as information on discretionary, or non-competitive, grant programs offered by VETS. To assist grant applicants, the VETS' Guide describes the grant process for each program, and includes detailed instructions on preparing a grant application and suggestions for increasing the competitiveness of an application. To assist grantees, the Guide also includes guidance on reporting and monitoring requirements for VETS' grant programs. For DOL/VETS staff, the Guide is a valuable tool in administering and monitoring grant programs, as it provides an overview of the grant review process and criteria for each program, and explains the procedures for ongoing monitoring of grantees.

The information presented in the VETS' Guide to Competitive and Discretionary Grants is based on Federal Law, Department of Labor regulations, and previous Solicitations for Grant Applications (SGA) for the HVRP and VWIP programs. It is important to note that the Guide is not a substitute for close reading of the published SGA for each program.

The VETS' Guide to Competitive and Discretionary Grants includes the following:

Chapter One – Introduction and Overview of the VETS Grant Process

Chapter One provides an introduction to the VETS' Guide to Competitive and Discretionary Grants, an overview of the U.S. Department of Labor and the Veterans' Employment and Training Service (DOL/VETS), and a description of the VETS grant process.

Chapter Two – Background and General Information on HVRP

Chapter Two provides a more detailed description of the Homeless Veterans' Reintegration Program, including its purpose, background, scope of services, eligible program participants, eligible grantees, and criteria used for grant awards.

Chapter Three – The HVRP Grant Application and Award Process

Chapter Three describes the process for applying for HVRP funds, and includes guidance on the content of the grant application and completion of the proposal package. It further describes the application review process, grant award, and project start up, with special guidance for both new and existing HVRP grantees.

Chapter Four – Background and General Information on VWIP

Chapter Four provides a more detailed description of the Veterans' Workforce Investment Program, including its purpose, background, scope of services, eligible program participants, eligible grantees, and criteria used for grant awards.

Chapter Five – The VWIP Grant Application and Award Process

Chapter Five describes the process for applying for VWIP funds, and includes guidance on the content of the grant application and completion of the proposal package. It further describes the application review process, grant award, and project start up, with special guidance for both new and existing VWIP grantees.

Chapter Six – Discretionary Grants

Chapter Six outlines the process for applying for discretionary grant funding from the Veterans' Employment and Training Service, eligible applicants, technical assistance available to discretionary grant applicants, and criteria for grant awards.

Chapter Seven – Reporting and Grant Monitoring

Chapter Seven describes the DOL/VETS process for ongoing monitoring of grantees, including desk reviews of grantee information, on-site monitoring activities, technical assistance, and corrective actions. This chapter also contains information on the administrative and programmatic steps necessary to close out an existing grant.

Appendix A: Guidance on Completing SF-424

Appendix B: Guidance on Completing SF-424A


Appendix C: Allowable and Unallowable Costs




Appendix D: VETS Grantee Monitoring Instruments

Appendix E: Related Resources






Appendix F: Glossary of Terms

1.2 How to use the VETS' Guide to Competitive and Discretionary Grants

Throughout this Guide, you will see “light bulb” icons  that denote important information for the reader. Please pay special attention to these notes, as they provide essential guidance for VETS grant applicants, grantees, and DOL/VETS staff. Key information is also highlighted in text boxes throughout the document.

The VETS' Guide to Competitive and Discretionary Grants is available in electronic format on the DOL/VETS website at: <http://www.dol.gov/vets/>.  The electronic version of the Guide contains links that direct the reader to both internal and external sources of related information. Internal sources of information include other chapters and sections of the Guide, as well as the Appendices. These links are represented by the following symbol:  External links include relevant documents and Internet sites on the World Wide Web. These links are marked with the following symbol:  Readers may navigate these links to locate additional information by clicking on the symbol next to a key word or phrase highlighted in blue. In addition, there are two “buttons” at the top of each page that allow the reader to return to the Table of Contents or skip to the Glossary at any time. In turn, the Table of Contents contains electronic links to each chapter and section of the Guide.

1.3 Guidance for New Applicants

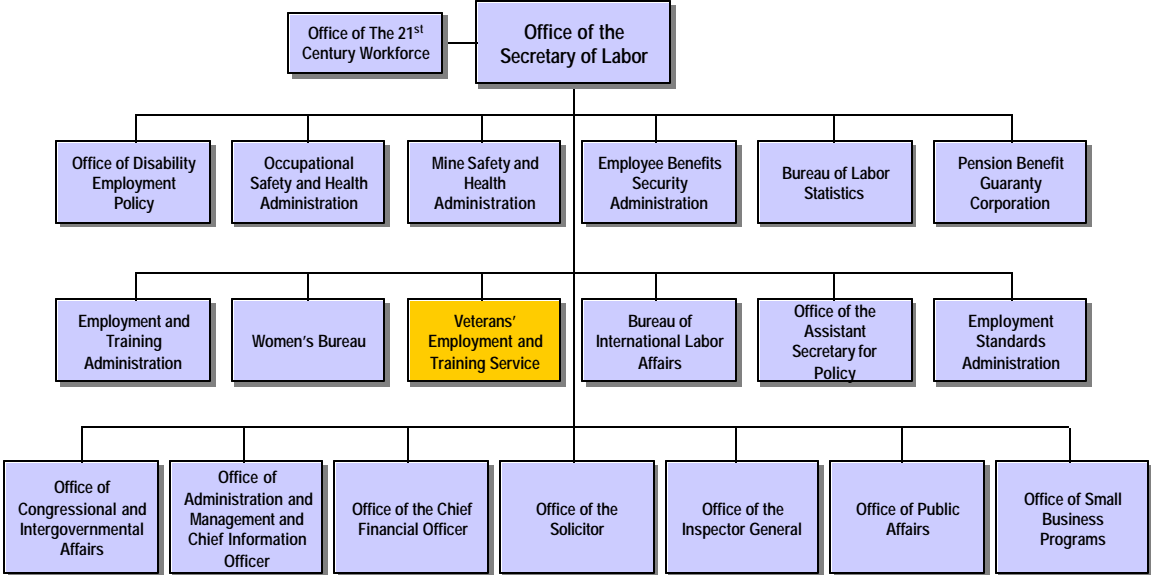
Organizations that have not previously applied for VETS grant funds are encouraged to read carefully the description of the VETS grant cycle in [Section 1.5](#)  of this Guide. New applicants may also find the background on HVRP and VWIP ([Chapters Two](#)  and [Four](#),  respectively) useful grounding in the required elements of these competitive grant programs and in the concept of a “results-oriented” program model. [Chapters Three](#)  and [Five](#)  contain further guidance on the application process for HVRP and VWIP, including how to

increase application competitiveness. In [Chapter Six](#), new grant applicants will find an overview of the application and award process for discretionary, or non-competitive, VETS grants. Finally, [Chapter Seven](#) acquaints the new applicant with the reporting and monitoring requirements for all VETS grantees. The Related Resources listed in [Appendix E](#) and the Glossary of Terms in [Appendix F](#) may be particularly helpful to applicants – both new and previous.

1.4 Overview of the U.S. Department of Labor and the Veterans' Employment and Training Service

The [U.S. Department of Labor \(DOL\)](#) is the Federal agency charged with preparing the American workforce for new and better jobs, and ensuring the adequacy of America's workplaces. The Department of Labor is comprised of several internal agencies including the [Veterans' Employment and Training Service \(VETS\)](#). (The chart below illustrates DOL's organization.) In operation for more than sixty years, the mission of VETS is to provide veterans with the resources and services to succeed in the 21st century workforce by maximizing their employment opportunities, protecting their employment rights and by meeting labor-market demands with qualified veterans. To accomplish this mission, VETS provides a number of training and employment services and funds grant programs targeted to veterans.

Department of Labor Organizational Chart



Overseen by the Office of the Assistant Secretary for Veterans' Employment and Training (OASVET, or ASVET), VETS administers both *competitive* and *discretionary* grants. The Homeless Veterans' Reintegration Program (HVRP) and the Veterans' Workforce Investment Program (VWIP) are two of VETS' competitively awarded grant programs. Grant funds available on a competitive basis are announced nationally and are available through an application process. In addition, discretionary grants are made available under VWIP at the discretion of the Assistant Secretary for VETS. Historically, discretionary grants have funded research, demonstration projects and evaluation studies, or have supplemented grants made under the competitive programs.

The Assistant Secretary for VETS must ensure, through the monitoring and oversight of grantee organizations ("grantees"), that funds are spent efficiently, effectively, and in compliance with all legislation and regulations. VETS oversees the administration of the competitive and discretionary grant programs through its network of national, regional and state level staff. VETS staff provide technical assistance, monitor grantee progress closely, and work with grantees to make any necessary modifications to Grant Agreements during the course of the grant period. In addition, VETS reports annually to Congress on grantee achievements and performance. The VETS office is committed to ensuring the success of its grant-funded programs nationwide.

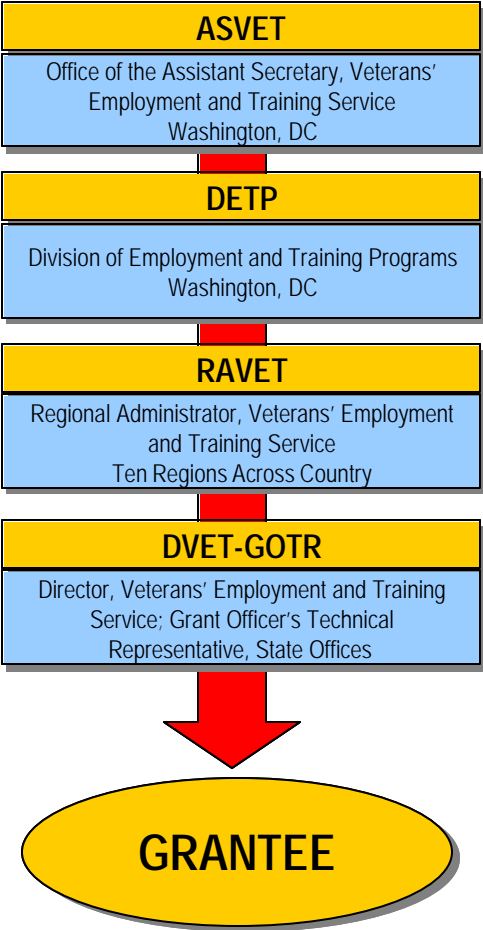
Each of the various levels of VETS staff plays an important role in the administration of the programs and the oversight of grantees. VETS national staff in the Division of Employment and Training Programs (DETP) has responsibility for the initial review and processing of all VETS grant program documents submitted to the VETS national office. In addition, national staff provide oversight for the grant programs. VETS regional staff are divided among ten regions nationwide and are overseen in each region by the Regional Administrator for Veterans' Employment and Training (RAVET). The regional staff are responsible for ensuring the timely and accurate administration of grant programs within each of their regions. The RAVET completes quarterly reviews of all financial and technical performance reports submitted by grantees. The RAVET can then ensure that technical assistance is provided to grantees where necessary, and that Grant Modifications or corrective action take place in a timely manner.

The state level Director for Veterans' Employment and Training (DVET) plays a key role in the administration of grants. In most cases, the DVET is appointed as the Grant Officer's Technical Representative (GOTR). In this function, the DVET/GOTR is responsible for monitoring a grant, providing technical assistance, identifying any instances of non-

compliance, and recommending corrective action (see the more detailed discussion of monitoring in [Chapter Seven](#) of this Guide).

The following organizational chart demonstrates graphically the organization of VETS as related to its grant programs.

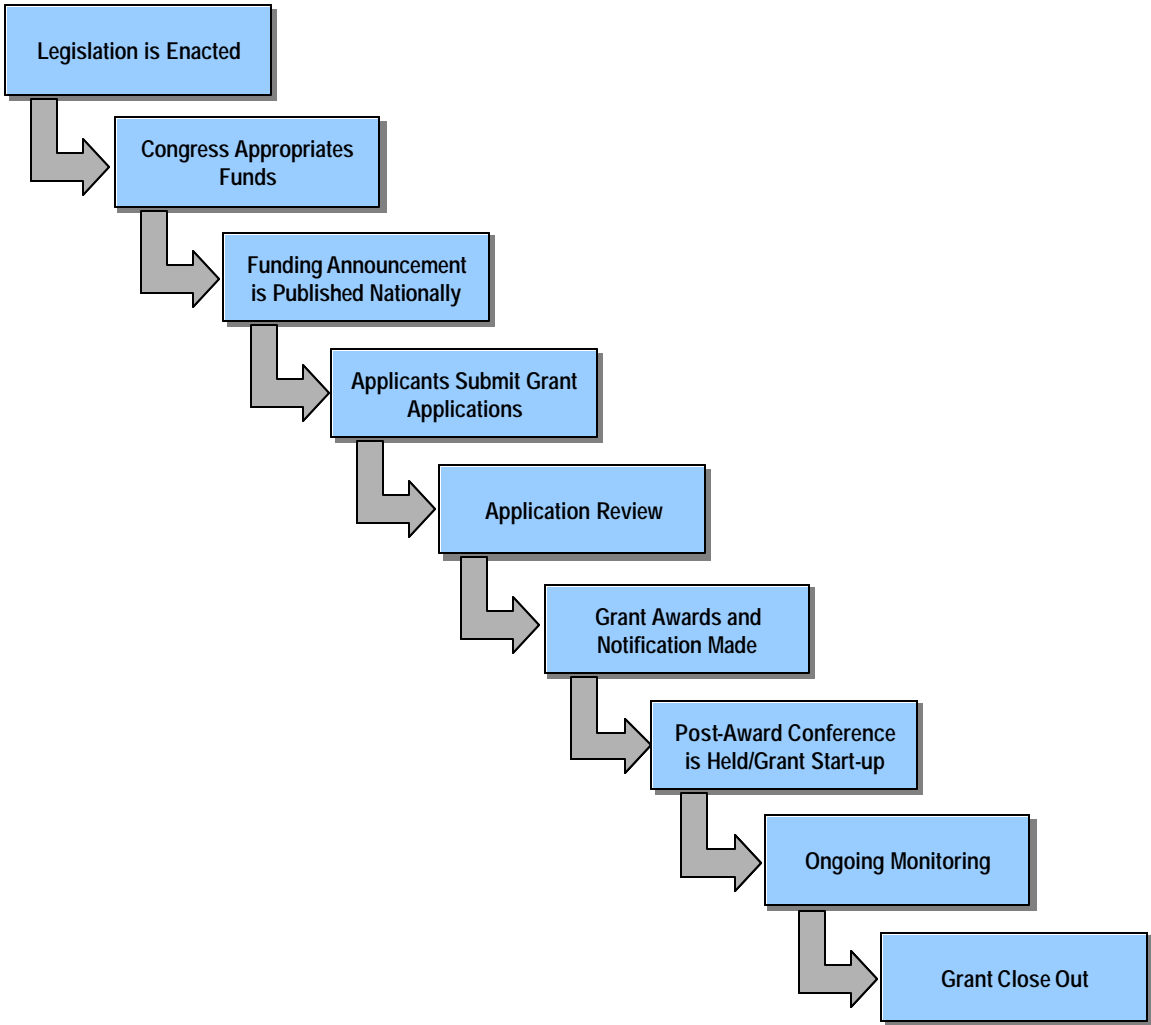
**Veterans' Employment and Training Service
Organizational Chart
(As related to Grant Administration)**



1.5 General Features of the Grant Application Process

Applying for Federal grants can be a complex process, especially for organizations that have little experience with such grant programs. This section of the Guide provides a brief overview of the grant application process (for both competitive and discretionary grants), focusing on the grant cycle, how grants are awarded and monitored, and grant close out. This section also addresses situations requiring sanctions, penalties or de-obligation of funding and opportunities for technical assistance for grantees. The following diagram illustrates the typical VETS grant cycle (the process is further described below).

Grant Cycle

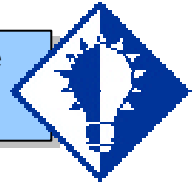


1.5.1 The VETS Grant Cycle

Each year, Congress assigns, or “appropriates” funds to DOL for grants to be awarded for employment and training programs. These funds are included in the DOL/VETS budget and must be awarded to grantees in the *program year* for which they were assigned, or returned to the Federal Treasury. The “program year” runs from July 1 through June 30.

Once funds are appropriated for the program year, VETS issues a **Solicitation for Grant Applications (SGA)** for the competitively awarded grants. The SGA identifies eligible applicants [meaning those individuals or entities that can apply for the funds] and details the application procedures. The SGA is the primary document that potential grantees use to apply for competitive grant funds.

All applicants – new and old – should read the SGA extremely carefully, because the requirements for applications may change from year to year.



The SGA provides basic information about the types of activities that DOL is prepared to fund under the particular solicitation. For example, the SGA describes:




- The program;
- Proposed scope of work;
- Performance period;
- Eligibility requirements and the dollar amount; and
- Estimated number of grants to be awarded.

In addition, the SGA covers specific details about the timing and steps in the application process, and the required contents for the grant application. These include:

- Requirements of the grant application;
- The closing date for receipt of applications and instructions on how to submit;
- Reporting requirements for grant recipients; and
- Rating criteria used to review applications and award grants.

Eligible organizations interested in applying for competitive grants are encouraged to read the appropriate SGA thoroughly in order to gain a complete understanding of the requirements of the application process. Grant applications must be prepared based on the information contained in the SGA. Once complete, applications must be submitted to

the DOL national office for review. Typically, applications for competitive funds are due 30-45 days after the date of SGA publication.

Because of the short time period between SGA publication and the application due date, it is important for organizations interested in applying for competitive grants to begin preliminary planning early. See [Chapter Three](#)  for more detailed discussion on HVRP and [Chapter Five](#)  for VWIP. 

Unlike the competitive grants, discretionary grants are not typically awarded as a result of a published solicitation. Rather, these funds are administered at the discretion of the ASVET. However, in order to ensure program integrity, applicants for discretionary grants are instructed to follow the same submission format and program design criteria set forth in the most current competitive SGA for the applicable funding source. In addition, VETS staff may assist applicants for discretionary funds in developing and refining applications and supporting materials. For a discretionary grant, an eligible applicant submits an application to the Director of Veterans’ Employment and Training (DVET).



1.5.2 Review of Application, Grant Award and Grant Start Up

Once the competitive grant applications have been submitted, they are reviewed by a DOL panel and ranked using the rating criteria set out in the SGA. The rating criteria may be different from one SGA to the next, but may include, for example:

- The need for the project;
- Overall strategy to increase employment and retention;
- Quality and extent of linkages with other service providers;
- Demonstrated capability in providing required services; and
- Quality of overall strategy being proposed.

VETS state, regional and national offices review both competitive and discretionary grant applications and submit recommendations for the grants to be funded to the Assistant Secretary for VETS for funding approval. If necessary, other Department of Labor officials, such as the Grant Officer (GO), the Solicitor, and the Budget Officer, are consulted.


The Assistant Secretary for VETS makes the final determination about which grant proposals will be funded. Letters of notification of award are sent to applicants, with copies to the DVET. Typically, grant award notices are sent 45-60 days after the submission date of grant applications. Such notifications constitute the formal, legal grant award and include both “General Provisions” and “Special Provisions” that govern the performance of the grant.

Upon notification that the grant has been awarded, the DVET will also inform the grantee that a *Post-Award Conference* is scheduled. The general purpose of this session is to review the general and special provisions of the Grant Agreement in order to ensure a thorough understanding of the grant requirements. In addition, the conference is intended to provide a networking and learning opportunity for grantee organizations. The Post-Award Conference is discussed in more detail in [Chapter Three](#) (HVRP)  and [Chapter Five](#) (VWIP)  of this Guide.

Grant start-up should begin immediately. The grant program year typically operates from July 1 through June 30. Although the initial grant period is one year in length, VETS may offer grantees additional years of funding – “optional years” – depending on funding availability, Congressional appropriations, and grantee performance in the preceding year. Discretionary grants may not exceed 18 months.

1.5.3 Ongoing Monitoring of Grant Activity

The grantee’s responsibilities on the grant project are just beginning at the time of the Post-Award Conference. The DVET staff is also initiating their responsibilities for monitoring the on-going operations of these projects. Monitoring involves comparing actual program accomplishments and expenditures to the goals, objectives, and funding levels specified in the grant award (or modification.) Monitoring is used to identify potential problems as early as possible, so that corrective action can be taken in a timely manner.

Monitoring grantees involves collecting, reviewing, and analyzing information on grantee performance by state, regional and national VETS staff. The GOTR collects and reviews the reports grantees are required to submit on a regular basis, as well as information obtained during on-site monitoring visits. Following the GOTR’s review, both the RAVET and the VETS national office also review grantee reports. Grantee monitoring is further discussed in [Chapter Seven](#)  of this Guide.

1.5.4 Grant Modifications

Grantees are expected to submit applications that contain realistic goals and realistic cost projections. However, even in the most well designed project, over the life of a grant award unanticipated conditions may affect the project, requiring formal changes to the Grant Agreement. Such changes commonly include a change in a grant end date, an increase in expenditures, or an increase in program goals. One purpose of grant

monitoring is to identify such situations in time to prepare Grant Modification requests. Grantees submit a modification request to the GOTR, who conducts an initial review for completeness and accuracy. The GOTR then forwards the request to the regional office, and from there it is submitted to the VETS national office for recommendation for Grant Officer approval.

1.5.5 Availability of Technical Assistance

VETS and DOL want to ensure the success of every grant-funded project. In order to maximize the success of grantees, DOL/VETS offers technical assistance to grant-funded organizations to help them build capacity and successfully address challenges. Technical assistance is provided through both the GOTR and the regional administrators of VETS programs, and can take a variety of forms. For example, the GOTR may provide assistance to applicants in completing the grant application, such as guidance on the portions of the application form which tend to be the most complicated or are the most likely to be incorrectly completed.

Technical assistance may also involve providing advice on a grantee's proposed program and goals while the application is under review. For example, a reviewer might suggest that the proposed number of veterans to be served is unrealistically high or low, or that by changing the time schedules more veterans might be able to take advantage of a training class.

Finally, during the grant period, either the grantee or the GOTR might identify a problem which technical assistance could help to resolve, such as:

- Funds from one budget line being used to pay expenses from another budget line or;
- Actual number of enrollees being significantly below the projected number; or
- Grant funds being expended more rapidly than anticipated.

1.5.6 Addressing More Persistent Problems

Most VETS grantees are able to expend their grant dollars within the allotted time frame and achieve their expected program outcomes. However, in cases where the grantee has serious challenges, DOL/VETS has in place a set of actions that can be taken to address these problems. These actions include de-obligation and re-programming, and sanctions and penalties. Again, it is important for the grantee to understand that early identification of, and attention to, any program challenges is key.

De-obligation and Reprogramming: Grant funds awarded at the start of a program year are funds set aside, or “obligated” for specific purposes and may not be used for any purpose other than those detailed in the grant award agreement. Funds that are unexpended at the end of the program year are de-obligated and returned to the U.S. Treasury. VETS’ goal is to ensure that monies are not returned to the U.S. Treasury, but are used for the purpose of assisting veterans.

To help avoid the return of unobligated federal funds to the Federal Treasury at the end of each program year, early identification of any problems with a grant is important.

(Available technical assistance for grantees is described in more detail in [Chapter Seven](#).)



If funds awarded to a grantee will not be required (or cannot be effectively used through a modification to the grant), the de-obligation process must begin in sufficient time to ensure that dollars appropriated may be reprogrammed to serve other veterans. An important GOTR responsibility is to identify potentially recoverable or re-programmable funds through the grant monitoring process and to alert the RAVET and the VETS national office.

Sanctions and Penalties: All federally funded programs must be operated in strict accordance with the laws, regulations, and policies that cover them. Part of the GOTR’s responsibility in monitoring the grantee is to ensure that the grantee (or sub-grantee) does not take any actions that are prohibited by law, by regulation, by VETS policy, or by the grant award. If such a situation is identified, it must be investigated regardless of the intent of the grantee or sub-grantee, the severity of the action, the ambiguity or complexity of the governing language, or the amount of time or money involved.

In some cases, VETS may initiate action to impose sanctions against a grantee or even seek legal prosecution of an individual or entity involved in running a program. Part of the grant monitoring process is to identify activities that should be brought to the attention of those who must determine if sanctions should be imposed or even harsher measures should be considered. Sanctions and Legal actions are discussed in further detail in

[Chapter Seven](#).



1.5.7 Grant Close Out

At the end of the grant, the grant must be formally closed-out by the grantee, GOTR and the Grant Officer. “Close out” means the official end of the grant period, the expenditure of all grant monies, and the accomplishment of grant project goals. Close out typically occurs within 6 to 12 months after the grant expires. In order to formally conclude the grant, the

grantee must submit the final technical and financial report to the GOTR, who will ensure the report's accuracy and submit it to the Grant Officer.

1.6 Summary

This chapter of the VETS' Guide to Competitive and Discretionary Grants examined the origins and purpose of the Guide, and provided tips on how best to use this resource. The overview of the DOL/VETS grant process should be of particular help to new grantees with more limited knowledge of DOL/VETS and its grant programs. As noted above, the grant process contains several key elements, including: publication of the Solicitation for Grant applications; review of applications; grant award and start-up; ongoing monitoring and technical assistance; issues and modifications to programs; and grant close out.

Each element is further explored in subsequent chapters of this Guide. [Chapters Two](#) and [Three](#) examine the HVRP grant application process in greater detail, while [Chapters Four](#) and [Five](#) explore the process for VWIP grants. [Chapter Six](#) provides guidance regarding discretionary grants, while [Chapter Seven](#) offers an overview of monitoring and technical assistance, as well as close out procedures for grant projects.






Chapter Two Background and General Information on HVRP

This chapter expands on the Overview in Chapter One, providing a more detailed description of the Homeless Veterans' Reintegration Program (HVRP), its purpose and background, as well as program mission. After completing this chapter, the reader should have a full understanding of HVRP and the types of services that grantees can provide. In addition, the reader should be aware of eligible program participants and eligible applicants, and have a basic understanding of the criteria used for HVRP grant awards.

2.1 Purpose and Overview of the HVRP Program

The Homeless Veterans' Reintegration Program (HVRP) was the first nationwide Federal program focused on placing homeless veterans into jobs. The program was authorized under Section 738 of the Stewart B. McKinney Homeless Assistance Act (MHAA) of July 1987, and amended by Section 5 of the Homeless Veterans Comprehensive Assistance Act (HVCAA) of 2001. HVCAA provides that "the Secretary . . . shall conduct, directly or through grant or contract, such programs as the Secretary determines appropriate to provide job training, counseling, and placement services (including job readiness and literacy and skills training) to expedite the reintegration of homeless veterans into the labor force." The Veterans' Employment and Training Service (VETS) in DOL administers the program through a competitive grant process. (See DOL organization chart in [Section 1.4](#).)  Eligible organizations may apply to DOL/VETS for grant dollars to fund program activities that carry out the mission of assisting homeless veterans to re-enter the labor force.

2.1.1 Program Mission and Basic Objectives

To accomplish the overall mission, HVRP is designed to allow flexibility so that grantees may address any particular local or regional barriers that prevent homeless veterans from participating in the workforce. To accomplish the mission, HVRP seeks to fulfill two primary objectives:

- To provide services to assist in reintegrating homeless veterans into meaningful employment within the labor force; and
- To stimulate the development of effective service delivery systems that will address the complex problems facing homeless veterans.

While the emphasis is on labor force reintegration for homeless veterans, HVRP funds a mix of services to support the varied needs of this group. Linkages with other providers serving veterans are encouraged to promote a coordinated approach and to avoid unnecessary duplication of services.

2.2 Eligible Applicants and Participants

2.2.1 Eligible Applicants and Jurisdictions

Under HVRP, grants are competitively awarded based on the applications submitted in response to the Solicitation for Grant Applications (SGA). DOL/VETS accepts applications for HVRP funds from a wide range of state and local agencies and community-based organizations that are familiar with their areas and the population to be served and can administer an effective program. Once an applicant receives a funding award and enters into a Grant Agreement with DOL, the applicant becomes a “grantee.” The following categories describe the types of entities eligible to apply for HVRP grants:

- ***State and Local Workforce Investment Boards (WIBS)*** as defined in Section 111 and 117 of the Workforce Investment Act.
- ***Local public agency***, meaning any public agency of a general purpose political subdivision of a state which has the power to levy taxes and spend funds, as well as general corporate and police powers. (This typically refers to cities and counties.) A state agency may propose in its application to serve one or more of the potential jurisdictions located in its state. This does not preclude a city or county agency from submitting an application to serve its own jurisdiction.
- ***Private non-profit organizations*** that have operated an HVRP or similar employment and training program for the homeless or veterans and proven a capacity to manage grants and have or will provide the necessary linkages with

other service providers. Private non-profit organizations may include faith-based and community organizations.¹

An HVRP grantee may “*sub-grant*” part of its grant award to a sub-grantee to carry out specific program activities. *Sub-grants* can assist applicant organizations to demonstrate specific additional capacity and expertise to meet the employment needs of homeless veterans. The requirements for potential sub-grantees are essentially the same as for grantee organizations and may include experienced public agencies, private non-profit organizations, private businesses, and faith-based and community organizations that have an understanding of unemployment and the barriers to employment unique to homeless veterans, a familiarity with the area to be served, and the capability to effectively provide the necessary services.

HVRP includes both *urban and non-urban grants*. Currently, the only jurisdictions that can apply for urban grants are the metropolitan areas of the 75 largest U.S. cities (in terms of population) and the city of San Juan, Puerto Rico. Jurisdictions *outside* of the 75 largest U.S. cities (in terms of population) and the city of San Juan, Puerto Rico, may apply for non-urban grants. DOL/VETS conducts separate grant competitions for urban and non-urban grantees.

The *HVRP funding level* for local programs – and the total number of grant awards – vary from year to year. In recent years, awards for urban projects have generally ranged from \$200,000 to \$300,000, and for non-urban projects from \$125,000 to \$200,000. DOL/VETS reserves the right to negotiate the amounts to be awarded under each grant competition. DOL/VETS also specifies in each SGA a maximum grant amount (it differs for urban and non-urban projects), and requests exceeding this specified amount are considered non-responsive.

2.2.2 Participant Eligibility

DOL/VETS specifically defines who is eligible to receive HVRP-funded services. To be eligible for receipt of HVRP services, an individual must be homeless and a veteran, defined as follows:

¹ Entities described in Section 501(c)(4) of the Internal Revenue Codes that engage in lobbying activities are not eligible to receive funds from HVRP as Section 18 of the Lobbying Disclosure Act of 1995, Public Law No. 104-65, 109 Stat. 691, prohibits the award of Federal funds to these entities.

- The term "homeless or homeless individual" includes persons who lack a fixed, regular, and adequate nighttime residence. It also includes persons whose primary nighttime residence is either a supervised public or private shelter designed to provide temporary living accommodations; an institution that provides a temporary residence for individuals intended to be institutionalized; or a private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings. [Reference 42 U.S.C., Section 11302 (a)]
- The term "veteran" means a person who served in the active U. S. military, naval, or air service, and who was discharged or released there from under conditions other than dishonorable. [Reference 38 U.S.C., Section 101(2)]

In designing and developing activities to be funded under HVRP, local organizations should ensure that services are targeted to the particular population of homeless veterans.



2.3 Types of Services that HVRP Can Fund

HVRP grantees provide an array of services – directly or through linkages and partnerships (discussed further below) in the local community – focused on the end goal of enhancing the employability of homeless veterans. Grantees accomplish this goal through: outreach to attract participants into the program; providing supportive services directly or through referral; and providing a variety of employment services and job placement. The descriptions below illustrate each of these program components to show the mix of employment-related and supportive services that can be funded by the grant.

Outreach is a central component of HVRP. Grantees can perform outreach through connections with a variety of local homeless services providers, such as shelters, day centers, soup kitchens, Department of Veterans Affairs (VA) services, and medical centers, among other programs for the homeless. Grantees can undertake grassroots outreach as well by accessing specific locations where homeless individuals are known to gather. Since its inception, HVRP has required grantees to include an outreach component using veterans who themselves have experienced homelessness. In recent years this requirement was expanded to allow projects to utilize formerly homeless veterans in other positions with direct client contact (when there is limited need for outreach) as well, such as counseling, peer coaching, and intake and follow up. Outreach is also important for grantees to promote HVRP-funded activities and to educate to the wider community about the needs

of homeless veterans. (See [Section 2.3.2](#)  Related Program Development Activities, for further discussion.)

In keeping with the program's mission, HVRP-funded programs focus on helping veterans re-enter the labor market. The range of HVRP funded **employment and training services** can include:

- **Classroom training.** Classroom training is conducted in an institutional setting and is designed to provide individuals with either technical skills or other information to help them gain employment or to perform a specific job. This type of training may also include that designed to enhance the employability of individuals by upgrading basic skills through the provision of courses such as remedial education, basic literacy instruction; or English-as-a-Second Language instruction;
- **Job search activities.** Job search activities may focus on building practical skills and knowledge to identify and initiate employer contacts and conduct successful interviews with potential employers. A grantee may use various approaches for these activities, such as participation in a job club, instruction in identifying personal strengths and goals, resume and application preparation, instruction on interview techniques and job counseling on labor market information and aptitude identification for specific types of employment. Job search assistance is often a "self-service" activity in which individuals can obtain information about specific job openings or general job or occupational information;
- **Job preparation.** Job preparation activities may include resume writing and interviewing techniques and skills to assist the veteran in the process of applying for employment;
- **Subsidized trial employment.** This type of work experience gives the veteran participant the opportunity to apply basic job skills in a supported environment;
- **On-the-job training.** On-the-job training (OJT) is training by an employer that is provided to an employee/paid participant while engaged in productive work in a job that: (a) provides knowledge or skills essential to the full and adequate performance of the job; (b) provides reimbursement to the employer of up to 50 percent of the wage rate of the participant for the extraordinary costs of providing the training and additional supervision related to the training; and (c) is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience

of the participant, and the service strategy of the participant, as appropriate. Typically the OJT agreement includes a promise that the employer will hire the trainee upon successful completion of the training;

- **Job placement.** Placement services are geared toward placing participants into employment and may involve a combination of job search assistance, training, and/or job development. These services are initiated to enhance and expedite a participant’s transition from training or unemployment into employment;
- **Placement follow-up services.** The goal for placement follow up is to track what happens to participants for six months after placement; and
- **Services provided under Workforce Investment Act (WIA).**

HVRP tries to enhance the employment and training services that it funds directly by promoting **linkages and coordination** with veterans services programs

and organizations. For example, DOL/VETS urges grantees to work hand-in-hand with DVOP/LVER staff to achieve economies of resources. Partners include:

- Disabled Veterans’ Outreach Program (DVOP) Specialists, Local Veterans’ Employment Representatives (LVERs) in the State Workforce Agencies (SWAs) or in the workforce development system’s One-Stop Centers, and Veterans’ Workforce Investment Programs (VWIPs);
- Department of Veterans Affairs (VA) services, including its Health Care for Homeless Veterans, Domiciliary, and other programs, including those offering transitional housing; and
- Veteran service organizations such as The American Legion, Disabled American Veterans, the Veterans of Foreign Wars, Vietnam Veterans of America, and the American Veterans (AMVETS).

VETS encourages grantees to utilize the services of the local **Disabled Veterans’ Outreach Program (DVOP) and Local Veterans’ Employment Representatives (LVER)** in the provision of a variety of HVRP services. VETS provides grant funds to each state’s employment service to support DVOP specialists in the state. The role of DVOP specialists is to develop job and training opportunities for veterans, with special emphasis on veterans with service-connected disabilities. DVOP specialists provide direct services, work with employers, veterans’ organizations, Department of Veterans Affairs and Defense, and serve as case managers for veterans enrolled in federally-funded job training programs. LVERs are state employees located in state employment service local offices to provide assistance to veterans in job development and placement and obtaining needed services.

Because DVOPs and LVERs are charged with making connections with employers, developing job opportunities and providing case management for veterans searching for employment, it is important that HVRP grantees connect with these specialists and tap into the services they provide.


Job development is also a crucial HVRP-funded activity to carrying out the mission of HVRP. Job development is a process of marketing a program participant to potential employers and developing connections between potential job openings and homeless veteran applicants for those jobs. The grantee can foster this program component through collaborations with staff in other organizations. Wherever possible, the grantee must utilize DVOP specialists and LVER staff for job development and placement activities for veterans who are ready to enter employment. (See description above of DVOP and LVER.)

HVRP-funded programs can also provide a wide range of **supportive services and referrals** to necessary treatment services, rehabilitative services, and counseling to support and stabilize homeless veterans prior to addressing employment goals. These services may include (but are not limited to):

- Alcohol and drug treatment services (substance abuse);
- Medical treatment services;
- Post-Traumatic Stress Disorder treatment services;
- Mental health treatment services; and
- Coordinating with health care for the homeless programs [health care programs under the HVCAA].

HVRP funding is also used to address the **shelter and housing needs** of participants through referrals to and linkages with providers of housing assistance, such as:

- Local shelters;
- Federal Emergency Management Administration (FEMA) food and shelter programs;
- Transitional housing programs and single room occupancy housing programs funded under McKinney Housing Assistance Act (MHAA) Title IV [and under the HVCAA];
- Permanent housing programs for homeless individuals with physical/mental disabilities funded under MHAA Title IV [and under the HVCAA]; and
- Department of Veterans Affairs programs that provide for leasing or sale of acquired homes to homeless providers.

To coordinate the services provided to homeless veterans, grantees are required to utilize a **case management** approach. Case management is a client-centered approach towards the delivery of services. The case manager essentially acts as a facilitator in assisting the veteran to access necessary services and to help create an **employment development plan**. Through case management, with assistance from the grantee/DVOP/LVER, each veteran engaged in HVRP-funded activities is required to create an individual development plan to ensure identification of employment-related goals and follow through to achieve those goals. Grantees are encouraged to use DVOP and LVER staff (see description above) for case management services. Many of these staff members have received training in case management at the National Veterans' Training Institute (<http://nvti.cudenver.edu/new/default.htm>)  and focus on assisting those veterans with barriers to employment.

2.3.1 Emphasis on Achieving Results

With the introduction of the Government Performance and Results Act (GPRA) in the 1990s, Congress and the public are increasingly focused on program *results* rather than process. Applicants are thus encouraged to design HVRP-funded activities that are responsive to local needs, and will meet the objectives of the program to successfully reintegrate homeless veterans into the workforce – i.e., programs that are “results-oriented.” While placement into jobs should remain a primary positive outcome for HVRP participants, HVRP grantees are also required to measure results for at least six months after placement in order to assess a homeless veteran’s retention of employment. This measurement can indicate whether the HVRP program is achieving long-term success.

Each HVRP-funded activity should be approached from the perspective of how can it be designed and implemented to achieve measurable results. For example, HVRP grantees should strive to:

- Conduct outreach at a level that is sufficient to reach and enroll eligible homeless veterans;
- Establish contact with other agencies that encounter homeless veterans;
- Assess the abilities, interests and needs of potential participants, referring them – where needed – to services such as social rehabilitation, drug or alcohol treatment and/or a temporary shelter to stabilize them before they are enrolled into core training;

- Once supportive services are in place, focus assessments on the employability of the participants with the formulation of an Employment Development Plan;
- Determine whether the participants would benefit from pre-employment preparation such as resume writing, job search workshops, related counseling and case management;
- Determine whether participants would benefit from entry into the job market through temporary jobs, sheltered work environments, entry into classroom, on-the-job training, or a specific job-training program;
- Promote direct entry into full-time employment in keeping with the objective of HVRP to bring the participant closer to self-sufficiency; and
- Conduct follow-up to determine whether the veteran is in the same or similar job at the 90- and 180-day period after entering employment.

It is important that the grantee maintain contact with veteran participants after placement to assure that employment-related problems are addressed. This follow up is fundamental to assessing program success, and is reported in the 90 and 180 day final technical performance reports.



**Exhibit 2.1
A Results-Oriented Model of HVRP**



HVRP grants are initially awarded for twelve months. A results-oriented model provides HVRP grantees with the framework to maximize their chances of achieving the desired outcomes within this twelve-month grant period. Achieving positive outcomes is important not only for fulfilling initial program goals, but also for making a grantee eligible for additional funding, when conditions allow. When funding permits, DOL/VETS may exercise the option to provide optional years of grant support to HVRP programs. (Note that the Federal Government does not, however, guarantee additional year funding for any grantee.) Should DOL/VETS decide to offer optional year funding, the grantee's performance during the most recent period of HVRP grant program operation will be considered as follows:

1. By the end of the third quarter of the program year, the grantee must meet at least 85 percent of the twelve-month total goals for Federal expenditures, enrollments, and placements; and
2. The grantee must be in compliance with all terms identified in the solicitation for grant application, general and special provisions; and
3. The grantee must have submitted all program and fiscal reports by the established due date (such reports may be verified for accuracy).

2.3.2 Related HVRP Program Development Activities

It is important for HVRP grantees to promote linkages between the grantee and local service providers in order to eliminate gaps or duplication in services and to enhance provision of assistance to program participants. Outreach to other service providers also helps to increase awareness of and access to employment-related services available to homeless veterans, and to familiarize other providers with the needs of homeless veterans. In order to create these linkages, HVRP grantees must provide orientation and/or service awareness activities to local service providers in their jurisdiction. Project orientation workshops conducted by grantees can be an effective means of sharing information and revealing the availability of other services; such workshops are encouraged but not mandatory. Rather, a grantee has the flexibility to design its own strategy to share information, perform outreach and connect to other local providers. A grantee's strategy may include attending service provider meetings, seminars, conferences, out-stationing staff, developing individual service contracts, and involving other agencies in program planning. At a minimum, however, as a part of their linkage activities, the grantees are responsible for providing appropriate outreach, information sharing, and orientation activities to the following types of organizations (this list is not exhaustive):

- Providers of direct services to homeless veterans, such as shelter and soup kitchen operators.
- Federal, state and local entitlement services such as the Social Security Administration (SSA), Department of Veterans Affairs (VA), State Workforce Agencies (SWAs) and their local Job Service offices, One-Stop Centers (which integrate Workforce Investment Act organizations, labor exchange, and other employment and social services), detoxification facilities, etc.
- Civic and private sector groups, and especially veterans' service and community-based organizations (including faith-based organizations).



In addition to the orientation and sharing activities described above, HVRP grantees can play an important role in local **“Stand Down” events**. A Stand Down is typically a three-day event where a number of service providers come together to offer a variety of services and referrals to homeless veterans, such as shelter, meals, clothing, and medical attention. This event is organized within a community and attempts to bring together service providers such as the VA, DVOP Specialists and LVER Representatives from the State Employment Service Agencies, veterans service organizations, military personnel, civic leaders, and other interested persons and organizations. This highly publicized event can serve as a catalyst to enable homeless veterans to access and learn about needed services. In geographic areas where an HVRP-funded program is operating, the grantee is encouraged to participate fully and offer their services for any planned Stand Down event. To this end, **a portion of HVRP grant funds applied for (the specific amount allowed is detailed in the Solicitation for Grant Applications) may be used to help support the Stand Down effort** where funds are not otherwise available, and should be reflected in the budget and budget narrative.

2.4 Rating Criteria for Awards

DOL/VETS uses a set of criteria to review and evaluate applications for HVRP grant funds. While these are explained more thoroughly in the discussion on application development in Chapter Three, this section provides a general introduction. The SGA details these criteria and it is important for the applicant to understand the elements of each and their relative weights. These criteria provide the blueprint for what DOL/VETS is looking for in HVRP-funded programs and the basic design of an effective program. The criteria and relative points for each element may vary from year to year, and applicants should review

the SGA carefully for a full description. The criteria and potential point assignments include, for example:

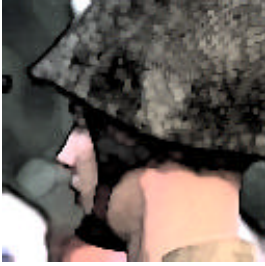
- Need for the Project: 15 points
- Overall Strategy to Increase Employment and Retention: 40 points
- Quality and Extent of Linkages with Other Providers of Services to the Homeless and to Veterans: 10 points
- Demonstrated Capability in Providing Required Program Services: 20 points
- Quality of Overall Housing Strategy: 15 points

In addition, DOL/VETS reviews applicant cost proposals along with the narrative description of the proposed program. DOL/VETS considers several factors in review of program costs, including allowability, allocation of costs, and reasonableness of placement and enrollment costs. More details on the development of responsive grant applications and the panel review process may be found in [Section 3.2](#)  "The HVRP Application Process" and [Section 3.7](#)  "The Application Review Process."

2.5 Summary

This chapter has provided background information on HVRP and the program emphasis. Within the general flexibility that the HVRP grant offers, grantees can design a range of program elements that respond to local needs. This chapter has also emphasized a number of important elements that should be present in HVRP grant programs such as linkages and coordination with other providers in order to maximize services and avoid duplication of efforts. Finally, the chapter has highlighted the importance for grantees to achieve their performance targets in order to attain the greatest results in moving homeless veterans into employment, as well as to qualify for potential additional funding.





Chapter Three

The HVRP Grant Application and Award Process

This chapter describes the process for applying for Homeless Veterans' Reintegration Program (HVRP) funds. The chapter includes guidance on the overall content of the grant application, or proposal, as well as specific instructions for how to complete particular sections of the proposal package. The final section of the chapter describes the application review and grant award processes, and project start up. Special guidance for both new and existing applicants is also highlighted.

3.1 Special Guidance for New and Existing HVRP Applicants

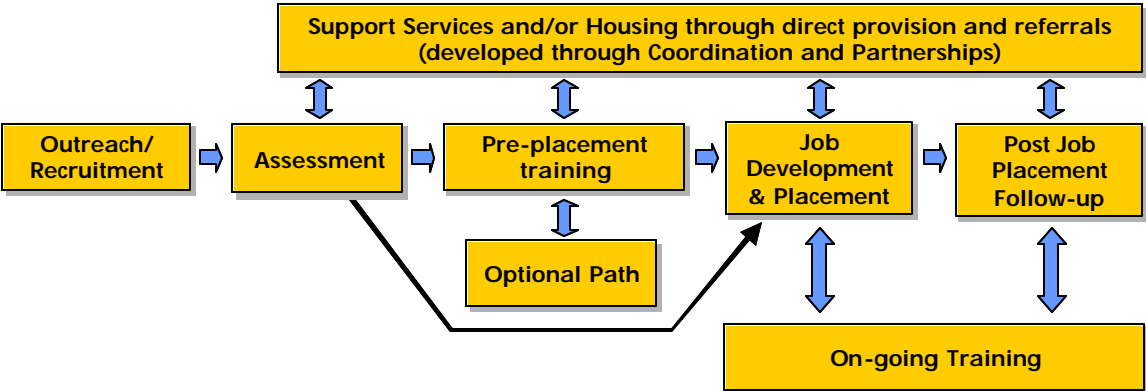
Organizations eligible to apply for an HVRP grant can begin to think about how to structure an HVRP-funded program early, well before the publication of the Solicitation for Grant Applications (SGA). The deadline for submitting an application for HVRP funds is typically 30-45 days after the date of publication of the funding announcement. Proposal preparation can take a significant amount of time, thus beginning the process early can allow an applicant enough time to pull together information, design a responsive program, and identify potential sub-grantees and other service providers with which to partner.

An understanding of the primary goals of the HVRP grant and the basics of program design can help a new applicant to begin designing its program. Although these points are mentioned particularly with the new applicant in mind, they are important for **all applicants** – those that have never applied for the grant, and those that have received funding in the past.

Basics of Program Design: Although an HVRP-funded program can be flexible in its approach to serving homeless veterans, it must provide a number of specific services. These services include an outreach, intake and assessment component in order to attract and enroll eligible participants. Coordination with other providers that serve veterans is key: HVRP-funded programs must have in place effective partnerships with other veterans'


service organizations. A system of referrals to a variety of supportive services, including health, substance abuse and temporary housing assistance must be in place and available to the homeless veteran participant. The HVRP-funded program must also provide effective employment and training services. For these, an array of services can be available, ranging from job placement to classroom training, to on-the-job training or work experience. Finally, placement follow-up services are an essential element to HVRP programs, as the program emphasis is not only on job placement but retention of employment. Exhibit 3.1 depicts one possible design for organizing a mix of HVRP services and the possible path that participants may follow.

Exhibit 3.1
Sample Design for HVRP Program Services




Increasing the Competitiveness of An Application: For both new applicants and existing grantees applying for an HVRP grant, there are a number of ways to help increase the competitiveness of the application. First, it is important to read and understand fully the SGA and the requirements described. Most especially, applicants should pay attention to the rating criteria in order to ensure that the grant program responds to these particular standards. In addition, the applicant must demonstrate an understanding of the employment and training needs of homeless veterans in their particular area, and present a program that will meet those needs while being responsive to the SGA requirements. Finally, an applicant should keep in mind that the organization must be able to get a program up and running as soon as an HVRP grant is awarded; thus, demonstrating relevant past performance and the organizational capability and ability to implement a new program immediately is key.

Challenges Faced by New Applicants: New applicants to the HVRP program face particular challenges. These include, for example, having in place sufficient linkages with other providers and developing realistic goal projections. In order to respond to the rating criteria, programs must have in place sufficient linkages with other service providers as described above. These partners can be essential in providing necessary supportive services, such as housing, shelter, and social services to program participants. In addition, new applicants should give careful consideration to realistic projections for program participant goals and outcomes as well as the rate of expenditure of grant funds over the program year. For example, in terms of projection of goals for the HVRP-funded activities, it is likely that expenditures for each quarter will not be equal as the initial start-up period (the first program quarter) may require an extra investment of grant funds, or alternatively, spending during the first quarter may be less than the average cost per quarter. Similarly, for participant goals such as job placements, the number of placements per quarter might vary, with an initial start-up period with fewer placements, followed by an increase in the rate of placements in subsequent quarters.

Anticipating Reporting Requirements: The new HVRP applicant should keep in mind the mandatory reporting required of grantees. A format for reporting is provided in the SGA; applicants should become familiar with the reporting format and should be prepared to develop internal systems to track the information required as soon as a program begins. In addition, applicants should be aware of required attendance at the “post-award conference” (discussed more fully in [Section 3.8](#)  below).

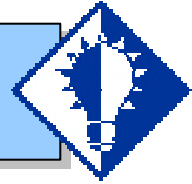
3.2 The HVRP Application Process

3.2.1 Solicitation for Grant Applications (SGA)

The HVRP grant application process begins with the issuance of the SGA by DOL/VETS. The SGA is published electronically on the Federal government’s grants website, at <http://www.grants.gov>.  The SGA announces the availability of HVRP funds for competitive award, and provides information to potential applicants about the funding levels for the current grant round and process for application. Even for experienced grantees, it is important to read the SGA carefully and thoroughly because there may be changes in the program design or applicant requirements between funding rounds. The SGA is typically issued annually, and is available on-line. In addition, VETS usually posts

a notification on the DOL/VETS web site indicating the availability of the SGA. Often, SGAs are published in the spring.

Organizations interested in applying for HVRP grants should monitor the DOL/VETS website closely in order to be able to prepare a timely response to any SGA issued.



Information in the SGA: The SGA for HVRP grants contains detailed information on program design and application requirements. The SGA will typically describe the following:

- **Eligible applicants;**
- **Types of activities allowable under the grant;**
- **Particular program emphasis of the Office of the Assistant Secretary for VETS (OASVET);**
- **Criteria used in making awards;**
- **Program year funding levels;**
- **Number of grantees that may receive awards;**
- **Typical grant amount;**
- **Matching funds requirements, if applicable;**
- **Period of performance (i.e., the program year, which runs from July 1 through June 30);**
- **Deadline for submission; and**
- **Appropriate method of submission.**

The SGA also describes and contains a number of **required forms** that must be completed and submitted as part of the application package.

To aid in preparing your application, the following sections provide general guidance on the preparation of each component of the HVRP proposal. As described in the SGA, a proposal for HVRP grant funds must contain a number of elements. These include:

- **A transmittal (or cover) letter;**
- **A technical proposal which includes:**
 - Program narrative;
- **A cost proposal which includes:**
 - SF-424 form, Application for Federal Assistance (detailed instructions on completion of this form appear in Appendix A);

- SF-424A, Budget information sheet (detailed instructions on completion of this form appear in Appendix B);
- Budget narrative; and
- A signed Assurances and Certifications form.

3.3 The Technical Proposal

3.3.1 Transmittal Letter

The cover letter accompanying the grant application is called a *transmittal letter*. The letter must contain the following:

- Clear certification that the applicant is an “eligible entity”;
- An **original** signature of an official who has the authority to enter into a Grant Agreement between the Department of Labor and the grant recipient (blue ink is preferred for the original signature).

3.3.2 Preparation of Part I – Technical Proposal

Program Narrative Format: The SGA outlines the requirements for the program narrative for an application for HVRP funds. The SGA also indicates the specific page limit for this section of the HVRP proposal. Typically, the program narrative is limited to 10 to 15 pages, single-sided, in font size no less than 11 point. The program narrative of the proposal should include three basic sections, as discussed below. In developing the program narrative portion of the proposal, the applicant should keep in mind the rating criteria outlined in the SGA, as these are the key elements on which the proposal is evaluated.

Brief Introduction and Statement of the Problem: This introductory portion of the narrative should briefly describe the proposed program, generally outlining the problems of homeless veterans in the geographic area to be served. This general overview of the applicant’s proposal should:

Rating Criteria for HVRP

Technical Proposals:

- Need for Project
- Overall Strategy to Increase Employment and Retention
- Quality and Extent of Linkages with Other Providers
- Demonstrated Capability in Providing Required Services
- Quality of Overall Housing Strategy

Cost Proposals:

- Allowability of Costs
- Allocation of Costs
- Reasonableness of Costs

- Define the geographic area to be served by the HVRP grant;
- Identify the eligible group of veterans to be served (i.e., homeless veterans);
- Identify any subsets of eligible veterans who will receive priority services (such as minority, female, or disabled veterans); and
- Define briefly and clearly the problems and needs of the targeted population of homeless veterans.

Justification of Need for Proposed Services: Following the initial introduction of the proposed program and the problems the proposed activities will address, the applicant should clearly document the need for the services proposed to be funded by an HVRP grant. This section of the proposal provides a more detailed examination of the problems and needs of homeless veterans in the area, with particular emphasis on the subset of problems that the proposed HVRP grant will address. The applicant must demonstrate a clear understanding of the environment in which the program is to operate, and the specific problem that the program will address (the employment and training needs of homeless veterans). To justify the need for the program, the applicant should not only describe the needs but also present data to support the assertion of needs. In addition, this description must address how the proposed program will add value to the currently available employment and training services. The applicant should ensure that this section covers the following points:

- An estimate of the number or concentration of homeless veterans in the area, especially relative to other similar areas of the jurisdiction;
- A description of the poverty and unemployment rate in the area as determined by census or other surveys, the gaps in local community infrastructure that contribute to the employment or other barriers faced by the homeless veteran population;
- Provide information and data to support the problem statement/needs assessment (e.g., statistical reports and other forms of documentation, including newspaper articles);
- A description of how the proposed program would respond to the needs outlined in terms of the specific services to be offered; and
- A description of the outlook for job opportunities in the area served by the program.

Exhibit 3.2 Approach to Addressing Needs



Proposed Approach: Statement of Work, Management Plan and Program Goals: In this section of the proposal, the applicant presents information about how the HVRP-funded activities will be carried out, and defines the goals and objectives of the proposed program. The applicant also demonstrates its organizational capacity to carry out the proposed services.

In defining the approach to provide the HVRP-funded services, the applicant should demonstrate a clear, logical relationship between the problem statement and needs assessment, the services to be provided, and the proposed program approach and activities. Exhibit 3.2 above illustrates the direct relationship that should exist between the problem and needs of homeless veterans and the program approach. Further, in describing the approach, the narrative should explain how the proposed program will meet the identified deficiencies or gaps that currently exist in the area's services, and how the program will:

- Provide services beyond and above current services;
- Provide services not normally provided by other employment and training service providers; and
- Represent additional productivity or effectiveness.


In this section of the narrative, the applicant must cover a number of areas in order to be considered responsive to the SGA. These include providing a description of the applicant's strategies to provide a number of key services. The applicant must describe the following:


- The strategy to increase employment and job retention of participants;
- The strategy to provide supportive services; and
- The strategy to meet housing needs.

Further, to demonstrate its organizational capacity, the applicant must also describe the linkages in place with other organizations to carry out activities considered part of the applicant's approach as well as the applicant's organizational and staff capacity to

implement the program. Finally, and most importantly, the applicant must include specific goals and objectives for its proposed program. Each of these proposal elements is described below.

Approach or strategy to increase employment and job retention: Applicants should describe the program approach to providing comprehensive employment and training services for homeless veterans. As outlined in Chapter Two, the employment training, placement and retention services funded by HVRP can take a variety of forms, including job training, job search assistance, on-the-job experience, job development, employer commitments to hire, placement activities, and post-placement follow-up services. In describing the strategy, the applicant should address the intent to target occupations in expanding industries, rather than those in decline. In addition to describing the services to be provided, applicants should identify the local human resources and sources of training to be used for participants as part of the strategy, and of the relationship, if any, with other employment and training programs. The applicant should indicate how the activities will be tailored or responsive to the needs of homeless veterans in the particular geographic area as detailed in the “Needs” section of the proposal.

The narrative should provide specifics about the activities to be provided. For example, if classroom training is to be offered, the applicant should describe the type(s) of training, the occupation for which training will occur, and the duration of the training. For on-the-job training, the applicant must include the wage rate formula to be used to pay for positions. (Unless otherwise indicated, it is assumed that the **Occupational Information Network (O*Net)** (http://www.doleta.gov/programs/onet/onet_default.asp)  will be used to determine both wages and the length of training.)

The applicant may use a “participant flow chart” to illustrate how participants may access the mix of services available, and how these services may be sequenced to better meet the individual needs of participants. See for example, the sample design of services in **Exhibit 3.1**  above.

Emphasis on job retention is key to a strong HVRP-funded program, and is accentuated in the rating criteria in the review of proposals. For example, applicants with strategic plans that support a 70 percent outcome of six-month retention are awarded more points in the application review process than applicants who plan for a lower retention rate.



Supportive services strategy: A supportive services strategy must be a significant part of the proposed HVRP-funded program. In order to assist homeless veterans to overcome barriers to employment, the applicant must demonstrate its strategy to provide necessary supportive services that will support the homeless veteran. The proposal narrative should describe how necessary supportive services for program participants would be accessed and used. These include, for example, health or mental health services. A program may offer these services, or may provide referrals to other service providers.

Housing strategy: Although HVRP funds cannot pay for the purchase of housing, an applicant should demonstrate effective mechanisms in place to provide referrals to appropriate shelter and other housing providers for program participants entering the labor force. The narrative should describe how the applicant would help its homeless veteran participants access housing resources – temporary, transitional or permanent.

Linkages with providers of services outside of HVRP grant and with other Federal agencies: The applicant should ensure that the narrative fully describes its network of linkages with other service providers in the area, including programs of other Federal agencies, in order to accomplish its strategies for employment, training and retention as well as supportive services and housing. The narrative should include:

- A description of the types of agreements (such as Memoranda of Understanding or Agreement) that govern these relationships;
- A description of the applicant’s relationships with the Disabled Veterans’ Outreach Program (DVOP) and the Local Veterans’ Employment Representative (LVER) program and how these resources will be utilized in carrying out the proposed HVRP-funded program;
- A description of other available programs under the Workforce Investment Act and the types of services available;
- An explanation of how the program will coordinate with other efforts or programs for homeless persons, including any “*continuum of care*” efforts.

Continuum of Care is a planning approach to address homelessness that includes a coordinated community-based process of identifying needs and building a system to address those needs. The approach is predicated on the understanding that homelessness is not caused merely by a lack of shelter, but involves a variety of underlying, unmet needs -physical, economic, and social.

- A description of any linkages with Department of Housing and Urban Development (HUD), Department of Health and Human Services (HHS) or Department of Veterans Affairs (VA) programs and resources.

Organizational capacity: In order to demonstrate the organization’s capability to carry out the proposed program, the applicant should: address its capacity for timely start-up of the program; describe its staff capability to manage the activities² and the financial aspects; and include a recent financial statement as an attachment (or audit, if available). The applicant should show how its current or previous experience in operating employment or training programs is relevant to the proposed HVRP-funded program. If sub-grantees are to be used as part of the proposed program, their relevant experience should also be described. Applicants should submit evidence of satisfactory financial management capability, which must include recent financial and/or audit statements.

As part of its discussion on goals and objectives for the proposed program (see further discussion below), the applicant should detail specific outcomes to be achieved in terms of clients placed in jobs, proposed wage rate and benefits that will be associated with those jobs, and job retention, for example. To demonstrate capacity as well as the reasonableness of the proposed goals, the applicant should describe outcomes of past programs such as enrollments and job placements. If the applicant has operated an HVRP, Job Training Partnership Act (JTPA) IV-C, Veterans’ Workforce Investment Program (VWIP) or other homeless veteran employment program, the proposal should include the final or most recent technical performance report for each such program as an attachment to the proposal.

If the applicant’s current staff is to be used to provide the services proposed under the grant, the applicant must stipulate that the grant funds will be used to produce additional services, not simply to replace existing services or funds. In other words, VETS’ grant funds are not to be used to fund services already being provided.



Goals and Objectives: One of the most important components of the program narrative is the discussion of the applicant’s participant goals and objectives. When discussing the program’s goals, the applicant should demonstrate that the proposed goals and objectives are both reasonable and attainable. To do so, the applicant should

² Note that resumes of staff may be included in an appendix to the technical proposal and will not be considered in the page count.

address factors such as past experience in achieving similar goals in similar programs; utilization of staff resources to accomplish goals; and the extent to which the proposed approach and program support the attainment of goals. In addition, the applicant should explicitly discuss how the program goals and objectives support the program emphasis as defined by the Office of the Assistant Secretary for VETS (OASVET) and stated in the SGA, and any applicable strategic plan measurements or outcomes. The applicant should identify specific, numerical program goals by quarter for each of the following (use only the goals table as provided in the SGA):

- Total number of participants³;
- Total number of participants to be placed into unsubsidized employment; and
- Total number of participants to be enrolled in each proposed employment and training activity described in the application.


In addition to demonstrating its numerical goals, the applicant should indicate the projected placement volume and rate for both HVRP participants and participants in other programs funded by match or/in-kind contributions (if the applicant is using match funds). When placement goals are included, the placement rate, cost-per-placement, and job retention goals must be included. Placement rate and cost-per-placement are to be presented separately for the HVRP grant funds and, if applicable (if the applicant is using other funds), match funds. Applicants who exceed the average for cost-per-placement for their respective state must provide justification.

If the program includes a direct placement component, the types of jobs which participants will be placed in should be identified when possible. (If placement will be performed by another agency, describe the mechanism by which that agency will follow-up on placements and verify job retention.)

In addition to discussing performance goals relative to training, placement and job retention of homeless veterans, this section of the proposal should also specify goals relative to accessing services for those participants; and it should also note any other broader program goals being attempted. For example, as part of the discussion of program objectives, a goal to “increase utilization” of other services (or service providers) must be explained completely. At a minimum, the applicant should describe how the baseline, or beginning point, from which to measure any increase will be determined and how the increase will be measured. In addition, the applicant should identify any non-quantifiable and/or general program goals and objectives (if applicable to the applicant’s

3 Note that a “participant” is an individual who: 1) is determined eligible upon intake; 2) started to receive services; and 3) received more than outreach and/or intake and assessment services.

proposal). These might include for example, increasing general knowledge in the community of the plight of homeless veterans. The applicant should provide specific points of reference or “benchmarks” to be used in determining if such goals and objectives are being attained, and describe the expected benefits to the targeted veterans to be derived from achieving those goals and objectives.

Finally, the applicant should describe how performance will be tracked and reported to monitor whether or not goals and objectives are being achieved. (See [Chapter Seven](#)  for further discussion of reporting and monitoring grantee performance.)

Guidance for Inclusion of Sub-grantee Information: An HVRP grantee may “sub-grant” or “sub-award” part of its grant award to another agency to carry out activities. For the proposal, the applicant must submit a narrative summary of no more than one page for each proposed sub-grantee. For each sub-grantee, the following information is required:

- Name and address of the sub-grantee, including the name of a key person who will be the point of contact and phone number;
- Short statement of work, indicating program approach;
- Quarterly breakout of the participant goals and objectives of the program for the sub-grantee; and
- Budget allocation information.

3.3.3 Additional Notes on the Program Narrative: Other Things to Keep in Mind

Relationship between program narrative and the cost proposal part of the application: Although this Guide contains detailed guidance on completing the cost proposal in the following section and in the appendices, it is important to note that data included in the cost proposal must be fully consistent with the information presented in the narrative. That is, all activities described in the program narrative should be reflected in the budget (the SF-424A) and budget backup, both in terms of the types of activities and the amount and timing of resources to carry them out. The following suggestions should be considered when developing the program narrative relative to the costs of the program:

- Proposed staff activities must be described, and those descriptions must support the percentages of staff time included in the budget.

- If sub-grantees are involved, sub-grantee costs are to be explained as required in the SGA.
- Travel, equipment, supplies, and other charges in the budget, such as mileage rate, must be explained and justified. Who will be traveling? Where? Why? How? What equipment is to be obtained? What supplies are to be purchased?
- Mileage indicated in the budget must be reasonable, based on the geographic area to be covered, the number of planned participants, and other relevant factors.
- All costs reflected in the budget are to be reasonable with respect to the program approach.

3.4 Guidance on Preparing Part 2 – Cost Proposal



The **cost proposal** is the section of the HVRP grant application where the applicant details the financial costs of the proposed program. All costs associated with the proposed program are presented in the cost proposal including personnel costs, travel, equipment, supplies and allocation of sub-award amounts. In addition, if the applicant proposes a funding or in-kind match to the grant, these amounts and their allocation are described.

The cost proposal is comprised of:

- The Application for Federal Assistance form, (Standard Form (SF) 424);
- The Budget Information Sheet (Standard Form (SF) 424A);
- Budget narrative information; and
- The Assurances and Certifications form.

The order of these cost proposal elements is typically the order required by the SGA. The following section presents information on each of these elements of the cost proposal.

3.4.1 Cost Principles for Development of Cost Proposal

Applicants should become familiar with the cost principles described in the Office of Management and Budget (OMB) Circular A-87 "Cost Principles for State, Local and Indian Tribal Governments" (<http://www.whitehouse.gov/omb/circulars/a087/a087-all.html>)  and/or OMB Circular A-122 "Cost Principles for Non-Profit Organizations" (<http://www.whitehouse.gov/omb/circulars/a122/a122.html>)  in order to prepare a proper and correct budget proposal for an HVRP grant. Although

applicants are expected to adhere to the cost standards established by these OMB Circulars, it is also important to keep in mind that there may be other regulations or legislation (Federal, state or local) that take precedence over these principles. These exceptions are generally limited to cases where such rules or laws set higher or more restrictive standards.

The key cost principles included in OMB Circulars A-87 and A-122 are that costs should be **allocable**, **reasonable** and **allowable**. Applicants must understand what these principles entail, and how these principles should be applied to the cost proposal. These terms are defined below:

Allocable – A cost is considered allocable if it is assignable to a particular objective or activity in accordance with the relative benefits received. Specifically, a cost is allocable to a VETS grant if it:


- Is incurred specifically for the grant;
- Benefits both the grant and other work, but the expenses can be distributed in reasonable proportion to the benefits received by each; or
- Is necessary to the overall operation of the organization, although a direct relationship to any particular cost objective cannot be shown. (A cost objective is a particular function, organizational subdivision or activity for which costs are incurred.)

Examples of allocable costs include personnel and space costs for seminars.

Reasonable – A cost is reasonable if it is generally recognized as both ordinary and necessary for the conduct of the grantee's program or the performance of work under the grant. In addition, a cost is reasonable if, in its nature or amount, it does not exceed amounts that would be incurred by an ordinarily prudent person in the conduct of competitive business. The cost should be consistent with what is normally paid for the same goods/services when purchased with money other than grant funds. In considering "reasonableness", a comparative analysis of costs in other grants and object classes within the proposal may be helpful.

Allowable – A cost is allowable if it is reasonable, allocable and the Government is not prevented from paying for it by the cost principles listed in OMB Circular A-87 for state and local governments, or A-122 for non-profit organizations.

Examples of allowable expenses are accounting services, bonding, maintenance and repair. Allowable cost examples, with approval of grant agency, are ADP system acquisition, or insurance expenses. Examples of unallowable costs include contributions and donations, luncheons, entertainment, bad debts, fines, penalties and claiming more indirect costs than the negotiated approved rates.

Also, expenses of state and local government must meet certain additional conditions to be allowable under Federal grant programs. They may not be a general expense required to carry out overall responsibilities of state and local government. They must also be authorized (or not be prohibited) under state and local laws, and they must conform to limitations set forth in Federal or other governing laws as to types and amounts of cost items. [Appendix C](#)  provides a more detailed listing of the types of state and local government costs that are considered allowable and unallowable.

The previous discussion of cost principles identified the importance of properly assigning costs to the grant. To do this, applicants need to understand the distinctions between **“direct”** and **“indirect” costs**. This understanding is crucial in developing program budgets that are consistent with any limitations on types of expenses that a grantor like DOL/VETS may establish. These terms are defined below.

Direct Costs – Direct costs are those that can be specifically identified with a particular cost objective. Typical direct costs are for compensation of employees for time devoted specifically to the grant-funded activities (i.e., personnel costs), materials required, consumed or expended specifically for the grant program, equipment and other approved capital expenditures, services furnished by other agencies specifically for the grant program, or other expenses incurred specifically to carry out the Grant Agreement. It is important for applicants to understand that direct costs for the administration of the grant program, plus any indirect charges claimed, **should not exceed 20 percent of the total amount of the grant** without strong justification from the eligible applicant (and approval of DOL/VETS – specifically, the OASVET).

Administrative costs include all direct and indirect costs associated with the supervision and management of the grant-funded program.

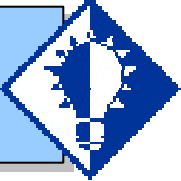
Indirect Costs – Indirect costs are those costs incurred that cannot be charged to and are not readily assignable to any one cost objective. Federally approved indirect cost rates are negotiated by the “cognizant Federal agency” for the grantee. This is usually the agency that provides the grantee with the most grant funds. In the case where DOL is the applicant’s cognizant agency, the Office of Cost Determination is responsible for


negotiating the indirect cost rate. Note that the following types of questions will guide the review of the cost proposal's indirect rates:

- Does the applicant have a current indirect cost rate (or at a minimum, a provisional rate which covers the proposed grant period)?
- Is the rate that the applicant is proposing to charge equal to or less than its provisional or final overhead rate?
- Is the applicant charging costs that are already covered by its direct rates to a direct cost? (For example, some grantees may include rent as an indirect charge, and therefore it may not be charged as a direct cost).



The applicant must submit a copy of the negotiated, approved, and signed indirect cost negotiation agreement with the grant proposal. If the applicant does not currently have an approved indirect cost rate, a proposed rate with justification may be submitted. Successful applicants will be required to negotiate an acceptable and allowable rate with the DOL Office of Cost Determination within 90 days of grant award.

Proposals to obtain an approved indirect cost rate are submitted to DOL's Office of Cost Determination. More information on the process is available on-line.
<http://www.dol.gov/oasam/programs/boc/ocd-guide-main.htm>



In addition to adhering to the cost principles outlined in OMB Circulars A-87 and A-122, applicants should ensure that cost proposals are both **accurate and consistent**. Reviewers of the cost proposal will examine the budget for accuracy, including ensuring that all calculations are correct. Reviewers will also review the specific costs for each budget category for consistency with the program narrative, goals and objectives and other related segments of the proposal. Additional guidelines for development of the Budget Narrative are noted in **Section 3.4.4**  below.

3.4.2 Guidance on Completing the SF-424

The SF-424 <http://www.whitehouse.gov/omb/grants/SF424.pdf>  is a standard form used by applicants for Federal government grants. The form contains summary information on the applicant and the proposed program. The SF-424 is also used for modifications to a grant, particularly when there is a change in funding levels. (See **Chapter Seven**  of this Guide for further discussion of use of the SF-424 in these cases.)


Although the information requested on the SF-424 is fairly basic, errors on this form are common. The form requires several pieces of information, and Appendix A provides a detailed, item-by-item description of the elements required. It is recommended that applicants review these step-by-step instructions as the form is completed. Applicants will thus avoid common errors that could result in the applicants being considered unresponsive to the SGA.

3.4.3 Guidance on Completing the SF-424A

Detailed budget information on costs for the applicant's grant program is submitted on another standard form, the SF-424A <http://www.whitehouse.gov/omb/grants/SF424a.pdf> 

The form consists of six sections:

- Budget Summary;
- Budget Categories;
- Non-Federal Resources;
- Forecasted Cash Needs;
- Budget Estimates of Federal Funds Needed for Balance of Project; and
- Other Budget Information.

Each section of the form is described fully in [Appendix B](#).  It is recommended that applicants review [Appendix B](#) while completing the form.

3.4.4 Guidance on Preparing the Budget Narrative

In addition to the information solicited on the SF-424A, Budget Information Form, DOL/VETS requires applicants to provide additional material representing a Budget Narrative. The Budget Narrative provides a detailed cost breakout of each line item contained in the Budget Information Sheet, SF-424A. On separate sheets, attached to the Budget Information Form, the applicant must provide:

- A calculation reflecting the percentage of requested grant funds that will be used for administrative costs. Administrative costs include all direct and indirect costs associated with the supervision and management of the program. These costs should include the administrative costs, both direct and indirect, of recipients and sub-recipients of the grant funds;
- A breakout of all personnel costs by position title, salary rates, and percent of time of each position to be devoted to direct program/services and administration;

- An explanation and breakout of fringe benefit rates and associated charges if they exceed 35 percent of wages and salaries;
- A specification of and justification for any proposed equipment purchases. Note that any non-expendable personal property with a unit acquisition cost of \$5,000 or more and a useful life of two or more years must be specifically identified;
- A brief explanation of the proposed costs for travel, equipment, supplies, sub-grants, contracts, and other costs. The applicant should provide any formulas used to determine travel costs and explanations of the purpose of such travel. (For example, for mileage costs in excess of \$.36 per mile – or the approved Federal rate – documentation must be provided). Note that for planning and budgeting purposes, the applicant can assume a five-day trip to Washington, DC, for the Post-Award Conference. Costs associated with attending this conference for up to two grantee representatives will be allowed as long as they are incurred in accordance with Federal travel regulations. Such costs must be charged as administrative costs and reflected in the proposed budget;
- A demonstration of how estimated costs were determined; for example, how many trips will be made, using what mode(s) of transportation, at what cost per trip, or what supplies are to be purchased, for what program-related purpose, and how are costs were obtained for these supplies; and
- An identification of all sources of matching contribution, if obtained, including both cash and in-kind.

This information and the dollar amounts provided in this budget backup must be consistent with (and, therefore, easily matched with) the amounts shown in Section B (Budget Categories) of the Budget Information Form (SF -424A).

3.4.5 Guidance on Completing the Assurances and Certifications Signature Page

The final portion of the cost proposal consists of the Assurances and Certifications form. The form (available as an attachment to the SGA) should contain an original signature of an authorized official of the applicant organization. In signing the form, the applicant certifies to a number of important conditions:

- Certification regarding lobbying, Debarment, Suspension, Other Responsibility Matters (e.g. Drug-Free/Tobacco-Free workplace);
- Certification of Release of Information;
- Assurances for Non-Construction Programs; and

- Certification that Applicant is not a 501(c)(4) organization.

3.4.6 Final Proposal Checklist

As a final check for an applicant's proposal, a checklist is included here to ensure that common errors are avoided, and that a proposal is complete and accurate prior to submission:

Program Narrative:

- 1) Did you include summary sheets on sub-grantees (if applicable)?
- 2) Does the narrative support the budget, and vice versa?
- 3) Are your program goals listed in the narrative?
- 4) Are your program goals tables completed by quarter?
- 5) Do your sub-grantee goals support the summary goals?

Cost Proposal:

- 1) Does your cost proposal include the budget back up forms?
- 2) Did you double-check the totals included on the Budget Information Sheets and back up?
- 3) If you included match funds in the budget, are they broken out separately?
- 4) Do both the SF-424 and the program narrative support the totals?
- 5) Is a signed Certifications and Assurances page included?

3.5 Special Guidance For Existing/Repeat Grantees

As noted above, when funding permits, VETS may elect to provide an additional year of grant support to HVRP programs. However, this optional year of funding is dependent on the grantee's performance during the initial project period. Specifically, DOL will consider whether:

- The grantee has met a defined percentage of expenditure, enrollment, and placement goals. By the end of the third quarter of the program year, the grantee must meet at least 85 percent of the twelve-month total goals for Federal expenditures, enrollments, and placements; and

- The grantee is in compliance with all SGA terms, including on-time submission of accurate program and fiscal reports.

The submission of the same proposal from any prior year HVRP or Homeless Veterans Employment and Training (HVET) competition does not guarantee a future grant award.



HVRP grantees are required to submit proposals in response to the following year’s SGA, even when requesting an optional year of funding.

3.6 Application Submission Procedures


The grant application package must be received at the designated location by the date and time specified in the SGA or it will not be considered for funding. The SGA contains a number of specific, important guidelines regarding grant packages sent by the U.S Postal Service, and the legibility of the postmark. These are important guidelines in documenting the accuracy of the date of mailing and receipt. For example, any application received at the Office of Procurement Services **after** 4:45 p.m. Eastern Time on the “due date” specified in the SGA **will not be considered**, unless it is received before the award is made and:

1. It was sent by registered or certified mail not later than the fifth calendar day before the published application deadline;
2. It is determined by the Government that the late receipt was due solely to mishandling by the Government after receipt at the U.S. Department of Labor at the address indicated; or
3. It was sent by U.S. Postal Service Express Mail Next Day Service-Post Office to Addressee, not later than 5:00 p.m. at the place of mailing two (2) working days, excluding weekends and Federal holidays, prior to the deadline.

In addition to the U.S. Postal Service, grantee applications may be sent by other delivery services, such as Federal Express or UPS.

3.7 The Application Review Process

Applications for HVRP are received and initially reviewed by the Procurement Service Center staff in the DOL national office to ensure completeness of the application package and overall responsiveness to the SGA. Following this, a DOL panel reviews all applications using a set of

rating criteria set out in the SGA. (See [Section 2.4](#)  for a description of the criteria.) Applicants can also expect that the cost proposal will be reviewed for allowability, allocation of costs, and reasonableness of enrollment and placement costs. After careful evaluation by each panel member, applications are ranked based on the score assigned by the panel. The ranking is the primary basis to identify applicants as potential grantees; however, the panel's conclusions are advisory in nature, and not binding on the Grant Officer. There are several caveats to this review process, as follows:

Grant Officer: A program Grant Officer (GO), representing the Procurement Service Center, is designated for each grant program. The GO is the individual who has the delegated authority from the Secretary of Labor to obligate funds on behalf of DOL. The GO signs the Grant Agreement on behalf of DOL, making it a legally binding instrument.

- Although the Government reserves the right to award on the basis of the initial proposal submissions, the Government may establish a competitive range, based upon the proposal evaluation, for the purpose of selecting qualified applicants.
- The Government reserves the right to ask for clarification or hold discussions with individual applicants, but is not obligated to do so.
- The Government further reserves the right to select applicants out of rank order if such a selection would, in its opinion, result in the most effective and appropriate combination of funding, program and administrative costs, e.g., cost per enrollment and placement, demonstration models, and geographical service areas.
- Although points will not be assessed for cost issues, projected cost per participant that has entered employment will be given serious consideration in the determination of awards.

The Assistant Secretary for VETS makes the final determination about which grant proposals will be funded, and letters of notification of award are sent to applicants (with copies to the DVET). Typically, HVRP grant award notices are sent 45-60 days after the submission date of grant applications. Such notifications constitute the formal, legal grant award, and include both General Provisions and Special Provisions that govern the performance of the grant.

3.8 Post Award Conference

A Post-Award Conference with successful applicants is typically held after each competitive grant competition in order to convey important information about the grant, reporting requirements, and to help establish relationships between grantees and VETS staff. The Post-Award Conference is held as soon as possible, and must be held within 45 calendar days after award notification. Up to two representatives must be present from each grantee; DOL/VETS recommends both a fiscal and a program representative. National state and regional VETS staff participate in the Conference. For illustration, a sample Post-Award conference agenda appears below.

Post-Award Conference Agenda (Sample)

- 1) **Review all operational requirements.**
 - General Provisions
 - Special Provisions
 - Applicable Federal Regulations
 - Reporting Requirements
 - SF269 Financial Report Form
 - SF270 Request for Advance or Reimbursement Form (If applicable)
 - Corrective Action Plan
 - Fiscal and Programmatic goals
 - Answer questions related to operational requirements
- 2) **Discuss the role of:**
 - DVET/ADVET as the GOTR
 - OASVET National Office
 - Grant Officer
- 3) **Discuss plan for administering/monitoring grant including at least one on-site visit during the grant period (Recommended within 120 days of grant award)**
- 4) **Explain Technical Assistance that is available throughout the grant period.**

At the Post-Award Conference, the HVRP grantee can expect to learn key information about the grant, reporting requirements and VETS' ongoing monitoring at the conference. During the Conference, the DVET reviews with the grantee (and sub-grantees if possible) the provisions of the grant. The Post-Award Conference provides the grantee and the DVET/GOTR with an opportunity to:

1. Establish (or build upon) their working relationship. The grantee and DVET/GOTR will work closely together over the term of the grant, so it is important that a good working relationship be established and maintained.
2. Understand the General and Special Provisions of the Grant Agreement and to make sure that grantee understands what is expected over the term of the grant. The Grant Agreement is the contractual document legally binding the grantee and DOL, and contains two important sections:
 - General Provisions (reporting requirements, reimbursement procedures, instructions for seeking modifications, etc.) which govern all grants; and
 - Special Provisions unique to each specific grant.

In order to prepare for the Post-Award Conference, the DVET/GOTR will become familiar with the any special issues or challenges for a particular grant that will need to be carefully monitored during the grant period.

The DVET/GOTR will also use the Post-Award Conference to explain the importance of the Quarterly Technical Performance report, including the type of information expected in the report, and the importance of on-time submission each quarter.

The Post-Award Conference serves an important purpose in helping to establish a cooperative working relationship between the grantee and grantor early on. By helping to ensure that all parties understand the terms and conditions of the grant, the DVET/GOTR and grantee (and sub-grantees) can help to make the remainder of the grant term as trouble-free as possible.

3.9 Summary

This chapter of the VETS Guide has provided detail about the HVRP grant application process and has provided suggestions for both new applicants to the program and existing grantees. The chapter has discussed key items for inclusion in the grant proposal,

especially keeping in mind applicants new to the process. In addition, this chapter has discussed the DOL's application review process and has described the Post-Award conference. The following two chapters provide information on the VWIP grant.







Chapter Four Background and General Information on VWIP

This chapter provides a description of the Veterans' Workforce Investment Program (VWIP), its purpose and background, as well as program mission. After completing this chapter, the reader should have a full understanding of VWIP and the types of services that grantees can provide. In addition, the reader should be aware of eligible program participants and eligible applicants, and have a basic understanding of the criteria used for VWIP grant awards.

4.1 Purpose and Overview of the VWIP Program

The Department of Labor offers competitive grants to provide employment and training services for veterans who meet the eligibility criteria set forth in the Veterans' Workforce Investment Program (VWIP), Section 168 of the Workforce Investment Act, Pub.L. 105-220 (WIA). Section 168 provides that the Secretary will conduct, directly or through grants or contracts, programs that meet the needs for workforce investment activities of veterans who have service-connected disabilities, veterans who served on active duty in the armed forces during a war or in a campaign or expedition for which a campaign badge has been authorized, recently separated veterans, and those veterans with significant barriers to employment. The Veterans' Employment and Training Service (VETS) in DOL administers the program through a bi-annual competitive grant process. (See DOL organization chart in [Section 1.4](#))  Eligible organizations may apply to DOL/VETS for grant dollars to fund program activities that carry out the mission of assisting eligible veterans to re-enter the labor force. In addition to the competitive grants, VETS administers discretionary grant funds under the VWIP program. Discretionary grants are discussed more fully in [Chapter Six](#). 

4.1.1 Program Mission and Basic Objectives

The Veterans' Workforce Investment Program is designed to allow flexibility so that grantees may address any particular local or regional barriers that prevent eligible

veterans from participating in the workforce. To accomplish the mission, VWIP seeks to fulfill two primary objectives:

- To provide services to assist in reintegrating eligible veterans into meaningful employment within the labor force; and
- To stimulate the development of effective service delivery systems that will address the complex problems facing eligible veterans.

VWIP-funded programs assist eligible veterans by providing training, employment and supportive service assistance in areas of high demand occupations. Programs should maximize the eligible veterans' military skills, training, and experience by effectively exploring the transitional or transferable occupational opportunities of the geographical area in which the grant is awarded.

4.2 Eligible Applicants and Participants

4.2.1 Eligible Applicants and Jurisdictions

Competitive VWIP grants are awarded based on the applications submitted in response to the Solicitation for Grant Applications (SGA).⁴ Only one application will be accepted from each state's Governor. Typically, the Governor selects the entity that will apply on behalf of the state. A wide range of state and local agencies and organizations that are familiar with their areas and the population to be served and can administer an effective program may submit an application. A transmittal letter signed by the Governor of the state or his/her designee must accompany the application, and must contain a statement that the applicant is authorized to act on behalf of the Governor and administer the VWIP. Once an applicant receives a funding award and enters into a Grant Agreement with DOL, the applicant becomes a "grantee." The following categories describe the types of entities eligible to apply for competitive VWIP grants:

- ***State and Local Workforce Investment Boards (WIBS)*** as defined in Section 111 and 117 of the Workforce Investment Act.
- ***Local public agency***, meaning any public agency of a general purpose political subdivision of a state which has the power to levy taxes and spend funds, as well as general corporate and police powers. (This typically refers to cities and

⁴ See Chapter Six for more information on discretionary grants under VWIP.

counties.) A state agency may propose in its application to serve one or more of the potential jurisdictions located in its state. This does not preclude a city or county agency from submitting an application to serve its own jurisdiction.

- **Private non-profit organizations** that have operated an employment or training program for eligible veterans and have proven a capacity to manage grants and have or will provide the necessary linkages with other service providers. Private non-profit organizations may include faith-based and community organizations.⁵

A VWIP grantee may “**sub-grant**” part of its grant award to a sub-grantee to carry out specific program activities. **Sub-grants** can assist applicant organizations to demonstrate specific additional capacity and expertise to meet the employment needs of eligible veterans. The requirements for potential sub-grantees are essentially the same as for grantee organizations and may include experienced public agencies, private non-profit organizations, and private businesses and faith-based and community organizations that have an understanding of unemployment and the barriers to employment unique to veterans, a familiarity with the area to be served, and the capability to effectively provide the necessary services.


The **VWIP funding level**– and the total number of grants awarded – vary from year to year. In recent years, awards have averaged \$400,000. DOL/VETS also specifies in each SGA a maximum grant amount, and requests exceeding this specified amount are considered non-responsive.

4.2.2 Participant Eligibility

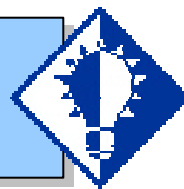
DOL/VETS specifically defines who is eligible to receive VWIP-funded services. Eligible program participants include campaign veterans, veterans who have service-connected disabilities, veterans who are recently separated, or veterans with significant barriers to employment, as defined below:

- The term “veteran” means a person who served in the active military, naval, or air service, and who was discharged or released there from under conditions other than dishonorable. [Reference 38 U.S.C. 4101(2)]

⁵ Entities described in Section 501(c)(4) of the Internal Revenue Codes that engage in lobbying activities are not eligible to receive funds from VWIP as Section 18 of the Lobbying Disclosure Act of 1995, Public Law No. 104-65, 109 Stat. 691, prohibits the award of Federal funds to these entities.

- The term "Campaign veteran" - refers to any veteran who served on active duty in the United States armed forces during a war or in a campaign or expedition for which a campaign badge has been authorized. A list of the wars, campaigns and expeditions can be found at the Office of Personnel Management website at <http://www.opm.gov/veterans/html/vgmedal2.htm>. 
- The term "service-connected disabled" - refers to (1) a veteran who is entitled to compensation under laws administered by the Department of Veterans' Affairs (VA), or (2) an individual who was discharged or released from active duty because of a service-connected disability. (29 U.S.C. 1503(27)(B)).
- The term "recently-separated veteran" - refers to any veteran who applies for participation in a VWIP funded activity within 48 months after separation from military service. (29 U.S.C. 2801 (49))

In designing and developing activities to be funded under VWIP, local organizations should ensure that services are targeted to the particular population of **eligible veterans**.



4.3 Types of Services that VWIP Can Fund

VWIP grantees provide an array of services – directly or through linkages and partnerships (discussed further below) in the local community – focused on the end goal of enhancing the employability of eligible veterans. The following program features and activities are required for a VWIP-funded program.

- **Pre-Enrollment Assessments:** A VWIP-funded program must provide a pre-enrollment assessment to eligible program applicants. These assessments are intended to allow the grantee program staff to evaluate the participant's skills and barriers to employment and assess his/her employability needs. Results of the assessment should allow the grantee program to enroll participants in the appropriate services, or to refer the participant to other necessary supportive services. Applicants for the VWIP Grant are encouraged to use the Disabled Veterans Outreach Program (DVOP) Specialists and Local Veterans' Employment Representative (LVER) staff for the pre-enrollment assessment. In the proposal, the grant applicant should identify the means for conducting the assessments, and how the information obtained through the assessments will be used.

- **Employment Development Plan:** An Employment Development Plan (EDP) must be completed for all veteran participants in a VWIP-funded program. The EDP should accomplish several goals: 1) document the assessments completed regarding the skills and interests of the participant; 2) substantiate the participant's minimum income needs; and 3) identify barriers and skill deficiencies and describe the services needed and the competencies to be achieved by the participant as a result of program participation. Applicants for the VWIP grant are encouraged to use the Disabled Veterans Outreach Program (DVOP) Specialists and Local Veterans' Employment Representative (LVER) staff for the EDP process. The grant application should describe the program's proposed EDP process.
- **Core Training Activities:** At least 80 percent of participants enrolled in a VWIP-funded program must receive some form of "core training." Core training activities are employment-focused interventions that address basic vocational skills deficiencies that prevent the participant from accessing appropriate jobs or occupations. Core training activities include, but are not limited to:
 - **Classroom training.** Classroom training is conducted in an institutional setting and is designed to provide individuals with either technical skills or other information to help them gain employment or to perform a specific job. This type of training may also include that designed to enhance the employability of individuals by upgrading basic skills through the provision of courses such as remedial education, basic literacy instruction; or English-as-a-Second Language instruction;
 - **On-the-job training.** On-the-job training (OJT) is training by an employer that is provided to a participant while engaged in productive work in a job that: (a) provides knowledge or skills essential to the full and adequate performance of the job; (b) provides reimbursement to the employer of up to 50 percent of the wage rate of the participant for the extraordinary costs of providing the training and additional supervision related to the training; and (c) is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate. Typically the OJT agreement includes a promise that the employer will hire the individual upon successful completion of the training;

- **Institutional skills training.** Institutional skills training is typically conducted in an institutional setting and is designed to ensure that individuals acquire the skills, knowledge and abilities necessary to perform a job or group of jobs in an occupation for which there is a demand.
- **Occupational skills training.** This type of training includes both 1) vocational education designed to provide individuals with the technical skills and information required to perform a specific job or group of jobs and 2) on-the-job training.
- **On-site industry specific training.** This training is specifically tailored to the needs of a particular employer and/or industry. Participants may be trained according to specifications developed by an employer for an occupation or group of occupations at a job site. This type of training is typically presented to a group of participants in an environment or job site representative of the actual job or occupation, and similar to “on-the-job” training, there is often an obligation on the part of the employer to hire a certain number of participants who successfully complete the training.
- **Customized training.** Customized training is a training program designed to meet the special requirements of an employer who has entered into an agreement with a Service Delivery Area to hire individuals who are trained to the employer’s specifications. The training may occur at the employer’s site or may be provided by a training vendor able to meet the employer’s requirements. Such training usually requires a commitment from the employer to hire a specified number of trainees who satisfactorily complete the training.
- **Apprenticeship training.** This type of training is a formal occupational training program that combines on-the-job training and related instruction and in which workers learn the practical and conceptual skills required for a skilled occupation, craft or trade. This type of training may be registered or unregistered.
- **Upgrading training.** This type of training is provided to an individual who needs advancement training in order to move beyond an entry-level or “dead-end” position. This training includes assisting participants in acquiring necessary state certification to be employed in the same field as they were trained in the military. These certifications might include, for example, commercial truck driving license (CDL), emergency medical

technician (EMT), airframe and power plant (A&P), teaching certificate, etc.

- **Job Placement and Follow up services:** The goal of job placement services is the placement of each eligible veteran into meaningful, gainful employment that allows the veteran to become self-sufficient. These services may involve activities such as job search assistance, training or job development, and are intended to enhance and expedite the participant's transition from training activities into employment. VWIP programs are required to provide post placement follow up services, which includes tracking a participant's progress and status after initial placement. Follow up is required at both 90 days and 180 days after job placement. The VWIP proposal should describe how the grant applicant will provide these services. Applicants for the VWIP grant are required to use the Disabled Veterans Outreach Program (DVOP) Specialists and Local Veterans' Employment Representative (LVER) staff for both job placement and follow up.

VETS strongly encourages, and for some aspects of the program, requires grantees to utilize the services of the local **Disabled Veterans' Outreach Program (DVOP) and Local Veterans' Employment Representatives (LVER)** in the provision of a variety of VWIP services. VETS provides grant funds to each state's employment service to support DVOP specialists in the state. The role of DVOP specialists is to develop job and training opportunities for veterans, with special emphasis on veterans with service-connected disabilities. DVOP specialists provide direct services, work with employers, veterans' organizations, Departments of Veterans Affairs and Defense, and serve as case managers for veterans enrolled in federally-funded job training programs. LVERs are state employees located in state employment service local offices to provide assistance to veterans in job development and placement and obtaining needed services.

Because DVOPs and LVERs are charged with making connections with employers, developing job opportunities and providing case management for veterans searching for employment, it is important that VWIP grantees connect with these specialists and tap into the services they provide.

- **Case Management:** Case management services should be available in order to support more intensively the veteran participant, with the goal of providing additional assistance and support in job training and transition into employment. Case management is a client-centered approach in the delivery of services, designed to prepare and coordinate comprehensive employment plans for participants, to assure access to the necessary training and supportive services, and to provide support during program participation and after job placement. The case manager acts as a facilitator in assisting the participant toward a successful completion of training and placement into employment.

VWIP tries to enhance the employment and training services that it funds directly by promoting **linkages and coordination** with veterans services programs and organizations, including:

- State Workforce Agencies, the workforce development system's One-Stop Centers, or other VWIP Veterans' Employment Programs;
- Department of Veterans Affairs (VA) services, including its education programs; and
- Veterans' service organizations, such as The American Legion, Disabled American Veterans (DAV), Veterans of Foreign Wars (VFW), Vietnam Veterans of America (VVA), and American Veterans (AMVETS).

4.3.1 Emphasis on Achieving Results

With the introduction of the Government Performance and Results Act (GPRA) in the 1990s, Congress and the public are increasingly focused on program *results* rather than process. Applicants are thus encouraged to design VWIP-funded activities that are responsive to local needs, and will meet the objectives of the program to successfully reintegrate eligible veterans into the workforce – i.e., programs that are “results-oriented.” While placement into jobs should remain a primary positive outcome for VWIP grantees, grantees are also required to measure results for at least six months after placement in order to assess retention of employment. This measurement can indicate whether the VWIP program is achieving long-term success.

Each VWIP-funded activity should be approached from the perspective of how can it be designed and implemented to achieve measurable results. For example, VWIP grantees should strive to:

- Conduct outreach at a level that is sufficient to reach and enroll eligible veterans;
- Establish contact with other agencies that encounter veterans;
- Assess the abilities, interests and needs of potential participants, referring them – where needed – to services such as social rehabilitation, drug or alcohol treatment or a temporary shelter to stabilize them before they are enrolled into core training;
- Once supportive services are in place, focus assessments on the employability of the participants with the development of an Employment Development Plan;

- Determine whether the participants would benefit from pre-employment preparation such as resume writing, job search workshops, related counseling and case management;
- Determine whether the participants would benefit from entry into the job market through temporary jobs, job development, or entry into classroom or on-the-job training;
- Promote direct entry into full-time employment in keeping with the objective of VWIP to bring the participant closer to self-sufficiency; and
- Conduct follow-up to determine whether the veteran is in the same or similar job at the 90- and 180-day period after entering employment.

It is important that the grantee maintain contact with veteran participants after placement to assure that employment-related problems are addressed. This follow up is fundamental to assessing program success, and is reported in the 90 and 180 day technical performance reports.



**Exhibit 4.1
A Results-Oriented Model of VWIP**



VWIP grants are initially awarded for twelve months. A results-oriented model provides VWIP grantees with the framework to maximize their chances of achieving the desired outcomes within this twelve-month grant period. Achieving positive outcomes is important not only for fulfilling initial program goals, but also for making a grantee eligible for additional funding, when conditions allow. When funding permits, DOL/VETS may

exercise the option to provide optional years of grant support to VWIP programs. (Note that the Federal Government does not, however, guarantee additional year funding for any grantee.) Should DOL/VETS decide to offer an optional year of funding, the grantee's performance during the most recent period of VWIP grant program operation will be considered as follows:

1. By the end of the third quarter of the program year, the grantee must meet at least 85 percent of the twelve-month total goals for Federal expenditures, enrollments, and placements; and
2. The grantee must be in compliance with all terms identified in the solicitation for grant applications; and
3. The grantee must have submitted all program and fiscal reports by the established due date (such reports may be verified for accuracy).


4.3.2 Related VWIP Program Development Activities

It is important for VWIP grantees to promote linkages between the grantee and local service providers in order to eliminate gaps or duplication in services and to enhance provision of assistance to program participants. Outreach to other service providers also helps to increase awareness of and access to employment-related services available to eligible veterans, and to familiarize other providers with the needs of veterans. In order to create these linkages, VWIP grantees must provide orientation and/or service awareness activities to local service providers in their jurisdiction. Project orientation workshops conducted by grantees can be an effective means of sharing information and revealing the availability of other services; such workshops are encouraged but not mandatory. Rather, a grantee has the flexibility to design its own strategy to share information, perform outreach and connect to other local providers. A grantee's strategy may include attending service provider meetings, seminars, conferences, out-stationing staff, developing individual service contracts, and involving other agencies in program planning. At a minimum, however, as a part of their linkage activities, the grantees are responsible for providing appropriate outreach, information sharing, and orientation activities to the following types of organizations (this list is not exhaustive):



- Providers of direct services to eligible veterans.
- Federal, state and local entitlement services such as the Social Security Administration (SSA), Department of Veterans Affairs (VA), State Workforce Agencies (SWAs) and their local Job Service offices, One-Stop Centers (which

- integrate Workforce Investment Act organizations, labor exchange, and other employment and social services), detoxification facilities, etc.
- Civic and private sector groups, and especially veterans' service and community-based organizations (including faith-based organizations).

4.4 Rating Criteria for Awards

DOL/VETS uses a set of criteria to review and evaluate applications for VWIP grant funds. While these are explained more thoroughly in the discussion on application development in [Chapter Five](#),  this section provides a general introduction. The SGA details these criteria and it is important for the applicant to understand the elements of each and their relative weights. These criteria provide the blueprint for what DOL/VETS is looking for in VWIP-funded programs and the basic design of an effective program. The criteria and relative points for each element may vary from year to year, and applicants should review the SGA carefully for a full description. The criteria and potential point assignments include, for example:

- Need for the Project: 15 points
- Overall Strategy to Increase Employment and Retention: 40 points
- Quality and Extent of Linkages with Other Providers of Services to Veterans: 10 points
- Demonstrated Capability in Providing Required Program Services: 20 points
- Quality of Overall Employment and Training Strategy: 15 points

In addition, DOL/VETS reviews applicant cost proposals along with the narrative description of the proposed program. DOL/VETS considers several factors in review of program costs, including allowability, allocation of costs, and reasonableness of placement and enrollment costs. More details on the development of responsive grant applications and the panel review process may be found in [Section 5.2](#)  "The VWIP Application Process" and [Section 5.7](#)  "The Application Review Process."

4.5 Summary

This chapter has provided background information on VWIP and the program emphasis. Within the general flexibility that the VWIP grant offers, grantees can design a range of program elements that respond to local needs. This chapter has also emphasized a

number of important elements that should be present in VWIP grant programs such as linkages and coordination with other providers in order to maximize services and avoid duplication of efforts. Finally, the chapter has highlighted the importance for grantees to achieve their performance targets in order to attain the greatest results in moving eligible veterans into employment, as well as to qualify for potential additional funding.





Chapter Five

The VWIP Grant Application and Award Process

This chapter describes the process for applying for Veterans' Workforce Investment Program (VWIP) funds. The chapter includes guidance on the overall content of the grant application, or proposal, as well as specific instructions for how to complete particular sections of the proposal package. The final section of the chapter describes the application review and grant award processes, and project start up. Special guidance for both new and existing applicants is also highlighted.

5.1 Special Guidance for New and Existing VWIP Applicants

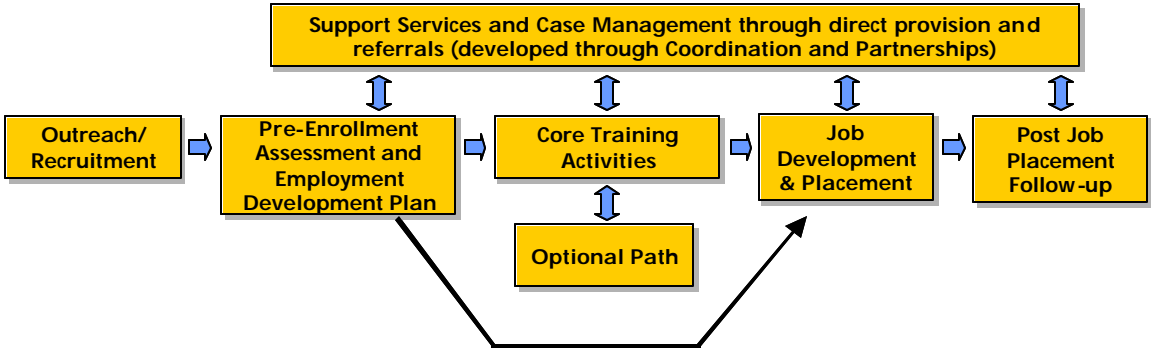
Organizations eligible to apply for a VWIP grant can begin to think about how to structure a VWIP-funded program early, well before the publication of the Solicitation for Grant Applications (SGA). The deadline for submitting an application for VWIP funds is typically 30-45 days after the date of publication of the funding announcement. Proposal preparation can take a significant amount of time, thus beginning the process early can allow an applicant enough time to pull together information, design a responsive program, and identify potential sub-grantees and other service providers with which to partner.

An understanding of the primary goals of the VWIP grant and the basics of program design can help a new applicant to begin designing its program. Although these points are mentioned particularly with the new applicants in mind, they are important for **all applicants**— those that have never applied for the grant, and those that have received funding in the past.

Basics of Program Design: Although a VWIP-funded program can be flexible in its approach to serving the employment needs of veterans, it must provide a number of specific services. These services include an outreach, intake and assessment component in order to attract and enroll eligible participants. Coordination with other providers that serve veterans is key: VWIP-funded programs must have in place effective partnerships

with other veteran and employment and training organizations. Finally, the VWIP-funded program must provide effective employment and training services. For these, an array of services can be available, ranging from job placement to classroom training, to on-the-job training or work experience. Placement follow-up services are also an essential element to VWIP programs, as the program emphasis is not only on job placement but retention of employment. Exhibit 5.1 depicts one possible design for organizing a mix of VWIP services and the possible path that participants may follow.


Exhibit 5.1
Sample Design for VWIP Program Services



Increasing the Competitiveness of An Application: For both new applicants and existing grantees applying for a VWIP grant, there are a number of ways to help increase the competitiveness of the application. First, it is important to read and understand fully the SGA and the requirements described. Most especially, applicants should pay attention to the rating criteria in order to ensure that the grant program responds to these particular standards. In addition, the applicant must demonstrate an understanding of the employment and training needs of eligible veterans in their particular area, and present a program that will meet those needs while being responsive to the SGA requirements. The VWIP program, as described in Chapter Four, has several mandatory program components. Applicants should ensure that their program design encompasses all of these program elements. Finally, an applicant should keep in mind that the organization must be able to get a program up and running as soon as a VWIP grant is awarded; thus, demonstrating relevant past performance and the organizational capability and ability to implement a new program immediately is key.


Challenges Faced by New Applicants: New applicants to the VWIP program face particular challenges. These include, for example, having in place sufficient linkages with

other providers and developing realistic goal projections. In order to respond to the rating criteria, programs must have in place sufficient linkages with other service providers as described above. These partners can be essential in providing necessary supportive services, such as social or health-related services to program participants. In addition, new applicants should give careful consideration to realistic projections for program participant goals and outcomes as well as the rate of expenditure of grant funds over the program year. For example, in terms of projection of goals for the VWIP-funded activities, it is likely that expenditures for each quarter will not be equal as the initial start-up period (the first program quarter) may require an extra investment of grant funds, or alternatively, spending during the first quarter may be less than the average cost per quarter. Similarly, for participant goals such as job placements, the number of placements per quarter might vary, with an initial start-up period with fewer placements, followed by an increase in the rate of placements in subsequent quarters.

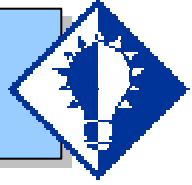
Anticipating Reporting Requirements: New VWIP applicants should keep in mind the mandatory reporting required of grantees. A format for reporting is provided in the SGA; the new applicant should become familiar with the reporting format and should be prepared to develop internal systems to track the information required as soon as a program begins. In addition, applicants should be aware of required attendance at the “post-award conference” (discussed more fully in [Section 5.8](#)  below).

5.2 The VWIP Application Process

5.2.1 Solicitation for Grant Applications (SGA)

The VWIP grant application process begins with the issuance of the SGA by DOL/VETS. The SGA is published electronically on the Federal government’s grants website, at <http://www.grants.gov>.  The SGA announces the availability of VWIP funds for competitive award, and provides information to potential applicants about the funding levels for the current grant round and process for application. Even for experienced grantees, it is important to read the SGA carefully and thoroughly because there may be changes in the program design or applicant requirements between funding rounds. The SGA is typically issued bi-annually and is available on-line. In addition, VETS usually posts a notification on the DOL/VETS web site indicating the availability of the SGA. Often, SGAs are published in the spring.

Organizations interested in applying for VWIP grants should monitor the DOL/VETS website closely in order to be able to prepare a timely response to any SGA issued.





Information in the SGA: The SGA for VWIP grants contains detailed information on program design and application requirements. The SGA will typically describe the following:

- Eligible applicants;
- Types of activities allowable under the grant;
- Mandatory program features;
- Particular program emphasis of the Office of the Assistant Secretary for VETS (OASVET);
- Criteria used in making awards;
- Program year funding levels;
- Number of grantees that may receive awards;
- Typical grant amount;
- Matching funds requirements, if applicable;
- Period of performance (i.e., the program year, which runs from July 1 through June 30);
- Deadline for submission; and
- Appropriate method of submission.

The SGA also describes and contains a number of **required forms** that must be completed and submitted as part of the application package.

To aid in preparing your application, the following sections provide general guidance on the preparation of each component of the VWIP proposal. As described in the SGA, a proposal for VWIP grant funds must contain a number of elements. These include:

- A transmittal (or cover) letter;
- A technical proposal which includes:
 - Program narrative.
- A cost proposal which includes:
 - SF-424 form, Application for Federal Assistance (detailed instructions on completion of this form appear in **Appendix A**); 
 - SF-424A, Budget information sheet (detailed instructions on completion of this form appear in **Appendix B**); 

- Budget narrative; and
- Assurances and Certifications form.

5.3 The Technical Proposal

5.3.1 Transmittal Letter

The cover letter accompanying the grant application is called a *transmittal letter*. The letter must contain the following:

- Clear certification that the applicant is an “eligible entity”;
- An **original** signature of the Governor of the state or his/her designee who has the authority to enter into a Grant Agreement between the Department of Labor and the grant recipient (blue ink is preferred for the original signature);

5.3.2 Preparation of Part I – Technical Proposal

Program Narrative Format: The SGA outlines the requirements for the program narrative for an application for VWIP funds. The SGA also indicates the specific page limit for this section of the VWIP proposal. Typically, the program narrative is limited to 10 to 15 pages, single-sided, in font size no less than 11 point. The program narrative of the proposal should include three basic sections, as discussed below. In developing the program narrative portion of the proposal, the applicant should keep in mind the rating criteria outlined in the SGA, as these are the key elements on which the proposal is evaluated.

Brief Introduction and Statement of the Problem: This introductory portion of the narrative should briefly describe the proposed program, generally outlining the problems of eligible veterans in the geographic area to be served. This general overview of the applicant’s proposal should:

- Define the geographic area to be served by the VWIP grant;

Rating Criteria for VWIP

Technical Proposals:

- Need for Project
- Overall Strategy to Increase Employment and Retention
- Quality and Extent of Linkages with Other Providers
- Demonstrated Capability in Providing Required Program Services
- Quality of Overall Employment and Training Strategy

Cost Proposals:

- Allowability of Costs
- Allocation of Costs
- Reasonableness of Costs

- Identify the eligible group of veterans to be served (i.e., eligible veterans with employment barriers);
- Identify any subsets of eligible veterans who will receive priority for services (such as minority, female, or disabled veterans); and
- Define briefly and clearly the problems and needs of the targeted population of veterans.

Justification of Need for Proposed Services: Following the initial introduction of the proposed program and the problems the proposed activities will address, the applicant should clearly document the need for the services proposed to be funded by a VWIP grant. This section of the proposal provides a more detailed examination of the problems and needs of veterans in the area, with particular emphasis on the subset of problems that the proposed VWIP grant will address. The applicant must demonstrate a clear understanding of the environment in which the program is to operate, and the specific problem that the program will address (the employment and training needs of eligible veterans). To justify the need for the program, the applicant should not only describe the needs but also present data to support the assertion of needs. In addition, this description must address how the proposed program will add value to the employment and training services currently available in the area. The applicant should ensure that this section covers the following points:

- An estimate of the number or concentration of veterans in the area, especially relative to other similar areas of the jurisdiction;
- A description of the poverty and unemployment rate in the area as determined by census or other surveys, the gaps in local community infrastructure that contribute to the employment or other barriers faced by the eligible veteran population;
- Provide information and data to support the problem statement/needs assessment (e.g. statistical reports and other forms of documentation, including newspaper articles);
- A description of how the proposed program would respond to the needs outlined in terms of the specific services to be offered; and
- A description of the outlook for job opportunities in the area served by the program.

Exhibit 5.2 Approach to Addressing Needs



Proposed Approach: Statement of Work, Management Plan and Program Goals: In this section of the proposal, the applicant presents information about how the VWIP-funded activities will be carried out, and defines the goals and objectives of the proposed program. The applicant also demonstrates its organizational capacity to carry out the proposed services.

In defining the approach to provide the VWIP-funded services, the applicant should demonstrate a clear, logical relationship between the problem statement and needs assessment, the services to be provided, and the proposed program approach and activities. Exhibit 5.2 above illustrates the direct relationship that should exist between the problem and needs of eligible veterans and the program approach. Further, in describing the approach, the narrative should explain how the proposed program will meet the identified deficiencies or gaps that currently exist in the area's services, and how the program will:

- Provide services beyond and above current services;
- Provide services not normally provided by other employment and training service providers; and
- Represent additional productivity or effectiveness.


In this section of the narrative, the applicant must cover a number of areas in order to be considered responsive to the SGA. These include providing a description of the applicant's strategies to provide a number of key services. The applicant must describe the following:


- The strategy to increase employment and job retention of participants; and
- The strategy to provide supportive services.

Further, to demonstrate its organizational capacity, the applicant must also describe the linkages in place with other organizations to carry out activities considered part of the applicant's approach as well as the applicant's organizational and staff capacity to implement the program. Finally, and most importantly, the applicant must include specific

goals and objectives for its proposed program. Each of these proposal elements is described below.

Approach or strategy to increase employment and job retention: Applicants should describe the program approach to providing comprehensive employment and training services for eligible veterans. As outlined in Chapter Four, the employment training, placement and retention services funded by VWIP can take a variety of forms, including job training, job search assistance, on-the-job experience, job development, employer commitments to hire, placement activities, and post-placement follow-up services. Most importantly, the applicant must describe its strategy to provide the five mandatory program activities: pre-enrollment assessments, Employment Development Plan, Core Training Activities, Job Placement and Case Management. In describing the strategy, applicants should address the intent to target occupations in expanding industries, rather than those in decline. In addition to describing the services to be provided, the applicant should identify the local human resources and sources of training to be used for participants as part of the strategy, and of the relationship, if any, with other employment and training programs. The applicant should indicate how the activities will be tailored or responsive to the needs of eligible veterans in the particular geographic area as detailed in the “Needs” section of the proposal. Finally, the applicant should describe the plan for job retention of participants after 90 and 180 days after entering employment.

The narrative should provide specifics about the activities to be provided. Applicants should describe, for example, the types of training, the length of training, detail about the curriculum, and information on how the training will enhance employability. In addition, if classroom training is to be offered, the applicant should describe the type(s) of training, the occupation for which training will occur, and the duration of the training. For on-the-job training, the applicant must include the wage rate formula to be used to pay for positions. [Unless otherwise indicated, it is assumed that the [DOL’s Occupational Information Network \(O*Net\)](http://www.doleta.gov/programs/onet/onet_default.asp) (http://www.doleta.gov/programs/onet/onet_default.asp)  will be used to determine both wages and the length of training.]

The applicant may use a “participant flow chart” to illustrate how participants may access the mix of services available, and how these services may be sequenced to better meet the individual needs of participants. See for example, the sample design of services in [Exhibit 5.1](#)  above.

Emphasis on job retention is key to a strong VWIP-funded program, and is accentuated in the rating criteria in the review of proposals. For example, applicants with strategic plans that support a 70 percent outcome of six-month retention are awarded more points in the application review process than applicants who plan for a lower retention rate.



Supportive services strategy: VWIP applicants should describe how supportive or “ancillary” services will be accessed and used by participants. Applicants should describe how the resources will be used and explain why they are necessary. In order to assist participants to overcome barriers to employment, applicants should demonstrate its strategy to provide necessary supportive services that will support the veteran in the process to becoming self-sufficient. Services include, for example, social, health or mental health services, transportation, childcare and housing assistance. A program may offer these services, or may provide referrals to other service providers.

Linkages with providers of services outside of VWIP grant and with other Federal agencies:

The applicant should ensure that the narrative fully describes its network of linkages with other service providers in the area, including programs of other Federal agencies, in order to accomplish its strategies for employment, training and retention as well as supportive services. The applicant should describe the relationship with other providers, the type of linkage or referral system in place, and the source of funding for these providers. The narrative should include:

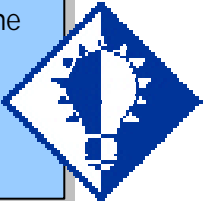
- A description of the types of agreements (such as Memoranda of Understanding or Agreement) that govern these relationships;
- A description of the applicant’s relationships with the Disabled Veterans’ Outreach Program (DVOP) and the Local Veterans’ Employment Representative (LVER) program and how these resources will be utilized in carrying out the proposed VWIP-funded program;
- A description of other available programs under the Workforce Investment Act and the types of services available; and
- A description of linkages with the workforce development system including the State Workforce Agency.

Organizational capacity: In order to demonstrate the organization’s capability to carry out the proposed program, the applicant should: address its capacity for timely start-up of the

program; describe its staff capability to manage the activities⁶ and the financial aspects; and include a recent financial statement as an attachment (or audit, if available). The applicant should show how its current or previous experience in operating employment or training programs is relevant to the proposed VWIP-funded program. If sub-grantees are to be used as part of the proposed program, their relevant experience should also be described. Non-profit organization applicants or sub-grantees in particular should submit evidence of satisfactory financial management capability, which must include recent financial and/or audit statements.

As part of its discussion on goals and objectives for the proposed program (see further discussion below), the applicant should detail specific outcomes to be achieved in terms of clients placed in jobs, proposed wage rate and benefits that will be associated with those jobs, and job retention, for example. To demonstrate capacity as well as the reasonableness of the proposed goals, the applicant should describe outcomes of past programs such as enrollments and job placements. If the applicant has operated a VWIP, Job Training Partnership Act (JTPA) IV-C, or other related job training/employment program, the proposal should include the final or most recent technical performance report for each such program as an attachment to the proposal.

If the applicant’s current staff is to be used to provide the services proposed under the grant, the applicant must stipulate that the grant funds will be used to produce additional services, not simply to replace existing services or funds. In other words, VETS’ grant funds are not to be used to fund services already being provided.



Goals and Objectives: One of the most important components of the program narrative is the discussion of the applicant’s participant goals and objectives. When discussing the program’s goals, the applicant should demonstrate that the proposed goals and objectives are both reasonable and attainable. To do so, the applicant should address factors such as past experience in achieving similar goals in similar programs; utilization of staff resources to accomplish goals; and the extent to which the proposed approach and program support the attainment of goals. In addition, the applicant should explicitly discuss how the program goals and objectives support the program emphasis as defined by the Office of the Assistant Secretary for VETS (OASVET) and stated in the SGA, and any applicable strategic plan measurements or outcomes. The applicant should identify specific, numerical program goals by quarter for each of the following (use only the goals table as provided in the SGA):

⁶ Note that resumes of staff may be included in an appendix to the technical proposal and will not be considered in the page count.


- Total number of participants⁷;
- Total number of participants to be placed into unsubsidized employment; and
- Total number of participants to be enrolled in each proposed employment and training activity described in the application.

In addition to demonstrating its numerical goals, the applicant should indicate the projected placement volume and rate for both VWIP participants and participants in other programs funded by match or/in-kind contributions (if the applicant is using match funds). When placement goals are included, the placement rate, cost-per-placement, and job retention goals must be included. Placement rate and cost-per-placement are to be presented separately for the VWIP grant funds and, if applicable (if the applicant is using other funds), match funds. Applicants must provide justification if they exceed the average for cost-per-placement for their respective states.

If the program includes a direct placement component, the types of jobs which participants will be placed in should be identified when possible. (If placement will be performed by another agency, describe the mechanism by which that agency will follow-up on placements and verify job retention.)

In addition to discussing performance targets relative to training, placement and job retention of eligible veterans, this section of the proposal should also specify goals relative to accessing services for those participants; and it should also note any other broader program goals being attempted. For example, as part of the discussion of program objectives, a goal to “increase utilization” of other services (or service providers) must be explained completely. At a minimum, the applicant should describe how the baseline, or beginning point, from which to measure any increase will be determined and how the increase will be measured. In addition, the applicant should identify any non-quantifiable and/or general program goals and objectives (if applicable to the applicant’s proposal). These might include, for example, increasing general knowledge in the community of the employment needs of veterans. The applicant should provide specific points of reference or “benchmarks” to be used in determining if such goals and objectives are being attained, and describe the expected benefits to the targeted veterans to be derived from achieving those goals and objectives.

⁷ Note that a “participant” is an individual who: 1) is determined eligible upon intake; 2) started to receive services; and 3) received more than outreach and/or intake and assessment services.

Finally, the applicant should describe how performance will be tracked and reported to monitor whether or not goals and objectives are being achieved. (See [Chapter Seven](#)  for further discussion of reporting and monitoring grantee performance.)

Guidance for Inclusion of Sub-grantee Information: A VWIP grantee is encouraged to “sub-grant” or “sub-award” part of its grant award to another agency to carry out activities. For the proposal, the applicant must submit a narrative summary of no more than one page for each proposed sub-grantee. For each sub-grantee, the following information is required:

- Name and address of the sub-grantee, including the name of a key person who will be the point of contact and phone number;
- Short statement of work, indicating program approach;
- Quarterly breakout of the participant goals and objectives of the program for the sub-grantee; and
- Budget allocation information.

5.3.3 Additional Notes on the Program Narrative: Other Things to Keep in Mind

Relationship between program narrative and the cost proposal part of the application: Although this Guide contains detailed guidance on completing the cost proposal in the following section and in the appendices, it is important to note that data included in the cost proposal must be fully consistent with the information presented in the narrative. That is, all activities described in the program narrative should be reflected in the budget (the SF-424A) and budget backup, both in terms of the types of activities and the amount and timing of resources to carry them out. The following suggestions should be considered when developing the program narrative relative to the costs of the program:

- Proposed staff activities must be described, and those descriptions must support the percentages of staff time included in the budget.
- If sub-grantees are involved, sub-grantee costs are to be explained as required in the SGA.
- Travel, equipment, supplies, and other charges in the budget, such as mileage rate, must be explained and justified. Who will be traveling? Where? Why? How? What equipment is to be obtained? What supplies are to be purchased?

- Mileage indicated in the budget must be reasonable, based on the geographic area to be covered, the number of planned participants, and other relevant factors.
- All costs reflected in the budget are to be reasonable with respect to the program approach.

5.4 Guidance on Preparing Part 2 – Cost Proposal




The **cost proposal** is the section of the VWIP grant application where the applicant details the financial costs of the proposed program. All costs associated with the proposed program are presented in the cost proposal including personnel costs, travel, equipment, supplies and allocation of sub-award amounts. In addition, if the applicant proposes a funding or in-kind match to the grant, these amounts and their allocation are described.

The cost proposal is comprised of:

- The Application for Federal Assistance form, (Standard Form (SF) 424);
- The Budget Information Sheet (Standard Form (SF) 424A);
- The budget narrative information; and
- The Assurances and Certifications form.

The order of these cost proposal elements is typically the order required by the SGA. The following section presents information on each of these elements of the cost proposal.

5.4.1 Cost Principles for Development of Cost Proposal

Applicants should become familiar with the cost principles described in the Office of Management and Budget (OMB) Circular A-87 “Cost Principles for State, Local and Indian Tribal Governments” (<http://www.whitehouse.gov/omb/circulars/a087/a087-all.html>),  OMB Circular A-122 “Cost Principles for Non-Profit Organizations” (<http://www.whitehouse.gov/omb/circulars/a122/a122.html>),  and/or OMB Circular A-21 “Cost Principles for Educational Institutions and Hospitals” (<http://www.whitehouse.gov/omb/circulars/a021/a021.html>)  in order to prepare a proper and correct budget proposal for a VWIP grant. Although applicants are expected to adhere to the cost standards established by these OMB Circulars, it is also important to keep in mind that there may be other regulations or legislation (Federal, state or local) that take precedence over these principles. These exceptions are generally limited to cases where such rules or laws set higher or more restrictive standards.

The key cost principles included in OMB Circulars A-87, A-122 and A-21 are that costs should be **allocable**, **reasonable** and **allowable**. Applicants must understand what these principles entail, and how these principles should be applied to the cost proposal. These terms are defined below:

Allocable – A cost is considered allocable if it is assignable to a particular objective or activity in accordance with the relative benefits received. Specifically, a cost is allocable to a VETS grant if it:


- Is incurred specifically for the grant;
- Benefits both the grant and other work, but the expenses can be distributed in reasonable proportion to the benefits received by each; or
- Is necessary to the overall operation of the organization, although a direct relationship to any particular cost objective cannot be shown. (A cost objective is a particular function, organizational subdivision or activity for which costs are incurred.)

Examples of allocable costs include personnel and space costs for seminars.

Reasonable – A cost is reasonable if it is generally recognized as both ordinary and necessary for the conduct of the grantee's program or the performance of work under the grant. In addition, a cost is reasonable if, in its nature or amount, it does not exceed amounts that would be incurred by an ordinarily prudent person in the conduct of competitive business. The cost should be consistent with what is normally paid for the same goods/services when purchased with money other than grant funds. In considering "reasonableness", a comparative analysis of costs in other grants and object classes within the proposal may be helpful.

Allowable – A cost is allowable if it is reasonable, allocable and the Government is not prevented from paying for it by the cost principles listed in OMB Circular A- 87 for state and local governments, A-122 for non-profit organizations, or A-21 for educational institutions and hospitals.

Examples of allowable expenses are accounting services, bonding, maintenance and repair. Allowable cost examples, with approval of grant agency, are ADP system acquisition, or insurance expenses. Examples of unallowable costs include contributions and donations, luncheons, entertainment, bad debts, fines, penalties and claiming more indirect costs than the negotiated approved rates.

Also, expenses of state and local government must meet certain additional conditions to be allowable under Federal grant programs. They may not be a general expense required to carry out overall responsibilities of state and local government. They must also be authorized (or not be prohibited) under state and local laws, and they must conform to limitations set forth in Federal or other governing laws as to types and amounts of cost items. [Appendix C](#)  provides a more detailed listing of the types of state and local government costs that are considered allowable and unallowable.

The previous discussion of cost principles identified the importance of properly assigning costs to the grant. To do this, applicants need to understand the distinctions between **“direct”** and **“indirect” costs**. This understanding is crucial in developing program budgets that are consistent with any limitations on types of expenses that a grantor like DOL/VETS may establish. These terms are defined below.

Direct Costs – Direct costs are those that can be specifically identified with a particular cost objective. Typical direct costs are for compensation of employees for time devoted specifically to the grant-funded activities (i.e., personnel costs), materials required, consumed or expended specifically for the grant program, equipment and other approved capital expenditures, services furnished by other agencies specifically for the grant program, or other expense is incurred specifically to carry out the Grant Agreement. It is important for applicants to understand that direct costs for the administration of the grant program, plus any indirect charges claimed, **should not exceed 20 percent of the total amount of the grant** without strong justification from the eligible applicant (and approval of DOL/VETS – specifically, the OASVET). In addition, direct costs for administration **may not exceed 10 percent of the total amount of the grant**.


Administrative costs include all direct and indirect costs associated with the supervision and management of the grant-funded program.

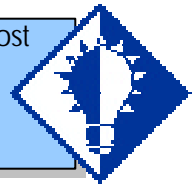
Indirect Costs – Indirect costs are those costs incurred that cannot be charged to and are not readily assignable to any one cost objective. Federally approved indirect cost rates are negotiated by the “cognizant Federal agency” for the grantee. This is usually the agency that provides the grantee with the most grant funds. In the case where DOL is the applicant’s cognizant agency, the Office of Cost Determination is responsible for negotiating the indirect cost rate. Note that the following types of questions will guide the review of the cost proposal’s indirect rates:


- Does the applicant have a current indirect cost rate (or at a minimum, a provisional rate which covers the proposed grant period)?
- Is the rate that the applicant is proposing to charge equal to or less than its provisional or final overhead rate?

- Is the applicant charging costs that are already covered by its indirect cost rate to a direct cost? (For example, some grantees may include rent as an indirect charge, and therefore it may not be charged as a direct cost).



The applicant must submit a copy of the negotiated, approved, and signed indirect cost negotiation agreement with the grant proposal. If the applicant does not currently have an approved indirect cost rate, a proposed rate with justification may be submitted. Successful applicants will be required to negotiate an acceptable and allowable rate with the DOL Office of Cost Determination within 90 days of grant award.

Proposals to obtain an approved indirect cost rate are submitted to DOL's Office of Cost Determination. More information on the process is available on-line.  <http://www.dol.gov/oasam/programs/boc/ocd-guide-main.htm>




In addition to adhering to the cost principles outlined in OMB Circulars A-87, A-122 and A-21, applicants should ensure that cost proposals are both **accurate and consistent**. Reviewers of the cost proposal will examine the budget for accuracy, including ensuring that all calculations are correct. Reviewers will also review the specific costs for each budget category for consistency with the program narrative, goals and objectives and other related segments of the proposal. Additional guidelines for development of the Budget Narrative are noted in **Section 5.4.4**  below.

5.4.2 Guidance on Completing the SF-424

The SF-424 (<http://www.whitehouse.gov/omb/grants/SF424.pdf>)  is a standard form used by applicants for Federal government grants. The form contains summary information on the applicant and the proposed program. The SF-424 is also used for modifications to a grant, particularly when there is a change in funding levels. (See **Chapter Seven**  of this Guide for further discussion of use of the SF-424 in these cases.)

Although the information requested on the SF-424 is fairly basic, errors on this form are common. The form requires several pieces of information, and Appendix A provides a detailed, item-by-item description of the elements required. It is recommended that applicants review these step-by-step instructions as the form is completed. Applicants will thus avoid common errors that could result in the applicants being considered unresponsive to the SGA.

5.4.3 Guidance on Completing the SF-424A

Detailed budget information on costs for the applicant's grant program is submitted on another standard form, the SF-424A. (<http://www.whitehouse.gov/omb/grants/SF424a.pdf>)  The form consists of six sections:

- Budget Summary;
- Budget Categories;
- Non-Federal Resources;
- Forecasted Cash Needs;
- Budget Estimates of Federal Funds Needed for Balance of Project; and
- Other Budget Information.

Each section of the form is described fully in Appendix B. It is recommended that applicants review Appendix B while completing the form.

5.4.4 Guidance on Preparing the Budget Narrative

In addition to the information solicited on the SF-424A, Budget Information Form, DOL/VETS requires applicants to provide additional material representing a Budget Narrative. The Budget Narrative provides a detailed cost breakout of each line item contained in the Budget Information Sheet, SF-424A. On separate sheets, attached to the Budget Information Form, the applicant must provide:

- A calculation reflecting the percentage of requested grant funds that will be used for administrative costs. Administrative costs include all direct and indirect costs associated with the supervision and management of the program. These costs should include the administrative costs, both direct and indirect, of recipients and sub-recipients of the grant funds;
- A breakout of all personnel costs by position title, salary rates, and percent of time of each position to be devoted to direct program/services and administration;
- An explanation and breakout of fringe benefit rates and associated charges if they exceed 35 percent of wages and salaries;
- A specification of and justification for any proposed equipment purchases. Note that any non-expendable personal property with a unit acquisition cost of \$5,000 or more and a useful life of two or more years must be specifically identified;
- A brief explanation of the proposed costs for travel, equipment, supplies, sub-grants, contracts, and other costs. The applicant should provide any formulas used to determine travel costs and explanations of the purpose of such travel. (For

- example, for mileage costs in excess of \$.36 per mile – or the approved Federal rate – documentation must be provided). Note that for planning and budgeting purposes, the applicant can assume a five-day trip to Washington, DC, for the Post-Award Conference. Costs associated with attending this conference for up to two grantee representatives will be allowed as long as they are incurred in accordance with Federal travel regulations. Such costs must be charged as administrative costs and reflected in the proposed budget;
- A demonstration of how estimated costs were determined; for example, how many trips will be made, using what mode(s) of transportation, at what cost per trip, or what supplies are to be purchased, for what program-related purpose, and how costs were obtained for these supplies; and
 - An identification of all sources of matching contribution, if obtained, including both cash and in-kind.

This information and the dollar amounts provided in this budget backup must be consistent with (and, therefore, easily matched with) the amounts shown in Section B (Budget Categories) of the Budget Information Form (SF -424A).

5.4.5 Guidance on Completing the Assurances and Certifications Signature Page

The final portion of the cost proposal consists of the Assurances and Certifications form. The form (available as an attachment to the SGA) should contain an original signature of an authorized official of the applicant organization. In signing the form, the applicant certifies to a number of important conditions:

- Certification regarding lobbying, Debarment, Suspension, Other Responsibility Matters (e.g. Drug-Free/Tobacco-Free workplace);
- Certification of Release of Information;
- Assurances for Non-Construction Programs; and
- Certification that Applicant is not a 501(c)(4) organization.

5.4.6 Final Proposal Checklist

As a final check for an applicant's proposal, a checklist is included here to ensure that common errors are avoided, and that a proposal is complete and accurate prior to submission:

Program Narrative:

- 1) Did you include summary sheets on sub-grantees (if applicable)?
- 2) Does the narrative support the budget, and vice versa?
- 3) Are your program goals listed in the narrative?
- 4) Are your program goals tables completed by quarter?
- 5) Do your sub-grantee goals support the summary goals?

Cost Proposal:

- 6) Does your cost proposal include the budget back up forms?
- 7) Did you double-check the totals included on the Budget Information Sheets and back up?
- 8) If you included match funds in the budget, are they broken out separately?
- 9) Do both the SF-424 and the program narrative support the totals?
- 10) Is a signed Certifications and Assurances signature page included?

5.5 Special Guidance For Existing/Repeat Grantees

As noted above, when funding permits, VETS may elect to provide an additional year of grant support to VWIP programs. However, this optional year of funding is dependent on the grantee's performance during the initial project period. Specifically, DOL will consider whether:

- The grantee has met a defined percentage of expenditure, enrollment, and placement goals. By the end of the third quarter of the program year, the grantee must meet at least 85 percent of the twelve-month total goals for Federal expenditures, enrollments, and placements; and
- The grantee is in compliance with all SGA terms, including on-time submission of accurate program and fiscal reports.

Funding for an optional year may be requested through a Grant Modification request. When applicable, instructions for modifications and a funding announcement are made available to current grantees.


5.6 Application Submission Procedures

The grant application package must be received at the designated location by the date and time specified in the SGA or it will not be considered for funding. The SGA contains a number of specific, important guidelines regarding grant packages sent by the U.S Postal Service, and the legibility of the postmark. These are important guidelines in documenting the accuracy of the date of mailing and receipt. For example, any application received at the Office of Procurement Services **after** 4:45 p.m. Eastern Time on the “due date” specified in the SGA **will not be considered**, unless it is received before the award is made and:

- It was sent by registered or certified mail not later than the fifth calendar day before the published application deadline;
- It is determined by the Government that the late receipt was due solely to mishandling by the Government after receipt at the U.S. Department of Labor at the address indicated; or
- It was sent by U.S. Postal Service Express Mail Next Day Service-Post Office to Addressee, not later than 5:00 p.m. at the place of mailing two (2) working days, excluding weekends and Federal holidays, prior to the deadline.

In addition to the U.S. Postal Service, grantee applications may be sent by other delivery services, such as Federal Express or UPS.

5.7 The Application Review Process

Applications for VWIP are received and initially reviewed by the Procurement Service Center staff in the DOL national office to ensure completeness of the application package and overall responsiveness to the SGA. Following this, a DOL panel reviews all applications using a set of rating criteria set out in the SGA. (See [Section 4.4](#)  for a description of the criteria.) Applicants can also expect that the cost proposal will be reviewed for allowability, allocation of costs, and reasonableness of enrollment and placement costs. After careful evaluation by each panel member, applications are ranked based on the score assigned by the panel. The ranking is the primary basis to identify applicants as potential grantees; however, the panel's

conclusions are advisory in nature, and not binding on the Grant Officer. There are several caveats to this review process, as follows:

- Although the Government reserves the right to award on the basis of the initial proposal submissions, the Government may establish a competitive range, based upon the proposal evaluation, for the purpose of selecting qualified applicants.
- The Government reserves the right to ask for clarification or hold discussions with individual applicants, but is not obligated to do so.
- The Government further reserves the right to select applicants out of rank order if such a selection would, in its opinion, result in the most effective and appropriate combination of funding, program and administrative costs (e.g., cost per enrollment and placement, demonstration models, and geographical service areas).
- Although points will not be assessed for cost issues, projected cost per participant that has entered employment will be given serious consideration in the determination of awards.

Grant Officer: A program Grant Officer (GO), representing the Procurement Service Center, is designated for each grant program. The GO is the individual who has the delegated authority from the Secretary of Labor to obligate funds on behalf of DOL. The GO signs the Grant Agreement on behalf of DOL, making it a legally binding instrument.

The Assistant Secretary for VETS makes the final determination about which grant proposals will be recommended for funding. Letters of notification of award are sent to applicants (with copies to the DVET). Typically, VWIP grant award notices are sent 45-60 days after the submission date of grant applications. Such notifications constitute the formal, legal grant award, and include both General Provisions and Special Provisions that govern the performance of the grant.

5.8 Post Award Conference

A Post-Award Conference with successful applicants is typically held after each grant competition in order to convey important information about the grant, reporting requirements, and to help establish relationships between grantees and VETS staff. The Post-Award Conference is held as soon as possible, and must be held within 45 calendar days after award notification. Up to two representatives must be present from each grantee; DOL/VETS recommends both a fiscal and a program representative. National, state, and regional VETS staff participate in the Conference. For illustration, a sample Post-Award conference agenda appears below.

Post-Award Conference Agenda *(Sample)*

- 1) Review all operational requirements.**
 - General Provisions
 - Special Provisions
 - Applicable Federal Regulations
 - Reporting Requirements
 - SF269 Financial Report Form
 - SF270 Request for Advance or Reimbursement Form (If applicable)
 - Corrective Action Plan
 - Fiscal and Programmatic goals
 - Answer questions related to operational requirements
- 2) Discuss the role of:**
 - DVET/ADVET as the GOTR
 - OASVET National Office
 - Grant Officer
- 3) Discuss plan for administering/monitoring grant including at least one on-site visit during the grant period (Recommended within 120 days of grant award)**
- 4) Explain Technical Assistance that is available throughout the grant period.**

At the Post-Award Conference, the VWIP grantee can expect to learn key information about the grant, reporting requirements and VETS' ongoing monitoring and technical assistance. During the Conference, the DVET reviews with the grantee (and sub-grantees if possible) the provisions of the grant. The Post-Award Conference provides the grantee and the DVET/GOTR with an opportunity to:

1. Establish (or build upon) their working relationship. The grantee and DVET/GOTR will work closely together over the term of the grant, so it is important that a good working relationship be established and maintained.
2. Understand the General and Special Provisions of the Grant Agreement and to make sure that grantee understands what is expected over the term of the grant. The Grant Agreement is the contractual document legally binding the grantee and DOL, and contains two important sections:
 - General Provisions (reporting requirements, reimbursement procedures, instructions for seeking modifications, etc.) which govern all grants; and
 - Special Provisions unique to each specific grant.

In order to prepare for the Post-Award Conference, the DVET/GOTR will become familiar with the any special issues or challenges for a particular grant that will need to be carefully monitored during the grant period.

The DVET/GOTR will also use the Post-Award Conference to explain the importance of the Quarterly Technical Performance report, including the type of information expected in the report, and the importance of on-time submission each quarter.

The Post-Award Conference serves an important purpose in helping to establish a cooperative working relationship between the grantee and grantor early on. By helping to ensure that all parties understand the terms and conditions of the grant, the DVET/GOTR and grantee (and sub-grantees) can help to make the remainder of the grant term as trouble-free as possible.

5.9 Summary

This chapter of the VETS Guide has provided detail about the VWIP grant application process and has provided suggestions for both new applicants to the program and existing grantees. This chapter has discussed key items for inclusion in the grant proposal, especially keeping in mind applicants new to the process. In addition, this chapter has discussed the DOL's application review process and has described the Post-Award conference. The following chapter provides information on discretionary and unsolicited VETS grants.





Chapter Six Discretionary Grants

This chapter provides an overview of discretionary, or unsolicited, grants made available through the Veterans' Employment and Training Service (VETS). Discretionary grants present an opportunity for eligible grantees to apply for Veterans' Workforce Investment Program (VWIP) funding outside of the normal competitive cycle, to obtain more assistance to expand their activities, and/or to propose innovative projects and approaches. This chapter defines eligible grant applicants, describes the grant cycle for discretionary funds, and discusses technical assistance available to applicants and grantees.

6.1 Overview of Discretionary Grants

The grant funds made available to the Assistant Secretary for Veterans' Employment and Training (ASVET) for the VWIP program are divided into two separate pools: competitive (solicited) funds and discretionary (unsolicited) funds. While regulations require that at least 80 percent of funds be allocated to states on a competitive basis, the balance is maintained in a discretionary account to be administered at the discretion of the ASVET. Historically, discretionary grants have been used to fund research and demonstration projects, to pay for evaluation studies, and to supplement grants funded under the competitive program.

Discretionary vs. Competitive Grant Applications

- Discretionary grant applications are not usually solicited through a separate SGA.
- Discretionary grant applications are first reviewed by DVET staff rather than by Procurement Service Center staff, as is the procedure with competitive grants.
- Field staff are encouraged to provide Technical Assistance (TA) or informational guidance in the development or refinement of an unsolicited proposal.


6.2 Eligible Applicants And Grant Cycle

Applications for funds will be accepted from state and local workforce investment boards, local public agencies, and nonprofit organizations – including faith-based and community organizations – that have familiarity with the area and population to be served and can administer an effective program. Although discretionary grants are not requested through a separate Solicitation for Grant Applications (SGA), in order to maintain program

integrity and ensure consistency in the measurement of performance, all discretionary grant requests must follow the submission format and program design criteria set forth in the most current competitive Solicitation for Grant Applications (SGA) for VWIP. Furthermore, applicants requesting discretionary funds must present a clear understanding of the program's unique features and innovation in meeting and serving the targeted veterans' employment and training needs. For these reasons, it is essential that discretionary grant applicants carefully review the relevant SGA.

Grant applicants should be aware that the SGA may include language regarding match funding requirements, for discretionary as well as competitive applicants.



A key role of VETS is to assist potential discretionary grantees in developing and refining applications and supporting materials. This technical assistance is explained further in [Section 6.3](#)  below.

For a discretionary grant, an eligible applicant submits an application for a grant to the Director of Veterans' Employment and Training (DVET) who reviews it and then makes a recommendation to the Regional Administrator of Veterans' Employment and Training (RAVET). The DVET makes a recommendation based on a number of factors. These factors include a review of the applicant's past program performance (whether for a previous VWIP or other grant, or comparable employment and training program), and a review against the criteria established in the SGA. Finally, the DVET evaluates the extent to which the proposed program is unique and innovative and will provide services to veterans above and beyond what is currently available and relieve barriers to employment.

The RAVET then reviews the application and forwards it to the VETS National Office with or without a recommendation to fund the grant. The Veterans' Employment and Training Service (VETS) National Office reviews the funding request and makes a recommendation to the Grant Officer to award or not to award a grant.

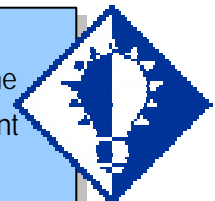
Letters of notification of award are sent to applicants, with copies to the DVET. Typically, grant award notices are sent 45-60 days after the submission date of grant applications. Such notifications constitute the formal, legal grant award and include both "General Provisions" and "Special Provisions" that govern the performance of the grant. Grant start-up should begin immediately, and discretionary grants may not exceed 18 months.

6.3 Technical Assistance To Applicants And Grantees

The information contained in the SGA will serve as a platform for VETS staff providing technical assistance regarding discretionary or unsolicited grant proposals. Therefore, both VETS staff and applicants are encouraged to read the SGA very carefully. With a comprehensive understanding of the grant review process, VETS staff can:

- Ensure that the appropriate eligible applicants receive copies of the most current competitive SGA and are aware of program criteria and the proper format for submission;
- Provide technical assistance (TA) to applicants by identifying veterans' needs and assisting in the development of programs to meet those needs;
- Assist grant applicants in the preparation of the proposal according to SGA requirements and provide appropriate grant application training;
- Provide technical assistance in completing the application, if necessary;
- Review grant applications/modification requests to document deficiencies and identify problem areas;
- Ensure application accuracy and compliance with the requirements of the SGA; and
- Certify past performance to make and document funding recommendations, including corrective suggestions.





As part of technical assistance during the development of non-competitive grant applications, the Grant Officer's Technical Representative (GOTR) should assist the grantee in developing realistic program goals. This early action will help to prevent grant management problems later on.



6.4 Program Monitoring

As with the competitive grant programs, DOL/VETS must ensure that discretionary funds are expended efficiently, effectively, and in compliance with all legislation and regulations. The ASVET is charged with reporting annually to Congress on the actual achievements of grantees compared with the goals stated in their grant applications; this reporting requirement applies to discretionary as well as competitive grants.

Once the discretionary grant funding is awarded, the DVET staff initiates responsibility for monitoring the on-going operations of grant projects. Monitoring involves comparing actual program accomplishments and expenditures to the goals, objectives, and funding

levels specified in the grant award (or modification.) As more fully described in [Chapter Seven](#),  monitoring is used to identify potential problems as early as possible, so that corrective action can be taken in a timely manner. [Section 7.2](#)  provides a detailed overview of the components of grantee monitoring, while [Section 7.3](#)  describes how grantees can prepare for monitoring visits. Other topics such as technical assistance, grant modifications, grantee sanctions, penalties, and rewards are also covered in [Chapter Seven](#) .

As with competitive grants, the GOTR is responsible for conducting the desk review and the on-site monitoring visit for discretionary grantees. The information obtained through these monitoring methods is used by both the GOTR and the grantee. The GOTR uses desk review information to prepare for the on-site monitoring visit and uses information from both sources to assist the grantee in meeting its program goals. The GOTR may provide technical assistance to the grantee based on information gathered through desk review and on-site monitoring. In turn, the grantee uses the information, particularly the GOTR's report of the on-site visit, to assess its program and correct or prevent problems.

Discretionary grants that have a national scope may have a Grant Specialist from the VETS National Office named as the Grant Officer's Technical Representative (GOTR). In most other cases, when a discretionary grant is awarded for a program that is to serve the veteran population of a state, the DVET will be designated the GOTR. The exact flow of monitoring information will depend upon whether the GOTR works for a VETS State Office (the case for all competitive grants and most discretionary grants) or is a Grants Specialist in the VETS National Office (the case only for some discretionary grants.)

When a VETS National Office Grant Specialist serves as the GOTR, the flow of grant monitoring information is more restricted. Instead of submitting reports to a RAVET, the Grant Specialist GOTR submits reports directly to the Director of the Office of Operations and Programs. As is the case in discretionary grants for which a DVET or ADVET is the GOTR, the data collected here is not aggregated. However, the monitoring information is used for other purposes by other VETS staff. Therefore, the GOTR must see to it that the monitoring information is passed on in a timely manner.

6.5 Summary

Discretionary grants are intended to fund innovative or unique projects that may not necessarily fit the requirements outlined in the competitive grant programs. In this way, the discretionary grants serve an important purpose for VETS in the testing of new ideas

and programs. While a number of discretionary grants processes are similar to the processes for competitive grants, discretionary grantees can have more direct involvement from the local DVET and national VETS staff. This involvement can take the form of technical assistance in the development of a proposal to be funded by discretionary funds, and also in the actual implementation of the grant.






Chapter Seven Reporting and Grant Monitoring

This chapter describes the monitoring process conducted by DOL/VETS for grantees. The chapter provides detail about grantee reporting requirements, as well as information on how this information is reviewed by VETS staff. On-site monitoring visits are also described. In addition, the chapter provides information on the procedures followed in situations where corrective action might be needed, or more serious cases where imposition of sanctions or penalties is necessary.

VETS wants to ensure the success of all grantees; thus monitoring grantees, and providing technical assistance where needed is highly important. This guidance is provided, in part, to ensure that all grantees can perform as well as possible and can avoid negative monitoring findings that might lead to corrective or more serious action.

7.1 Grantee Reporting Requirements

Throughout the grant period and following the end of the grant period, grantees are required to submit reports to the state-level VETS Director (DVET) on both the programmatic and financial status of the grant program. Grantees are instructed on the reporting requirements contained in the general provisions of the award at the Post-Award Conference. To be in compliance with the award provisions, grantees are required to submit the following reports:

- **Financial Reports** – The grantee must report outlays, program income, and other financial information to the DVET on a quarterly basis no later than 30 days after the ending date of each Federal fiscal quarter during the grant period (i.e., October 30, January 30, April 30 and July 30). The financial report is a standard form (SF-269A, Financial Status Report, Short Form) available on the Internet at <http://www.whitehouse.gov/omb/grants/sf269a.pdf> 
- **Technical Performance Reports** – The grantee must submit a Quarterly Technical Performance Report 30 days after the end of each Federal fiscal quarter to the DVET. This report must contain the following:

1. A comparison of actual accomplishments to established goals for the reporting period, and any findings related to monitoring efforts; and
2. An explanation for variances of plus or minus 15 percent of planned program and/or expenditure goals. The explanation must also include a corrective action plan and timetable.

As is clear from above, the Technical Performance Report is divided into two parts, and both are submitted on a quarterly basis. First, the grantee must complete a standard format which contains such information as the number of Federal dollars expended, the amount of non-federal funds spent, if applicable, and the number of veterans served. Second, each grantee is expected to file a written report on the grant program. The narrative should do more than simply put into textual format the data already shown on the standard form. It should explain, in some detail, what is happening in the program and why. If some aspects of the program are doing much better than expected, the grantee should explain why. If other aspects are not on target, the grantee should both offer an explanation and describe what is being done to improve performance in those areas. If the grantee foresees the need to change the program schedule or anticipates problems, this report should address this explicitly.

- **Request for Payment** – In addition to these performance status reports, the grantee is required to submit a request for payment in order to process grant payments, on a quarterly basis. (This form is HHS-PMS 272, and is explained at the Post-Award Conference.)
- **90 Days (Grant End) Report Package** – No later than 90 days after the grant expiration date, the grantee must submit a final report containing the following:
 1. Financial Status Report (SF-269A)
 2. Technical Performance Report
 3. Narrative Report. The narrative report should identify:
 - Major successes of the program;
 - Obstacles encountered and actions taken (if any) to overcome such obstacles;

- The total combined number of veterans placed in employment during the entire grant period;
 - The number of veterans still employed at the end of the grant period;
 - An explanation of why those veterans placed during the grant period, but not employed at the end of the grant period, are not employed;
 - Any recommendations to improve the program.
- **Six (6) Month Final Report** – No later than 210 days after the grant performance period ends, the grantee must submit a follow-up report containing the following:
 1. Final Financial Status Report (SF-269A)
 2. Final Narrative Report. The Final Narrative Report should follow a similar format as the 90-day report, and should include the following about participants at the six-month mark after the end of the grant period:
 - The total combined (directed and assisted) number of veterans placed in employment during the grant period;
 - The number of veterans still employed during follow up;
 - Are the veterans still employed at the same or similar job? If not, what are the reasons?
 - Was the training received applicable to the jobs currently held by veterans?
 - An explanation regarding why those employed at the end of the follow up period, are not employed; and
 - Any recommendations to improve the program.

Issues Affecting Performance Reporting

Two aspects of performance reporting have often created challenges (or difficulties) for both the grantee and VETS staff monitoring the grantee in the past. These two issues include properly projecting goals and the period covered by the first quarterly report.

Projected Goals: Frequently, projected goals are not accurately stated either in the grant application or the Grant Agreement. For example, the applicant may simply divide the annual program goals by four to obtain the quarterly goal figures required in the grant application and in the Grant Agreement (i.e., an applicant proposing to train 100

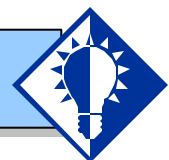
veterans and place 40 of them in employment over the 12-month period of the grant, might propose that in each quarter of the grant 25 veterans will be trained and 10 placed). Although this approach seems logical, it might present problems relative to achieving the target performance objectives according to the proposed schedule.

In the specific example outline above, it is likely that the applicant proposes to develop a program, publicize it, register veterans, train them, and assist in job placement. It is reasonable to assume that much of the first quarter of the grant will be spent in developing and publicizing the program. Most likely during the first quarter, few veterans will actually be enrolled and trained, and probably none will actually be placed. Placement is not likely to occur until much later in the program.

A more realistic plan would take this into account and indicate in the grant application incrementally increasing goals that will take place on a quarterly basis. For example, for the goals in this example outlined above, the applicant/grantee might propose to train 10 veterans in the first quarter and 45 in each of the second and third quarters. Placement goals might show 0 for the first and second quarters, 10 in the third, and 30 in the fourth.

Period Covered by the First Quarterly Report: A second issue concerns the period covered by the first quarterly report. The first quarterly report is due at the end of the first Program Quarter during which a program was active. This is true regardless of the length of time between the Program Start Date and the end of that quarter. For example, if a Program Start Date is November 15, a quarterly report is due for the quarter ending December 31 even though there will be only six weeks of program operation, not a full quarter, upon which to report.

The “program start date” is the date on which a grantee can legally begin to spend Federal grant funds.



7.2 Grant Monitoring

DOL/VETS emphasizes thorough monitoring of grantees. One of the key roles of the state level DVET in the administration of grants is the monitoring and provision of technical assistance to grantees. In most cases, the DVET is appointed as the Grant Officer's Technical Representative (GOTR). In this function, the DVET/GOTR is responsible for monitoring the grant, providing technical assistance as necessary, identifying any instances of non-compliance, and recommending corrective action.

On a basic level, monitoring ensures that grantees comply with the Grant Agreement and all laws, regulations, and policies concerning grants in general, and VETS grants in particular. Not only can monitoring assist in identifying potential challenges and allow for sufficient time in order to find solutions to those challenges, it can help reveal program successes as well. Monitoring should therefore be seen as a largely positive activity.

VETS uses two methods for obtaining information about grant performance - [desk reviews](#) and [on-site visits](#). A desk review is a review of reports submitted by the grantee, including the quarterly technical performance report, the financial status report and requests for payment. On-site monitoring visits are typically conducted in the third quarter of the grant period and involve an in-person visit to the grantee by the GOTR, observation of grantee activities and interviews with grantee staff. Whether completing a desk or an on-site review, VETS staff use three review processes in monitoring:

1. **Plan Versus Actual Monitoring (PVA):** This is a review and analysis of current program information to determine the extent to which grantees are achieving goals established in the Grant Agreement.
2. **Managerial Monitoring:** This review of the quality of the program and the effectiveness of services provided to veterans involves troubleshooting to determine the cause of identified problems. This review involves assessing the organizational capacity of the grantee in carrying out the proposed program. Managerial monitoring also includes determining corrective action, provision of technical assistance, and providing ongoing liaison with grantees to ensure that corrective action occurs. Managerial monitoring is a process that is performed throughout the program activity period.
3. **Data Validity Monitoring:** This review is a systematic monitoring method to substantiate the reliability of program and financial information reported by grantees.

The DVET uses all three of these methods in the monitoring of grantees. The following sections describe more fully both desk reviews and on-site visits.

7.2.1 Desk Reviews

As described above, each grant recipient is required to file a quarterly technical performance report. The quarterly technical performance report is also the primary instrument by which the GOTR monitors the progress of a grantee and is one basis for suggesting any necessary corrective action or modification.

The quarterly technical performance report is the primary source for statistical reports to both Congress and the public on the performance of VETS programs.

Review of the quarterly report is, in part, an exercise in comparing projected to actual performance (PVA). That is, the information provided on the quarterly report on monies actually spent and veterans actually served (and other program goals) are compared to the projected figures contained in the Grant Agreement (or modification, if there is one.) A review of this information can therefore:

- Identify potential or existing problem areas;
- Provide background information concerning program design, operational procedures and previous monitoring activities; and
- Identify the priorities/activities to be reviewed during the on-site visit.

Each program year quarter, the GOTR's desk review will include an assessment of the Quarterly Technical Performance Report including the grantee's expenditures. In addition, the GOTR reviews the Financial Status Report (SF-269) and compares it with the quarterly HHS 272. Any discrepancies (plus or minus a 15 percent variance) between those documents and between planned and actual expenditures are noted on the monitoring instrument as part of the desk review. Additionally, review of other pertinent narrative data, such as previous monitoring reports and Corrective Action Plans (and, if available, monitoring reports from state or other Federal sources), is also completed.

Quarterly Grant Summary Report

The quarterly grant review performed by the GOTR is not complete until the GOTR prepares the Quarterly Grant Summary, a written summary of the progress and problems (if any) of the grant program.

The GOTR, whether the DVET, ADVET, or a Grant Specialist in the VETS National Office, is responsible for preparing the Quarterly Grant Summary.

The Quarterly Grant Summary is typically no more than one or two pages unless the GOTR has concerns about grantee progress or performance. In that case, the Summary includes:

- A description of the problem or potential problem;
- A summary of any actions taken to rectify the issue (such as provision of technical assistance, discussions with the grantee, or a request for a Corrective Action Plan (CAP)⁸ along with the date(s) such action(s) was taken;
- An indication of whether or not a CAP will be required of the grantee;
- An assessment of whether or not a Grant Modification might be necessary; and
- Any additional information required to explain and/or document fully the situation.

The GOTR submits the Summary to the RAVET for review, who then forwards the Summary to the national VETS office where it is reviewed and becomes part of the grantee's file. A sample format for the GOTR Quarterly Summary Report is included in Appendix D of this Guide.

The quarterly review of grantee information is important, both to ensure that the grantee remains in compliance and to help identify potential problems early. Equally as important, this desk review is used to prepare for the on-site evaluation and should be conducted before an on-site visit is scheduled.

7.2.2 Monitoring Visits

Monitoring visits allow the GOTR to assess in person the operations of a grantee program. The purpose of the visit is to provide for a more in-depth review of the grantee and to help address issues or concerns that have surfaced as a result of the quarterly review of performance reports. The visit may be one of two types: 1) an on-site monitoring visit may be a regularly scheduled review/evaluation, or 2) a special visit triggered by the grantee, something discovered in the quarterly desk review, a complaint, or some other cause.

Two factors determine the length and the depth of the monitoring visit – the purpose for the visit and the size and complexity of the grant. Regular evaluation visits are completed in the third program quarter of the program year and are intended to review the operation of the entire grant program. A special monitoring visit is typically completed to investigate one particular aspect of a grant program, and may take less time than the regular evaluation visit.


⁸ CAPs are discussed further in Section 7.5 below.

The on-site monitoring process is comprised of five steps:

- Desk review and on-site review preparation;
- On-site review;
- Documentation of Findings (Report);
- Corrective Action (if necessary); and
- Follow-up.

The first step for the monitoring visit involves the GOTR's off-site review of previously submitted quarterly technical performance reports, as well as the original Grant Agreement, in order to develop the agenda and determine the length of time for the monitoring visit. The GOTR will consider the following questions about the grantee:

- Which grantee program components contain potential challenges?
- Who should be interviewed to identify and understand any concerns? (financial, programmatic, or administrative staff, clients/customers, staff from partner organizations, clients, etc.)
- What records should be examined and what information gathered?
- What activities should be observed?
- What needs to be documented, recorded and reported? Are the grantee's records complete?
- What questions need to be asked or data collected in order to provide appropriate technical assistance to this grantee?

On-site visits are expected to take one to two days and will typically begin with an "entrance interview" to explain the purpose of the visit, and will end with an "exit interview" to review any initial findings from the visit. The GOTR may provide the grantee with an agenda for the on-site visit ahead of time. A typical agenda, as well as checklists for review of financial and other grant program information, are included in [Appendix D](#). 

The GOTR will develop a written *monitoring instrument* to use to collect information about the grantee while on-site. (A sample monitoring instrument is included in [Appendix D](#).)

Typical components of the monitoring instrument include:

- Review of project financial and non-financial records;
- Review of the administrative and management structure and system;
- Review of the flow of participants through the program, if applicable;
- Documentation of visits to work sites and training institutions, if applicable, if time permits and if it is determined to be necessary;

- Review of other specific items and questions identified during the desk review; and
- Exit interview with the project director.

Using the monitoring instrument, the GOTR's collection of grantee information is usually accomplished through three methods. These include: review of participant records; staff and/or client interviews; and general observation.

Review of participant records is used to:

- Validate quantitative data previously submitted in quarterly reports;
- Validate eligibility of participants;
- Validate that activities proposed/planned are being carried out as planned;
- Ensure the grantee is complying with all record-keeping requirements;
- Identify and provide a focus for on-site interviews and observations; and
- Monitor grant program costs.


Staff and client interviews can provide useful information about a program that cannot be obtained in any other way. The purpose of interviewing is to:

- Verify and expand upon information obtained from the desk review and other on-site review activities;
- Obtain qualitative information on activities;
- Identify causes of problems, deficiencies or of exceptional performance; and
- Identify management or administration issues requiring more in-depth review.

Candidates for in-person interviews include:

- Program staff, including administrative program staff, such as program managers, trainers, counselors, job developers, etc.;
- Clients/customers of the program;
- Chief elected official of the geographic area in which the program is operating (for example, governor, mayor, or county executive);
- Community members affected by the program; and
- Leaders and members of appropriate interest groups, particularly local veterans' organizations, which may be linked to the project in the program narrative, or whose services may be claimed as a match.

Observation is also a technique for gathering information about the operation of a grantee’s program. Through observation, the GOTR may observe and formulate objective opinions about the adequacy of buildings, furnishings, equipment, signs, and other posted information during the on-site visit. Such impressions will be included as part of the written report and might also be shared during the exit interview with the grant manager.

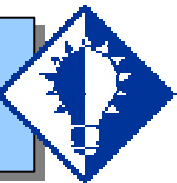
The GOTR prepares a written report on the results of the on-site monitoring visit. This report is discussed in more detail in [Section 7.4](#)  below.

7.3 How Grantees Should Prepare for Monitoring Visits

To help the grantee prepare for a monitoring visit, the GOTR communicates with the grantee both in writing and by telephone about the purpose of the upcoming visit, the types of information the GOTR will review, and the methods to be used during the visit. As described above, the monitoring activities might include review of written materials or client files, interviews with staff and clients, as well as observation of grantee operations. The GOTR may also provide to the grantee a copy of the monitoring instrument that will be used, or summarize its key points.


The grantee can use this information as one basis for preparing for the visit. With the information provided by the GOTR about the monitoring visit, the grantee can prepare staff and others who may be asked for an interview, and can ensure that program records are up to date and organized in such a way that will allow access by the GOTR.

If the GOTR provides the monitoring instrument, the grantee can perform its own “simulated” monitoring visit prior to the formal visit, in order to identify any deficiencies that should be corrected before the actual monitoring visit.




7.4 Monitoring Findings

The GOTR must prepare a written report on the results of the on-site monitoring visit. In most cases, the issues covered in the report will be those that had been identified during the desk review but remain unresolved, supplemented by any new issues that came to the attention of the GOTR as a result of the on-site record review, interviews, or observations.

In reporting on the grant, the GOTR may use any format that adequately summarizes the findings of the on-site visit. The monitoring instrument (included in [Appendix D](#))  will generally serve as the guide to the issues covered in the monitoring report.

The findings and recommendations, particularly those involving corrective action, must be objective, accurate and related to the goals and objectives of the particular grant. The monitoring instrument and written report must be submitted to the RAVET, who forwards them to the National VETS Office, where they become part of the official grant file.

The GOTR must also inform the grantee in writing of the findings and recommendations no later than ten days after the on-site visit. The findings may be summarized, or the GOTR may include the full report. Generally, there are four types of findings reports as a result of an on-site monitoring visit. These include:

- **Grantee is exceeding goals.** In this case, the grantee is currently exceeding the goals outlined in the Grant Agreement.
- **Grantee has no problems or potential problems:** In this case, the GOTR has determined that the grantee is currently operating according to plan, with no current or potential problems.
- **Grantee has some potential challenges:** In this case, the GOTR has determined no current concerns, but has identified areas where challenges may arise in the future. The GOTR identifies these challenges, and makes a recommended course of action to address these concerns. Typically, a follow-up telephone conference between the grantee and GOTR takes place to discuss the recommendations and the time frame for addressing them.
- **Grantee requires a Corrective Action Plan (CAP):** In this case, the GOTR determined that there are concerns significant enough to warrant a Corrective Action Plan. Typically, a follow-up telephone conference between the grantee and GOTR takes place so that the GOTR may outline these concerns, indicate that the grantee is not in compliance with the Grant Agreement, and offer to provide technical assistance to work with the grantee to bring the grant back into compliance. The GOTR also indicates that a CAP is required and establishes a time frame by which the CAP is to be submitted to the GOTR. (The CAP is discussed further below in [Section 7.5](#)) 

7.5 Technical Assistance and Corrective Actions

DOL/VETS wants to do everything feasible to ensure the success of all grantees in carrying out their proposed programs. In order to maximize the success of grantees, VETS offers technical assistance (TA), when appropriate, as part of the follow-up to the grant monitoring process. In many cases, only minor problems are found as a result of the monitoring process. In general, these minor problems are relatively easy to address. In some cases, however, potential challenges, or current problems significant enough to warrant a Corrective Action Plan (CAP) are identified. These situations are discussed below.

Minor Problems: For example, the GOTR might note a minor issue such as inadequate signage at the program site, and may suggest that additional signs be posted. Or, the GOTR may point out that many enrollment applications do not have the date entered. In order to correct these minor problems, the grantee would post new signs or ensure that all program personnel are informed that the enrollment applications must be dated.

If **minor problems** are found, a CAP is not required. However, even minor problems can be identified and must be addressed. A schedule for correcting the problem(s) will be and the GOTR will provide any TA necessary to implement solutions to the problem(s). The GOTR will contact the grantee at a mutually agreed upon time to ensure that corrective action has been taken. In subsequent quarterly desk reviews, the GOTR will look for evidence that these minor problems have been corrected and are not adversely affecting grant performance. If necessary, the GOTR may schedule another on-site visit to validate that corrective action as been taken.

If **potential challenges** are found as a result of the monitoring process, the GOTR will work with the grantee to ensure that these challenges do not become real. This might be as simple as pointing out the potential problems to the grantee, or it might involve providing specific technical assistance. In either case, the GOTR contacts the grantee at a later, mutually agreed upon date, to determine if appropriate action has been taken. During subsequent quarterly desk reviews, the GOTR looks for evidence that potential problems have not developed into real problems.

If **significant problems** are found either in the desk review or as a result of the on-site visit, a CAP is required. A difference of more than 15 percent from program goals or expenditures would necessitate a CAP. Other significant problems might include deviation from other planned program activities such severe under-enrollment or lack of specific planned efforts, such as a job fair. Development of the CAP is the grantee's responsibility, with assistance and direction provided by the GOTR.

A CAP is required if the GOTR finds the grantee is not in compliance with the Grant Agreement. Specifically, if any actual data is 15 percent below projected goals, or the approved budget, the grantee must develop a CAP. The CAP should contain three basic elements:

- A description of the problem(s) being addressed;
- A detailed, step-by-step plan to correct the problem(s); and
- A schedule for implementing the plan.

On the basis of the schedule contained in the CAP, the GOTR contacts the grantee to ensure that the proposed actions have been taken. The GOTR also determines whether or not the grantee believes the actions taken are effective. Grantee quarterly summary reports submitted after a CAP has been filed must indicate the grantee's performance in fulfilling the CAP. The GOTR must consult both the original Grant Agreement and the CAP when performing desk reviews to ensure that the grantee is in compliance with both. If necessary, the GOTR should schedule a follow-up on-site visit.

It is the responsibility of the grantee to develop the CAP. However, the GOTR should provide technical assistance as necessary to help the grantee prepare the CAP. If the GOTR is not able to provide needed TA (for example, if the grantee requires assistance in accounting or some other specialized skill), the GOTR will notify the RAVET. The RAVET is then responsible for identifying an individual, not necessarily a member of the VETS staff, to provide the needed assistance.





Program Success: CAPs are discussed here as plans for correcting problems. However, a grantee may deviate more than 15 percent from projected goals, or spend less money than the approved budget for other than negative reasons. The GOTR may therefore deem that a CAP is not necessary. For example, a grantee might train and/or place 15 percent *more* targeted veterans than proposed. Alternatively, the grantee might be meeting training and placement goals at a cost significantly lower than anticipated. Monitoring in these cases can help showcase promising practices and grantee "high performers." In some cases when a grantee is significantly exceeding goals, a Grant Modification may be necessary (discussed further below.)

If the GOTR has determined that these figures do not constitute a problem (e.g., a possible problem might be that the projected goals and expenditures were unrealistic to begin with), the grantee should explain in writing why its performance was better than expected. This document is carefully reviewed, first by the GOTR, then by the RAVET and

VETS National Office staff, to determine if other grantees can benefit from this information.

In some cases, an on-site monitoring visit or a desk review will uncover problems severe enough that a CAP is an inadequate response. In most of those situations, a Grant Modification will be necessary. In some, there may be sufficient cause to begin the process of determining whether or not criminal or other sanctions need to be imposed.

The Grant Modification process is discussed further in [Section 7.6](#) , and [Section 7.7](#)  reviews sanctions, penalties and rewards.

7.6 Grant Modifications

Although a Corrective Action Plan is used to help bring a grantee into compliance with the Grant Agreement, Grant Modifications are used when the grantee cannot comply with the Grant Agreement, and a change to the SF-424 or SF-424A (Budget Information) is required.

There are a number of reasons – positive, negative and neutral – for disparity between actual accomplishments and the goals originally projected by a grantee. For example, a grantee may have projected costs in the budget proposal for an activity that later was provided for at no cost to the grantee. In situations of this type, the grantee will not have expended certain grant monies for the purposes originally intended.

The most common reasons for requiring a Grant Modification are neutral ones – those that do not reflect on the actual performance of the grantee but are reflections of the environment in which grantees operate. For example, if a grantee's training program lost two weeks of operation due to severe weather or a fire at its facility, thus delaying the beginning of other portions of the program, it may be necessary to request a modification to extend the grant period in order to make up for the lost time.

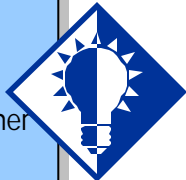
Other reasons for needing a modification are more negative. For example, a grantee may have proposed to place 45 veterans in unsubsidized positions after training, but at some point during the grant period realizes that, at best, it will only be able to place 35 trainees. Conversely, on the positive side, a grantee may have proposed to place 45 veterans, but at the halfway point in the grant period has placed 65 and looks as if it will be able to place at least at least 30 additional veterans. Overachievement of program goals may be a result of proposing unrealistic goals to begin with and a Grant Modification would thus be in order.

Essentially, any change to a grant that deviates from the approved SF-424 or SF-424A requires a Grant Modification. These include:

- Changes in the grant start date;
- Changes in the grant end date;
- Any increase in expenditure;
- Any expenditure decrease of more than 5 percent;
- Any increase or decrease of more than 15 percent in performance goals; and
- Any decrease in matching funds or in-kind contributions.

Changes in the scope of the approved grant generally will not be approved if it appears that the request is being made merely to adjust for poor performance.

Decreases in the match will not be approved if the grantee does not indicate any other action had been taken to identify alternative sources of match.



7.6.1 Process for Modifying a VETS Grant

Because requests for Grant Modification are requests to change the conditions of the Grant Agreement, they are submitted on the same forms used to make the original grant application: the SF- 424 and, if necessary, SF-424A (Budget Information). A letter requesting the modification(s) and information explaining and justifying the change(s) being requested must accompany the forms.

The GOTR has a key role in assisting the grantee in pursuing a Grant Modification, and is responsible for providing whatever TA is necessary to the grantee in completing the modification request. This TA includes assisting the grantee in providing sufficient justification (if such exists) for any modifications to the Grant Agreement. In addition, the GOTR is responsible for reviewing all modification requests and for making a recommendation to the Grant Officer via the Office of the Assistant Secretary for Veterans' Employment and Training (OASVET.)

The GOTR can approve some changes without requesting a Grant Modification. Specifically, the GOTR can approve changes in “technical matters not involving a change in the scope, costs or conditions of the effort.”

If a modification request asks for more than one change, each is considered separately. A modification action may approve one part of the grantee’s request and disapprove another. The GOTR reviews the modification request including reviewing for accuracy

and completeness, and makes a recommendation in writing. From this point forward, requests for Grant Modification are handled in the same manner as Grant Applications.

The request for modification is forwarded to the Grant Officer by the DVET to the RAVET, who submits it to the VETS National Office. After review within the VETS National Office, the request is then forwarded to Grant Officer.

When Requesting a Grant Modification....

Although the application and modification processes are similar, there are considerations that apply only to the modification requests. Here are some steps to follow to ensure that common pitfalls are avoided:

1. Ensure that the modification request is accompanied by the required forms – the SF-424 and SF-424A. Note that a letter requesting a modification without the appropriate backup forms is not acceptable.
2. Ensure that forms are completed correctly. When a request for an extension is submitted, Section D of the Budget Information Form needs to be revised if the activity will extend into an additional quarter. Note that Program Quarters are: January-March; April-June; July-September; and October-December. The first quarter of the grant is the quarter in which the period of performance begins. The Project dates and duration of project items in the SF-424 also must be revised.
3. Explain requested modifications in the same level of detail as in the initial application. All requests for modification must contain information to justify the request.
4. Ensure that there is consistency between the changes indicated on the SF-424 and SF-424A. Any changes indicated on those forms must be discussed in the supporting documentation. Conversely, any changes discussed in supporting documentation must be indicated on the standard forms.

7.7 Sanctions, Penalties and Rewards

As noted, one of the goals of grant monitoring is to help ensure that grantees both achieve success with their grant programs and comply with the General and Special Provisions of their Grant Agreements. Technical assistance, a good working relationship with the GOTR, and ongoing monitoring are also elements that can help a grantee to achieve success over the course of the grant period.

There will be cases, however, in which grantees are unable to meet the provisions of the Grant Agreement for varying reasons. In such situations, the GOTR may find it necessary to recommend sanctions. Sanctions are actions that may be taken when a grantee is not

performing in compliance with the terms and conditions of the grant, and when a CAP has not resulted in program compliance. The Special Provisions of the Grant Agreement specify three sanctions that may be taken when a grantee is not performing in compliance with the terms and conditions of the grant:

- Withholding of Funds;
- Suspension; and
- Termination.

Each is described below.

7.7.1 Withholding of Funds

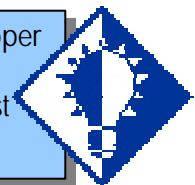
If a grantee has expended funds in a manner which is not permissible, or if the grantee's financial report (SF-269) does not justify the expenses requested on the SF-270 (or the amount of money drawn down by Letter-of-Credit), the Grant Officer has the authority to withhold payment by instructing the Department of the Treasury not to honor requests for payment from the grantee.

Withholding of funds continues until the Grant Officer is satisfied that any previous problems have been corrected and that the grantee has instituted procedures to prevent a recurrence of the problem.

7.7.2 Suspension of a Grant Program

Suspension of a grant temporarily suspends Federal assistance under the grant pending corrective action by the grantee or pending a decision to terminate the grant. Although in cases where funds are merely being withheld, the grantee may continue to operate a program (the grantee may use non-Federal funds or even Federal funds it had on hand before the withholding of funds was imposed), it may not, legally, continue to operate a program once a suspension has been imposed. Once corrective action is taken, a grant may be reinstated.

When a grant is reinstated, the Grant Officer (GO) will allow all necessary and proper costs that the grantee could not reasonably avoid during the period of suspension, provided that they meet the provisions of the grant and any applicable Federal Cost Principles.



7.7.3 Grant Termination

The termination of a grant means the cancellation of assistance under the grant, in whole or in part, at any time prior to the end of the grant period. If a grant is suspended, it may be reinstated once corrective action has been taken. The grantee is then permitted to continue its program. If a grant is terminated, no reinstatement option is available.

If a grant is terminated, the Grant Officer will promptly notify the grantee and the GOTR, RAVET, and OASVET in writing. The notification provides the reasons for and the effective date of the termination. Payments made to the grantee or recoveries of prior advances by VETS under grants terminated for cause shall be made in accordance with the legal rights and liabilities of the parties.

In addition to termination for cause, a grant may also be terminated for convenience. In such a case, the grantee or OASVET may terminate a grant, in whole or in part, when both parties agree that the continuation of the program would not produce beneficial results commensurate with the further expenditure of funds. Both the grantee and OASVET should agree on the termination conditions, including the effective date. A grant may also be terminated “in part” – a partial termination – when some portion(s) of a program is terminated, but others continue. In a partial termination, the grantee will not incur any new obligations for the terminated portion(s) after the termination effective date and shall cancel as many outstanding obligations as possible. Any non-cancellable obligations, properly incurred prior to the effective date, will be honored according to the terms of the Grant Agreement.

7.7.4 Imposition of Sanctions

Sanctions imposed on a grantee will depend upon the seriousness of the situation, the terms of the Grant Agreement, and the willingness and ability of the grantee to rectify the situation. Only the Grant Officer has the authority to impose sanctions on VETS grantees.

The GOTR, however, has the responsibility to recommend the imposition of sanctions when there is good cause and adequate documentation. Situations in which the GOTR might forward a sanction recommendation to the RAVET include, but are not necessarily limited to, the following:

- The grantee fails to submit timely and/or accurate quarterly reports and GOTR letters requesting corrective action are ignored;
- There is more than a 50 percent under expenditure of funds approved in

- Section D of SF-424A after the second Program Quarter; or
- The grantee has not achieved at least 50 percent of the approved grant application goals after the second Program Quarter.


The RAVET reviews the recommendation and forwards it to OASVET for further review. OASVET conducts appropriate discussions with the Grant Officer before any decision is made on the GOTR's recommendation. In the sanctioning process, the GOTR is limited to making the initial recommendation and to providing the documentation necessary to support that recommendation. The imposition of sanctions is a legal process and, therefore, complete and accurate documentation is essential.

7.7.5 Rewards

VETS wants to ensure and encourages the success of all grantees. Monitoring, on-site visits, the availability of technical assistance and the Post-Award Conference are all tools to ensure grantee success. VETS attempts to reward grantees that demonstrate significant success. In cases where grantee monitoring reveals operation of an exemplary program, VETS may document "best practices" by highlighting such programs. These grantees may be eligible for optional year funding, and may have access to the discretionary pool of funding as well.


7.8 Grant Close Out

At the end of the grant program year, all VETS grants must be formally closed-out by the grantee, the GOTR and the Grant Officer (GO). The Office of Cost Determination (OCD) is currently responsible for the distribution of close out packages to grantees and the administrative tasks of closing the grant. "Close out" means the official end of the grant period, the expenditure of all grant monies, and the accomplishment of grant project goals, and procedures for close out are outlined in the General Provisions of the Grant Agreement.

Grant close out typically occurs within 6 to 12 months after the grant expires. The General Provisions of the Grant Agreement specify the exact timing of the grant close out. The 6-month timeframe allows grantees time to conduct the required 6-month follow-up to document employment retention rates, and to develop the final report. (See [Section 7.1](#) above.)  In order to formally conclude the VETS grant, the grantee must submit the final technical and financial report to the GOTR, who ensures that the report is on time and accurate, and signs a form certifying this. The GOTR then submits the report to the Grant Officer. Un-obligated Federal funds remaining at the end of the grant period may not be used for other purposes,

and must be refunded to the U.S. Treasury. These un-obligated funds cannot be retained by the grantee for use on other grants. The Grant Officer makes a settlement for any upward or downward adjustments to the Federal share of costs within one year after the final financial and performance reports are received.

Records pertaining to the administration and operation of a VETS-funded grant program must be maintained by the grantee for a minimum of three years. This includes program files, participant information, financial records, and other data related to the implementation of the grant-funded program. Specific guidance regarding the retention of program and participant records is typically outlined in the Special Grant Provisions provided at the time of award.

Special Rules Regarding Property and Equipment: Federal regulations require grantees to maintain a system for tracking property and other equipment purchased with grant funds and have procedures for ensuring such assets are secure and used only for authorized purposes. Under the Federal regulations, "equipment" means tangible non-expendable personal property charged to the grant award and having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. Equipment might include (but is not limited to) computers and other office equipment, transportation vehicles, property maintenance equipment, medical or social service delivery equipment, or other equipment directly related to the function of the grant. The Code of Federal Regulations at 29 CFR 92.5 and 95 (http://www.access.gpo.gov/nara/cfr/waisidx_01/29cfrv1_01.html)  sets forth standards governing the management and disposition of property or equipment whose cost was charged to a project supported by a DOL Federal award. VETS grantees are encouraged to review these standards and ensure compliance throughout the grant period, as well as at the time of grant close out.

7.9 Summary

This chapter has provided an overview on grantee reporting and the monitoring process of VETS grantees. The importance of monitoring in assisting grantees to achieve success cannot be overemphasized. It is important for grantees to establish a good working relationship with the GOTR in order to facilitate monitoring and the provision of technical assistance where needed. This relationship and provision of technical assistance can be key in helping to avoid the implementation of a Corrective Action Plan, or the imposition of sanctions or penalties. Finally, the chapter provided information on the process of closing a VETS grant.



Appendix A

Guidance on Completing SF-424

A completed SF-424 must accompany the VETS grant application. Although this form is fairly straightforward, errors are common but can be easily avoided. Applicants are encouraged to review the following step-by-step instructions as they complete the form.

Box 1. Type of Submission:
The item "Non-construction" in the Application section should be checked.

Box 2. Date Submitted and Applicant Identifier:
Date: The year, month, and day the application is submitted to VETS.
Number: This is a control number that the applicant can assign for tracking purposes. It is not required by VETS.

Box 3. Date Received by State and State Application Identifier:
This section should be left blank.

Box 4. Date Received by Federal Agency:
This is the date received by the National Office in the case of competitive grants. The federal identifier number is left blank for a new grant.

Box 5. Applicant Information:

- a. Legal Name: For a competitive grant, the eligible applicant will be identified in the SGA. The Applicant Name entered here is that of the grantee, the entity legally responsible for program performance if an award is made.
- b. Organizational Unit: This is the name of the administrative unit of the Legal Applicant /Recipient that will have day-to-day responsibility for the grant program. For example, if the Applicant Name is the State Department of Human Resources, the organizational unit might be the Office of Employment Security. If the Applicant is the Office of the Governor, the organizational unit might be the Governor's Commission on Veterans' Affairs.
- c. Address: Self-explanatory.
- d. Contact Person: The name and telephone number of the individual to whom all inquiries concerning the application should be made. This should be an individual who is able to answer specific questions about the proposal.

Box 6. Employer Identification Number (EIN):

This is a number that employers are assigned by the Internal Revenue Service.

Box 7. Type of Applicant:

The letter representing the appropriate jurisdiction or organization should be entered in this box.

Box 8. Type of Application:

Check the appropriate box and enter the appropriate letter.

New: If the application is for a new program, one that has not been funded previously, and is a basic grant, check “new”.

Revision: Another name for a revision is a modification. Check “revision” if the Grantee is requesting a change in an on-going grant program that changes the Federal Government's financial obligation or contingent liability from an existing obligation.

Continuation: This means an extension for an additional funding/budget period for a project with a projected completion date.

Increase Award: If the applicant is requesting additional federal funding, enter “A”.

Decrease Award: If the applicant will not be able to obligate the original grant amount, enter “B”.

Increase Duration: If the applicant wishes to extend the duration of the project, enter “C”.

Decrease Duration: If the applicant must decrease the duration of the project, enter “D”.

Other: If there are other reasons for requesting a Revision or an Augmentation, enter “F” and specify the reason(s). Among the reasons for selecting “F” are:

- Grantee lost matching funds and needs an exemption from the required match provisions;
- Grantee requests that federal funds originally provided for one purpose (for example, to pay salaries) be used for another purpose (to purchase equipment); or
- Changes in the grantee or sub-grantee need to be made.

Box 9. Name of Federal Agency:

This should read “VETS, DOL”

Box 10. Catalog of Federal Domestic Assistance Number (CFDA):

- a. Number: Use the Catalog of Federal Domestic Assistance (CFDA) number assigned to the program under which assistance is requested. For HVRP, the number is **17.805**. For VWIP, the number is **17.802**.
- b. Title: This is the program title from CFDA, abbreviate if necessary. For HVRP, the title is "Homeless Veterans Reintegration Project" or "HVRP." For VWIP, the title is "Veterans Workforce Investment Program" or "VWIP."

Box 11. Title of Applicant's Project:

This section contains the formal title of the program for which the applicant seeks funding. It should be as descriptive as possible (e.g., Veterans Employment and Training Program).

Box 12. Areas Affected by Project:

The unit (state, county, city) affected should be entered here.

Box 13. Proposed Project Start Date and Ending Date:

The Project Start Date may not be earlier than the beginning of the Program Year for which funds are requested. In other words, a program start date may not be earlier than July 1. The Project Start Date may also not be earlier than the date on which the grant is signed. Note that the date format is the same as used elsewhere on the SF-424: Year, Month, and Day.

Box 14. Congressional Districts:

List the applicant's Congressional District and any Districts affected by the program or project.

Box 15. Proposed Funding:

These are the amounts of grant funds requested and the amounts of matching funds and in-kind contributions.

- a. Federal: How much is being requested in Federal funds?
- b. Applicant: How much is the applicant providing?
- c. State: How much in state match will the applicant obtain?
- d. Local: How much in local match will the applicant obtain?
- e. Other: How much match will the applicant obtain from other sources?

- f. Program Income: How much will the program generate?
 - g. Total: What is the total funding required for the program?
- Although Box 15 appears to be straightforward, the applicant should keep in mind a number of considerations:
- Although match funding is not required, it is encouraged. If the applicant provides match funds or in-kind contributions, the source of the match funds should be identified. Match funds may be from any combination of sources – applicant, state, local, or other.
 - The match may be provided "in-kind"; that is, the value of goods or services provided may be included as part of the match. For example, if a state provides office space for the applicant, the rental value of that space may be counted toward the match requirement.
 - Accuracy of the figures provided is important. The amount of funds indicated in 15a through 15f on the SF-424 should be the same as those on the Budget Information Forms, which in turn should be justified in the grant proposal document. The total indicated in 15g should be the sum of 15a through 15f.
 - The total funds should be realistic. Note that the reviewer, on the basis of previous VETS grant experience and the program description provided by the applicant in the grant proposal, will determine whether the funding requested is reasonable and appropriate for the program.

Box 16. Review by the State Executive Order 12372 Process:

Applicants should contact the State Single Point of Contact (SPOC) for Federal Executive Order 12372 to determine whether the application is subject to the state intergovernmental review process.

Yes: A date entered at 16a indicates that the document has been “duly authorized by the governing body of the applicant and the applicant will comply with the attached assurances if the assistance is provided.” Normally, the “yes” box should be checked as this process applies to VETS grant applications.

No: This indicates that the application is not subject to E.O. 12372 (state review and comment).

Box 17. Is the Applicant Delinquent on any Federal Debts?

This question refers to the organization applying for the grant, not the official who signs as the authorized representative of the organization. Categories of debt include, for example, delinquent audit disallowance, loans and taxes.

Box 18. Signature Block of the Authorized Representative:

The person signing the request for modification must be an authorized representative of the legal applicant who has the authority to bind the applicant organization to a contractual agreement with the Department of Labor. This signature block must be dated, and the representative's correct title and telephone number included. The signature block must be signed in blue ink.

Appendix B

Guidance on Completing Budget Information Sheet (SF-424A)

A completed SF-424A must accompany the VETS grant application. Because this form presents the applicant’s entire proposed budget for the grant-funded activities, it is a key document in the grant application package. Therefore, it is important to complete the SF-424A in its entirety and accurately. Applicants are encouraged to review the following step-by-step instructions as they complete the form.

Section A: Budget Summary

Lines 1-4, Columns (a) and (b):

Column (a) is used for entering the Grant Program Function or Activity, and Column (b) calls for the Federal Catalog Number of that activity. The Federal Catalog referred to is the Catalog of Federal Domestic Assistance (CFDA). The information that appears on Lines 1-4, Columns (a) and (b), will depend on two factors: whether the applicant is requesting Federal funds from one or more than one grant program; and whether the applicant is required to break down the budget by function or activity. The following table summarizes how the applicant is to complete this portion of the form.

	BREAKDOWN BY ACTIVITY REQUIRED	BREAKDOWN BY ACTIVITY NOT REQUIRED
FUNDS FROM ONE GRANT PROGRAM	Enter the name of each activity on Line 1-4 of Column (a), and the respective CFDA numbers in Column (b).	On Line 1, column (a), enter the CFDA program title and in Column (b), enter the CFDA number.
FUNDS FROM MORE THAN ONE GRANT PROGRAM	If one or more programs require a breakdown, prepare a separate sheet for each program.	If no programs require a breakdown, use the Line 1-4 of Column (a) to enter the CFDA title and Lines 1-4 of Column (b) to enter the respective CFDA numbers.

Lines 1-4, Columns (c) through (g):

Columns (c) and (d) are used to indicate the Estimated Un-obligated Funds from previous grant - Federal in Column (c) and Non-Federal in Column (d.) Therefore, for a new application, these two Columns are left blank.

For every line entry in columns (a) and (b), the applicant is to appropriate the amount of funds budgeted for each activity in Columns (e), (f), and (g.) In Column (e), enter the amount of Federal funds applied for. In Column (f), enter the amount of match/in-kind funds applied for. The total appears in Column (g).

In brief, Column (e) is the amount of VETS grant funds applied for, and Column (f) is the amount of matching funds or value of in-kind contributions to be provided. Column (g) is the total of VETS grant funds and match.

Lines 5, Columns (c) through (g):

Enter totals in this row.

Section B: Budget Categories

Lines 6a-6h, Columns (1)-(5):

Section B is a matrix in which the applicant is to enter the amounts of VETS Grant funds and match/in-kind funds required for each "Object Class" Category. Lines 6a-6h indicate the Object Class Categories. These include:

- 6a. Personnel
- 6b. Fringe Benefits
- 6c. Travel
- 6d. Equipment
- 6e. Supplies
- 6f. Contractual
- 6g. Construction
- 6h. Other

In Section B, columns 1-4 correspond to the same programs, functions and activities shown on lines 1-4 column (a), Section A. For each program, function or activity, the total requirements for funds (both Federal and non-Federal) must be filled in by object class categories. Totals for each category are listed in column 5.

Line 6i:

Show the totals of Direct Charges for Lines 6a through 6h on this Line, for all Columns.

Line 6j:
If indirect costs are claimed as part of the proposed budget, they are provided on this line.
If the applicant is claiming indirect costs, a copy of the negotiated, approved and signed approval document must be submitted with the application.
If no Government audit agency computed and authorized the rate being claimed, the applicant must provide a brief explanation of the computation, indicate who made the computation and the date the computation was made.
If the indirect rate is traceable through a SESA Cost Accounting System, the applicant must clearly state this in its application.

Line 6k:
Enter the total amounts of Lines 6i and 6j in all Columns of this line.

Line 7:
Enter program income for each grant program, function or activity.

Section C: Non-Federal Resources

Section C presents a breakdown of the amounts of proposed matching funds and/or in-kind contributions (from all sources, Federal and non-Federal) to be provided to the project. The source must be clearly identified. If in-kind contributions are included, a brief description must be submitted as part of the application narrative.

Lines 8-11, Column (a):
On Lines 8-11, Column (a), the applicant enters the program titles. These should be identical to the ones entered in Section A, Column (a), Lines 1-4.
NOTE: A breakdown by function or activity is not required here even if required in Section A.

Lines 8-11, Column (b):
The value of cash and in-kind contributions to be provided by the applicant are entered in this column. If the applicant is showing in-kind match, the contribution is entered here.
Lines 8-11, Columns (c) and (d):
Column (c) is used to enter the value of cash and in-kind contributions provided by the state, if the applicant is not a state or a state agency, Column (d) is used to record the value of such contributions from other (non-Federal) sources.

Lines 8-11, Column (e):

Column (e) is the total of Columns (b), (c), and (d.)

Line 12, Columns (b) through (e):

Line 12 shows the totals of Columns (b), (c), (d), and (e).

Section D: Forecasted Cash Needs

In this Section, the applicant shows projected expenditures by quarter. It is a non-cumulative breakout for both Federal and the match/in-kind funds.

Line 13:

The applicant shows the projected expenditures of VETS grant funds by quarter on this line. Total Federal funds for the Program Year are indicated in the first Column, and the projected quarterly expenditures are indicated in the four Columns labeled "1st Quarter," "2nd Quarter," "3rd Quarter," and "4th Quarter."

Line 14:


Line 14 is completed in the same manner as Line 13, except that the projected expenditures of non-Federal funds is entered.

Line 15:

The amounts in the Columns of Line 15 are the totals of the Columns of Lines 13 and 14.

The applicant should carefully and realistically consider the budget needs of the proposed grant-funded program for each quarter; quarterly expenses are not typically evenly divided. Only in rare instances will expenditures be relatively equal each quarter.

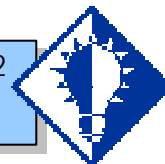


If the applicant has not realistically projected quarterly expenditures, there are two likely outcomes. Either the application will be returned to the applicant for revision, or, if an award is made accepting the quarterly figures submitted, the grantee may be in non-compliance at the end of one or more quarters. That is, the Quarterly Budget Summaries will show the applicant to be 15 percent or more over or under the projected budget. This will require that a Corrective Action Plan be submitted. (See [Chapter Seven](#)  of this Guide for further discussion.)

Section E: Budget Estimates of Federal Funds Needed for Balance of the Project

Section E is completed only for programs that are anticipated to operate for more than one calendar year and for which there is an understanding between the grantee and the funding agency that, if first year performance is satisfactory and if Congress appropriates sufficient funds, the funding agency will continue to provide support for the program.

Projects funded with HVRP and VWIP grants are designed to operate for a period of 12 months. Discretionary grants may have a longer grant period.



If the applicant is requested to project expenditures beyond 12 months, the following is provided to assist in providing the information.

Lines 16-19, Column (a):
The applicant should enter in Column (a) the same grant program titles that were entered on Lines 1-4, Column (a) of Section A. A breakdown by function or activity is not necessary.

Lines 16-19, Columns (b), (c), (d), and (e):
For each grant program listed in Column (a), the applicant should enter the amount of HVRP grant funds that would be required to continue the program for additional years. Column (b) shows the amount required for the first additional year, and Columns (c) through (e) show the amounts for the second through the fourth additional year.

Line 20, Columns (b), (c), (d), and (e):
The amounts entered in Columns (b) through (e) on Line 2d are the totals for Lines 16-19, Columns (b) through (e).

Section F: Other Budget Information

Line 21:
This line is used to explain amounts for individual direct Object Cost Categories that may appear to be out of the ordinary or to provide explanations requested by VETS.

Line 22:




If an indirect rate is charged, the applicant should indicate the type of indirect rate that will be in effect during the funding period, the estimated amount of the base to which the rate is applied, and the total indirect expense. Documentation should be provided.

Line 23:

Any other explanations required by VETS or deemed necessary by the applicant are entered here. Any additional sheets attached to the SF-424A, must be clearly marked with the applicant's name, project title, and SF-424A for which they are extensions.

Appendix C

Allowable and Unallowable Costs

Below are types of state and local government costs considered are **allowable** under VETS grant programs without specific prior approval. See [OMB Circular A-87](#)  for a more comprehensive listing. Non-profit organizations should consult [OMB Circular A-122](#)  and Educational Institutions and Hospitals should consult [OMB Circular A-21](#) .

1. Accounting – the cost of establishing and maintaining accounting and other required information systems.
2. Advertising – for recruitment of staff needed for the grant program; solicitation of bids for required goods and services; other purposes provided for in the grant.
3. Advisory councils – costs incurred by councils established pursuant to Federal requirements to carry out grant programs.
4. Audit service – necessary for the administration and management of the grant.
5. Bonding – bonds covering employees who handle grantee agency funds.
6. Budgeting – costs incurred for the development, preparation, presentation and execution of budgets. Note that costs for services of a central budget office, however, are generally not allowable, since these are costs of general government.
7. Building lease management – the administrative cost for lease management.
8. Central stores – the cost of maintaining and operating a central store organization for supplies, etc., used either directly or indirectly for grant programs.
9. Communications – for telephone calls or service, Teletype service, WATS, centrex, telpak, postage, messenger service and similar expenses.
10. Compensation for personal services – for services rendered during the period of performance. The costs of such compensation are allowable to the extent that total compensation for individual employees: a) is reasonable for the service rendered; b) follows an appointment made in accordance with state, local government laws and rules; and c) based on payrolls documented and provided in accordance with generally accepted practice of the state or local government.

11. Depreciation and use allowances – the use of buildings, capital improvements and equipment through use of allowances or depreciation.
12. Disbursing service – the cost of disbursing grant program funds by the Treasurer or other designated officer is allowable.
13. Employee fringe benefits.
14. Employee morale, health and welfare costs – the costs of health or first-aid clinics, recreational facilities, employees' counseling services, employee information publications and any related expenses incurred in accordance with general state or local government are allowable. Income generated from any of these activities will be offset against expenses.
15. Exhibits – exhibits relating specifically to the grant programs are allowable.
16. Legal expenses – cost of legal expenses required in the administration of grant programs is allowable. The cost of legal expenses furnished by the chief legal officer or staff, as part of their general responsibility are unallowable. Legal expenses for the prosecution of claims against the Federal Government are unallowable.
17. Maintenance and repair – Costs incurred for necessary maintenance, repair or upkeep are allowable.
18. Materials and supplies – cost of materials and supplies necessary to carry out the grant program are allowable.
19. Memberships, subscriptions and professional activities – Membership costs are allowable.
20. Motor pools.
21. Payroll preparation.
22. Personnel administration – costs for the recruitment, examination, certification, classification, training, establishment of pay standards and related activities for grant programs are allowable.
23. Printing and reproduction – costs for printing and reproduction services necessary for grant administration are allowable. Publication costs of reports or other media relating to grant program accomplishments or results are allowable when provided for in the Grant Agreement.
24. Procurement service – the cost of procurement services and all phases of contract administration in providing goods, facilities and services for grant programs is allowable.

25. Taxes – in general, taxes or payments in lieu of taxes that the grantee agency is legally required to pay are allowable.
26. Training and education – in-service training customarily provided for employee development that directly or indirectly benefits grant programs is allowable. Out-of service training involving extended periods of time is allowable only when specifically authorized by the grant agency.
27. Transportation.
28. Travel.


The following costs are allowable only with the [approval of the grant agency](#):

1. Automatic data processing – This may include the cost of rental of equipment or depreciation on grantee-owned equipment. Acquisition of equipment is allowable only upon specific prior approval of the grant agency.
2. Building space and related facilities – Rental, maintenance and operation, rearrangements and alterations costs, and depreciation are allowable if required specifically for the grant program.
3. Capital expenditures – The cost of facilities, equipment, other capital assets and repairs that increase the value or useful life of capital assets is allowable when such procurement is specifically approved by the Federal agency.
4. Insurance and indemnification – Costs of insurance required, approved and maintained pursuant to the Grant Agreement are allowable.
5. Management studies – These costs are allowable (if they are to improve the effectiveness and efficiency of grant management), except that cost of studies performed by agencies other than the grantees must first be authorized by the Federal agency.
6. Pre-agreement costs – These costs are only allowable if specifically approved in the Grant Agreement. Please note that OPS will not approve these costs unless they have been approved by OPS before the grantee incurs the costs.
7. Professional services – These costs are allowable only if there is prior authorization from the funding agency.
8. Proposal costs – These costs are allowable, if provided for in the Grant Agreement.

The following costs are **unallowable**:

1. Bad debts.
2. Contingencies – Contributions to contingency reserves are not allowable.
3. Contributions and donations.
4. Entertainment.
5. Fines and penalties – Costs resulting from violations of or failure to comply with Federal, state and local laws and regulations are unallowable.
6. Governor’s expenses – This includes expenses of the Office of the Governor.
7. Interest and other financial costs – Only allowable if authorized by Federal legislation.
8. Legislative expenses – state legislature or other similar government body salaries and other expenses are unallowable.
9. Under-recovery of costs under Grant Agreements – Any excess of cost over the Federal contribution under one Grant Agreement is unallowable under other Grant Agreements.

Appendix D VETS Grantee Monitoring Instruments

As described in [Chapter Seven](#)  of this Guide, VETS staff prepare reports on both the quarterly review of grantee performance reports and the on-site monitoring visits. The following formats are typically used, and are provided here as resources for the grantee to understand more fully how the grantee program is monitored by VETS.

A. Quarterly Summary Report

The GOTR Quarterly Summary Report is completed in the following format:

I. PROFILE OF THE GRANT

Grantee Name:
 Grant Number: E - - - -
 Grantee Address:
 Contact Person:
 Telephone Number:
 Funding Level: (Grant Amount): \$
 (Non-Federal Funding): \$ [If Applicable, Report]

Period Of Performance: (Start Date):
 (End Date):
 Sub-Grantees/Consultants Funded By The Grant:
 [List Grantee Personnel And Their Responsibilities]

II. PROGRAM PERFORMANCE REVIEW

A. Is the grantee meeting expected goals for enrollment, training, and placement; i.e., is the activity within +/-15% of plan? Yes___No___

(1) If no, has the grantee addressed the problem by proposing strategies and procedures for increasing activity?

(2) Are **80%+** [all] participants involved in core training activities? Yes___No___

B. Is the training being provided as planned per quarter? Yes___No___

(1) Is the grantee placing applicants in unsubsidized employment in accordance with the average wage(s) proposed in their Grant Agreement? Yes___ No___

(2) If the actual placements vary from planned placements, does it appear that placement goals will be achieved by the end of the current program year? Yes___ No___

(3) Does the grantee have evidence it has monitored any sub-grantees or other service delivery sites during the report period? Yes___No___

III. Past Performance [This section is omitted, unless it applies to the grantee being reviewed.]

A. Did the grantee operate a VETS (JTPA IV-C, HVRP) grant in the last PY? Yes___ No___

B. If YES:
Was the grant close out completed? Yes___No___

C. Was a CAP initiated for a variance in actual grant accomplishments, did the grantee achieve their proposed goals (performance and financial)?
Yes___ No___ N/A___

IV. FINANCIAL REVIEW

Expenditures

A. Are the total amounts of Federal funding, being expended within plus or minus 15 percent of the rate planned in the grant for the time period evaluated (refer to the grant's approved SF 424A)?
Yes ___ No___

B. Are the expenditures being charged to the appropriate grant, as approved in the grant award document?
Yes___No___

C. Are the administrative costs charged to the grant within planned levels? (Such costs should not exceed the percentage set forth in the SGA or grant award without Grant Officer approval.) Yes___No___

D. Does the program have outside resources (funding or in-kind)? If yes, continue below.
Yes___ No___ N/A___

E. The forms of outside resources provided to this program by the approved grant are:
In the amount/value of
In the amount/value of
In the amount/value of
In the amount/value of

F. To date, are the same sources of outside resources, as reflected above, being committed/expended in the program?
Yes___No___

G. Are all costs allowable, allocable and reasonable? (See OMB Circular A-87.)
Yes___No___

Past Audits (see OMB Circular A-133) [This section on past audits should be omitted, unless it applies to the grantee being reviewed.]

A. What is the date of the last audit?

What organization/firm conducted the last audit?

Were there administrative findings? Yes___No___

If yes, were there questioned costs? Yes___No___

If yes, what was the status of this finding?

If there were disallowed costs, what is the amount? \$_____, and cost category?

If there were disallowed costs, has the grantee negotiated a payback schedule?

Yes___No___N/A___

Was a CAP initiated for a variance in expenditures, and is the grantee on schedule?

Yes___No___N/A___

If No, explain:

Have all the required reports been correctly prepared in accordance with the grant's special provisions and submitted in a timely manner? Yes___ No___

If no, specify:

V. ANALYSIS


Summarize strengths and weaknesses of the grantee's program observed from the desk review. If areas of concern are identified, attach any exhibits that have been collected to support these concerns. If exhibits are not available, be sure to identify how supporting data and information will be collected as part of an on-site visit.

Summary of the Desk Review

A. Program Strengths

B. Program Weaknesses

C. Potential Problematic Areas

As described in [Chapter Seven](#),  the GOTR typically develops and sends an agenda for the on-site Monitoring Review to the grantee prior to the visit. Below is a typical agenda for an on-site visit.

ON-SITE REVIEW AGENDA

I. ENTRANCE CONFERENCE

Review visit purpose. Explain what will be looked at, what will be looked for, who will be interviewed, and where work will be done. (Outline entrance discussion here.)

II. PROGRAM REVIEW

1. Interview staff responsible for program.

- a. Ask staff to briefly explain the program activities and their roles. Seek clarification of any unclear issues or potential problems identified in the desk review or during the entrance conference. Note observations.
- b. How does the grantee ensure that only targeted veterans are enrolled in the program?
- c. Have staff explain any formal or informal linkages with other agencies and organizations.
- d. Ask for staff appraisal of program performance and compare their information with the information you prepared during desk review.
- e. How is information for reports generated?

2. Review and document a sample of participant files.

- a. Are participants targeted veterans?
- b. Is all necessary information on participants and participant activity collected consistently?

3. Review program files for information on:

- a. how grantee tracks its own performance;
- b. how grantee tracks the performance of sub-grantees or contractors;
- c. how oversight, coordination, and technical assistance is provided and to whom; and,
- d. how required corrective actions are implemented and tracked.

ON-SITE REVIEW AGENDA (Continued)

4. Placement Review

- a. How are veterans recruited?
- b. Where are recruited veterans referred?
- c. How are referrals tracked?

III. EXIT CONFERENCE

1. Review your findings with grantee officials. Provide some overview of any major concerns. Describe the next steps you will take and what they can expect.

The GOTR typically uses a monitoring instrument, or checklists of information needed in conducting the on-site review of the grantee. Below are some samples of monitoring instruments.

FINANCIAL REVIEW CHECKLIST

GRANT STATUS: Data from last Financial Status Report SF-269

1. Percent of Grant Period completed (months in review period/months in Grant Period)
2. Percent of grant funds planned to be expended by the end of this reporting period. (from Grant Agreement)
3. Percent of grant funds expended (expended grant funds + obligated grant funds/total grant funds)
4. Percent matching funds planned to be expended by the end of this reporting period
5. Percent of matching funds expended (expended matching funds + obligated matching funds/total matching funds)

NOTE: Compute percentages of planned versus actual expenditures on the basis of approved quarterly budget. Do not assume expenditures should be the same in each Program Quarter.

6. Are SF-269(s) submitted on time and correctly prepared?

If No, why? What actions are being taken to ensure this will be done in the future?

GRANTEE - SUB-GRANTEE ARRANGEMENTS

1. If there is a sub-grantee, is the sub-grantee providing timely and correct financial reports to the grantee?
2. Does the grantee have a signed contract with the sub-grantee?
3. If so, does the contract specify the financial data to be provided to the grantee?
4. Does the contract provide a time frame for submitting financial data in time for the grantee to complete the SF-269 and submit it to the GOTR within the 30-day time frame?
5. Does the contract require the sub-grantee to report on expenditures and obligations separately from the expenditure and obligation of matching fund?
6. Are grant funds broken out separately for program and administrative (direct and indirect) expenses?
7. Does the contract require the sub-grantee to report by expenses by the Object Class Categories in Section B of the Budget Information submitted with the grant application?

If not, why?

GRANTEE CASH MANAGEMENT POLICY AND PROCEDURES

To test the grantee and sub-grantee cash management policy and procedures, the following items should be reviewed:

1. Is the grantee operating on the U.S. Department of Health and Human Services payment management system (HHS/PMS) via personal computer with SMARTLINK capability.

NOTE: Section II, Special Provisions, or the grant award provides for method of payments.

2. Is there written policy/procedures for draw-down of funds?
3. Is there a 24-hour turnaround for receiving cash for cash advances? If not, why? How many days does turnaround take?

NOTE: Turn around is from the date of receipt to the date of disbursement of funds.

GRANTEE CASH MANAGEMENT POLICY AND PROCEDURES
(continued)

- 4. How often are draw-downs normally made by the grantee?
- 5. If HHS/PMS is used, what problems, if any, has the grantee experienced? What is being done to try to resolve problems encountered?
- 6. Are procedures in place to ensure total grant funds requested are not in excess of quarterly allocation?
- 7. Does the accounting system provide disbursement data and cash balances on a daily basis by program?
- 8. Can the balance-on-hand amount be traced through the grantee's records?
- 9. Is the grantee earning interest on grant funds?
- 10. How often, if ever, is the interest returned to DOL?

NOTE: 29 CFR Part 95 and 24 CFR Part 97.21 requires grantees to remit interest earned on advances of Federal funds to DOL within 15 days after the end of the quarter in which the interest is earned. Is the grantee in compliance with this requirement?

NOTE: If advance payments are requested, an SF-272, Federal Cash Transaction Report, is required to be submitted within 15 working days following the end of each quarter.

FINANCIAL STATUS PROCEDURES

- 1. Does the grantee and/or sub-grantee have a system for allocating costs to the appropriate cost category?
- 2. Does the grantee and/or sub-grantee have a system for monitoring planned versus actual costs and for taking corrective action, when needed?
- 3. Does the grantee and/or sub-grantee have a system for monitoring administrative costs?

NOTE: There is a maximum limit for administrative (indirect) costs on program grants.

What is the number of staff?

Are they paid with:

Grant funds _____

Matching funds _____

FINANCIAL STATUS PROCEDURES
(continued)

4. Is there adequate documentation to support cost allocations for paid staff? For example, are there time sheets or written policy statements or directives covering staff who split their time between this program and other programs?

5. Does the grantee and/or sub-grantee have an approved indirect Cost Rate? If yes, what is it?

Grantee _____

Sub-grantee _____

6. Does the review show the indirect costs are paid properly?

NOTE: To be paid properly, indirect costs may not be:

- Prepaid;
- Above the allowed percentage; or
- Above the lump sum percentage.

7. Are there adequate expenditure break-outs for comparison of Object Class Category expenses shown in Section B of the Budget Information Form by both the grantee and sub-grantee?

C. On-site Monitoring Review Format

After an on-site monitoring visit, the GOTR is required to prepare a written report to document the findings of the visit. Such reports typically follow the format outlined below.

I. PROFILE OF THE GRANT

Grantee name:

Grant number: E - - - -

Grantee address:

Contact person:

Telephone number:

Funding level: (Grant amount): \$

(Non federal funding): \$

Period of performance: (Start Date):

(End Date):

Sub-Grantee(s) funded by the grant:

II. ABSTRACT (KEY FINDINGS)

- a. Major Points of the Review
- b. Compliance Issues
- c. Recommendations for Improvement

III. PROGRAM DESIGN

- a. Applicant Approach:
 - (1) Planned:
 - (2) Actual:
- b. Sub-Applicant(s) Approach: (if applicable)
 - (1) Planned
 - (2) Actual

IV. PROGRAM FEATURES: (See IV.a for VWIP Grant Assessment Outline or IV.b for HVRP Grant Assessment Outline)

- a. VWIP Grant Assessment (See VWIP SGA)
 - 1. Mandatory Program Activity (Ref SGA D.2(d)(1))
 - A. Utilization of LVER/DVOP in pre-enrollment assessment.
 - (1) How are LVER/DVOP participating in EDP pre-enrollment assessment?
 - (2) What role do they play?
 - B. Utilization of LVER/DVOP in the EDP process.
 - (1) How are LVER/DVOP participating in EDP development?
 - (2) What role do they play?

- C. EDP for each Veteran enrolled.
 - (1) Does each enrolled veteran have an EDP?
 - (2) Are the records of the EDP adequate?
- D. EDP includes (at a minimum) income/barriers/service needs:
 - (1) Are Income needs identified?
 - (2) Are barriers/skills deficiencies noted/documented?
 - (3) Were service needs described?
- E. 80% or more of enrolled veterans receive Core Training (Ref SGA D.2.(d)(1)(c))
 - (1) Is Core Training documented in case files?
 - (2) Was Core Training consistent with the SGA/Grant?
 - (3) Did 80% or more of all enrolled veterans receive core training?
- F. Utilize LVER/DVOP staff for job placement and follow-up.
 - (1) How are LVER/DVOP participating in placement/follow-up?
 - (2) What role do they play?

2. Optional Program Activities: Ancillary or Support Services

- A. Not more than 20% of enrolled veterans receive only Ancillary or Support Services that lead directly to employment meeting minimum economic needs of the applicant.
 - (1) Was Ancillary/Support Service documented in case files?
 - (2) Did 20% or fewer of all enrolled veterans receive only Ancillary/Support Services leading directly to employment?
- B. Ancillary or Support Services provided are consistent with the approved grant and SGA. (Ref SGA D.2.(d)(2)(a))
 - (1) Were such services provided based on a documented determination of client need?
 - (2) Were Ancillary/Support Services provided consistent with the SGA/Grant?

b. HVRP Grant Assessment

1. Participant Eligibility

- A. Were enrolled clients homeless individuals?
- B. Were enrolled individuals veterans?

2. Required Features

- A. Have veterans who have experienced homelessness been employed for outreach or direct client contacts?
- B. Have linkages with other programs and services been established (including DVOP and LVER)?
- C. Are documented client services employment focused (such as increasing the clients employability or matching homeless veterans with potential employers)?

3. Scope of Program Design

- A. Are program operations conducted, to the degree practical, at shelters, day centers, soup kitchens or similar locations?
- B. Is coordination evident with LVER/DVOP, SWA, WIBs, One-Stop-Centers, VWIP projects?
- C. Have community awareness activities taken place?
- D. Is coordination evident with VA facilities in the area?
- E. Is coordination evident with veteran service organizations?
- F. Are necessary referrals of clients made to:
 - treatment services,
 - rehabilitation services,
 - counseling services,
 - housing assistance,
 - employment and job training services?
- G. Was Stand Down support planned and provided?

YTD Performance Goals

- a. Planned:
- b. Actual:

Budget/Administration

- a. Planned
- b. Actual
- c. Suggested questions:
 - (1) Do actual staffing levels agree with those described in the grant?
 - (2) Does the grantee have documenting evidence of expenditures (i.e., sub-agreements, invoices, purchase orders, travel costs, equipment, supplies)?
 - (3) Does the grantee have a system of internal controls (i.e. Audits)?
 - (4) Does the grantee have a process for allocating costs for the grant funds (and outside/in-kind funds if applicable)?
 - (5) Are cost categories, e.g., OJT and classroom training, and supportive service costs, being tracked separately?
 - (6) Is there a system to de-obligate unused funds from individual Sub-contracts?
 - (7) Were required grant reports (Technical and Financial) submitted on time?
 - (8) Does the funding plan, SF269 and SF272 show consistency?

Corrective Action:

- A. Documentation of compliance issue:
- B. Action(s) required:
- C. Time frame for compliance:

Recommendations for Improvement(s)

- A. Issue(s):
- B. Action(s) recommended:

Narrative summary of findings

- A. Summary of program performance
- B. Discuss exceptional accomplishments/serious problems.

Appendix E Related Resources

VETS Grant Application Forms:

Application for Federal Assistance (SF424)

<http://www.whitehouse.gov/omb/grants/sf424.pdf>

Budget Information Sheet (SF424A)

<http://www.whitehouse.gov/omb/grants/sf424a.pdf>

Financial Status Report, Short Form (SF-269A)

<http://www.whitehouse.gov/omb/grants/sf269a.pdf>

Office of Management and Budget Circulars:

OMB Circular A-21 "Cost Principles for Educational Institutions and Hospitals"

<http://www.whitehouse.gov/omb/circulars/a021/a021.html>

OMB Circular A-87 "Cost Principles for State, Local, and Indian Tribal Governments"

<http://www.whitehouse.gov/omb/circulars/a087/a087-all.html>

OMB Circular A-122 "Cost Principles for Non-Profit Organizations"

<http://www.whitehouse.gov/omb/circulars/a122/a122.html>

OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations"

<http://www.whitehouse.gov/omb/circulars/a133/a133.html>

Department of Labor Websites:

Department of Labor

<http://www.dol.gov/>

Department of Labor, Veterans' Employment and Training Service (DOL/VETS)

<http://www.dol.gov/vets/>

VETS programs/services

<http://www.dol.gov/vets/programs/main.htm>

DOL Business Operations Center – Information on Cost Principles and Procedures for Non-Profit Organizations

<http://www.dol.gov/oasam/programs/boc/ocd-guide-main.htm>

DOL's Office of Cost Determination

<http://www.dol.gov/oasam/programs/boc/ocd-guide-main.htm>

DOL's Occupational Information Network (O*Net)

http://www.doleta.gov/programs/onet/onet_default.asp

National Veterans' Training Institute

<http://nvti.cudenver.edu/new/default.htm>

Other Websites:

U.S. Department of Housing and Urban Development

<http://www.hud.gov/>

U.S. Department of Veterans Affairs

<http://www.va.gov/>

U.S. Department of Health and Human Services

<http://www.hhs.gov>

Federal government's grants website

<http://www.grants.gov>

Office of Personnel Management

<http://www.opm.gov/veterans/html/vgmedal2.htm>

Code of Federal Regulations at 29 CFR 92.5 and 95

http://www.access.gpo.gov/nara/cfr/waisidx_01/29cfrv1_01.html

Catalog of Federal Domestic Assistance (CFDA)

(For CFDA number and other assistance on applying for Federal grants)

<http://www.cfda.gov/default.htm> and

<http://www.cfda.gov/public/allprogs.asp>

Appendix F

Glossary of Terms

Adequate Employment - See Unsubsidized Employment.

Administrative Costs - All direct and indirect costs associated with the supervision and management of the program. These costs shall include the administrative costs, both direct and indirect, of recipients and sub-recipients of the grant funds.

Adult Basic Education - Education for adults whose inability to speak, read or write the English language or to effectively reason mathematically, constitutes a substantial impairment of their ability to get or retain employment commensurate with their real ability, which is designed to help eliminate such inability and raise the level, of education of such individuals with a view to making them less likely to become dependent on others, to improve their ability to benefit from occupational training and otherwise increase their opportunities for more productive and profitable employment, and to make them better able to meet their adult responsibilities.

Ancillary Services - Employment and training related activities other than core training that may enhance a participant's employability.

Apprenticeship Training - A formal occupational training program that combines on-the-job training and related instruction and in which workers learn the practical and conceptual skills required for a skilled occupation, craft, or trade. It may be registered or unregistered.

Assurances and Certifications - The act of certifying compliance with applicable federal and state laws and regulations regarding the receipt and expenditures of grant monies.

ASVET - Assistant Secretary for Veterans' Employment and Training (USDOL)

Average Wage at Placement - This is an average of the wages earned by participants upon entering employment.

Barriers to Employment - Characteristics that may hinder an individual's hiring, promotion or participation in the labor force. Some examples of individuals who may face barriers to employment include: single parents, displaced homemakers, youth, public assistance recipients, older workers, substance abusers, teenage parents, veterans, ethnic minorities, and those with limited English speaking ability or a criminal record or with a lack of education, work experience, credentials, child care arrangements, transportation or alternative working patterns.

Case Management - A client-centered approach in the delivery of services, designed to prepare and coordinate comprehensive employment plans for participants, to assure access to the necessary training and supportive services, and to provide support during program participation and after job placement. In accordance with this definition, the

case manager acts as a facilitator in assisting the participant toward a successful completion of training.

Classroom Training - Any training of the type normally conducted in an institutional setting, including vocational education, which is designed to provide individuals with the technical skills and information required to perform a specific job or group of jobs. It may also include training designed to enhance the employability of individuals by upgrading basic skills, throughout the provision of courses such as remedial education, training in the primary language of persons with limited English language proficiency, or English as a second language (ESL) training.

Close out - Grant close out is the process by which the Federal grantor agency (in the case of VETS grants, DOL) determines that all applicable administrative actions and all required work of the grant have been completed by the grantee and the grantor.

Cognizant Federal Agency - The federal agency that is assigned audit or indirect cost rate approval responsibility for a particular recipient organization by the Office of Management and Budget. (OMB Circulars A-87, A-102)

Community-based organization (CBO) - means a private non-profit organization that is representative of a community or a significant segment of a community and that has demonstrated expertise and effectiveness in the field of workforce investment.

Core Training - Core training activities are employment-focused interventions which address basic vocational skills deficiencies that prevent the participant from accessing appropriate jobs and/or occupations.

Cost per placement - The cost per placement into unsubsidized employment is obtained by dividing the total grant funds expended by the total number of direct placements, plus assisted placements.

Counseling - Counseling in this sense can be any form of assistance which (1) provides guidance in the development of a participant's vocational goals and the means to achieve those goals; and/or (2) assist a participant with the solution to a variety of individual problems which may pose a barrier(s) to the participant in achieving vocational goals, e.g., PTSD counseling, substance abuse counseling, job counseling, etc.

Customized Training - A training program designed to meet the special requirements of an employer who has entered into an agreement with a Service Delivery Area to hire individuals who are trained to the employer's specifications. The training may occur at the employer's site or may be provided by a training vendor able to meet the employer's requirements. Such training usually requires a commitment from the employer to hire a specified number of trainees who satisfactorily complete the training.

Disabled Veteran - A veteran who is entitled to compensation under laws administered by the Veterans Administration; or an individual who was discharged or released from active duty because of service-connected disability.

Disallowed Costs - Disallowed costs are those charges to a grant that the grantor agency (or its representative) determines to be unallowable in accordance with the applicable Federal Cost Principles or other conditions contained in the grant.

DVET - Director for Veterans' Employment and Training

DVOP - Disabled Veterans' Outreach Program specialist

Economically Disadvantaged – An individual who (A) receives, or is a member of a family which receives, cash welfare payments under a Federal, state, or local welfare program; (B) has, or is a member of a family which has, received a total family income for the six-month period prior to application for the program involved (exclusive of unemployment compensation, child support payments, and welfare payments) which, in relation to family size, was not in excess of the higher of (i) the official poverty line (as defined by the Office of Management and Budget, and revised annually in accordance with section 673 (2) of the Omnibus Budget Reconciliation Act of 1981 (42 U.S.C. 9902(2)), or (ii) 70 percent of the lower living standard income level; (C) is receiving (or has been determined within the 6-month period prior to the application for the program involved to be eligible to receive) food stamps pursuant to the Food Stamp Act of 1977; (D) qualified as a homeless individual under section 103 of the Stewart B. McKinney Homeless Assistance Act; (E) is a foster child on behalf of whom state or local government payments are made or (F) in cases permitted by regulations of the Secretary, is an individual with a disability whose income meets the requirements of clause (A) or (B), but who is a member of a family whose income does not meet such requirements.

Employment Development Plan (EDP) - An individualized written plan or intervention strategy for serving an individual which, as a result of an assessment of the veteran's economic needs, vocational interests, aptitudes, work history, etc., defines a reasonable vocational or employment goal and the developmental services or steps required to reach the goal and which documents the accomplishments made by the individual.

Employment Service - the state level organization or public labor exchange system affiliated with DOL's United States Employment Service.

Entered Employment Rate - This is a method used to determine the percentage of participants who become employed. The percentage is calculated by dividing the number of total participants who were enrolled in the program by the number of participants who were placed or entered employment through the program.

ETA - The Employment and Training Administration

Enrolled Veteran - Shall be synonymous with the term participant. A veteran who has been determined eligible for services at intake and who is receiving or scheduled to receive core training.

Follow-up - The tracking of what happens to participants when they leave the program for a period of 180 days after initial placement. The reporting requirements are to include the following data/information employment status (number of Entered Employments/Placements at 180 days after program has ended), average hourly wage

(earnings change at 180 days after program has ended), and job retention (of those enrolled in training, provide number of those still employed in trained occupation at 180 days after program has ended), these measures can be used to assess long-term program performance and activity strategies for clients with diverse characteristics.

FTE - Full-time Equivalent, a personnel charge to the grant equal to 2,080 hours per annum.

FY - Fiscal Year. For federal government purposes, any twelve-month period beginning on October 1 and ending on September 30.

GED - General Equivalency Diploma. A high school equivalency diploma that is obtained by passing the General Educational Diploma Equivalency Test that measures the application of skills and knowledge generally associated with four years of traditional high school instruction.

Homeless or homeless individual - includes persons who lack a fixed, regular, and adequate nighttime residence. It also includes persons whose primary nighttime residence is either a supervised public or private shelter designed to provide temporary living accommodations; an institution that provides a temporary residence for individuals intended to be institutionalized; or a private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings. [Reference 42 U.S.C., Section 11302 (a)]

In-kind services - Property or services which benefit a federally assisted project or program and which are contributed without charge to the grantee.

Indirect Cost - A cost that is incurred for a common or joint purpose benefiting more than one cost objective and that is not readily assignable to the cost objectives specifically benefited.

Institutional Skills Training - Skills training conducted in an institutional setting and designed to ensure that individuals acquire the skills, knowledge and abilities necessary to perform a job or group of jobs in an occupation for which there is a demand.

Intake - A process for screening individual applicants for eligibility; making an initial determination whether the program can benefit the applicants; providing information about the program, its services and the availability of those services; and selecting individual applicants for participation in the program.

Job Club Activities - A form of job search assistance provided in a group setting. Usually job clubs provide instruction and assistance in completing job applications and developing resumes and focus on maximizing employment opportunities in the labor market and developing job leads. Many job clubs use telephone banks and provide group support to participants before and after they interview for openings.

Job Development - The process of marketing a program participant to employers, including informing employers about what the participant can do and soliciting a job interview for that individual with the employer.

Job Placement Services - Job placement services are geared towards placing participants in jobs and may involve activities such as job search assistance, training, or job development. These services are initiated to enhance and expedite participants' transition from training to employment.

Job Search Assistance (JSA) - An activity that focuses on building practical skills and knowledge to identify and initiate employer contacts and conduct successful interviews with employers. Various approaches may be used to include participation in a job club, receive instruction in identifying personal strengths and goals, resume and application preparation, learn interview techniques, and receive labor market information. Job search assistance is often a self-service activity in which individuals can obtain information about specific job openings or general job or occupational information.

Labor Exchange - Refers to the services provided to job seekers and employers by the State Employment Service Agencies, WIA Service -Delivery Areas, or other entities. Services to job seekers may include assessment, testing, counseling, provision of labor market information and referral to prospective employers. Employer service may include accepting job orders, screening applicants, referring qualified applicants and providing follow-up.

Labor Force - The sum of all civilians classified as employed and unemployed and members of the Armed Forces stationed in the United States. (Bureau of Labor Statistics Bulletin 2175)

Labor market area - an economically integrated geographic area within which individuals can reside and find employment within a reasonable distance or can readily change employment without changing their place of residence.

Literacy and Bilingual Training - See Adult Basic Education.

LVER - Local Veterans' Employment Representative

Minimum Economic Need - The level of wages paid to a program participant that will enable that participant to become economically self-sufficient.

Minority Veterans - For the purposes of the HVRP and VWIP programs, veterans who are Workforce Investment Act (WIA)-eligible and are members of the following ethnic categories: African American, Hispanic, American Indian or Alaskan Native, Asian or Pacific Islander.

Occupational Skills Training - Includes both (1) vocational education which is designed to provide individuals with the technical skills and information required to perform a specific job or group of jobs, and (2) on-the-job training.

Offender - Any adult or juvenile who has been subject to any stage of the criminal justice process for whom services under this Act may be beneficial or who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

OASVET - Office of the Assistant Secretary for Veterans' Employment and Training (ASVET)

On-the-job training (OJT) - means training by an employer that is provided to a paid participant while engaged in productive work in a job that-- (A) provides knowledge or skills essential to the full and adequate performance of the job; (B) provides reimbursement to the employer of up to 50 percent of the wage rate of the participant, for the extraordinary costs of providing the training and additional supervision related to the training; and (C) is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate. Usually in the OJT agreement, this is a promise on the part of the employer to hire the trainee upon successful completion of the training.

On-site Industry-specific Training - This is training which is specifically tailored to the needs of a particular employer and/or industry. Participants may be trained according to specifications developed by an employer for an occupation or group of occupations at a job site. Such training is usually presented to a group of participants in an environment or job site representative of the actual job/occupation, and there is often an obligation on the part of the employer to hire a certain number of participants who successfully complete the training.

Outreach - An active effort by program staff to encourage individuals in the designated service delivery area to avail themselves of program services.

Outside Funds - Resources pledged to the grant program that have a quantified dollar value. Such resources may include training funds from programs such as WIA Title I that are put aside for the exclusive use by participants enrolled in a program. Outside funds do not include in-kind services.

Participant - means an individual who has been determined to be eligible to participate in and who is receiving services (except follow up services authorized under this title) under a program authorized by this title. Participation shall be deemed to commence on the first day, following determination of eligibility, on which the individual began receiving subsidized employment, training, or other services provided under this title. **An individual who receives only outreach and/or intake and assessment services does not meet this definition.**

Placement - The act of securing unsubsidized employment for or by a participant.

Pre-apprenticeship Training - Any training designed to increase or upgrade specific academic, or cognitive, or physical skills required as a prerequisite for entry into a specific trade or occupation.

Pre-enrollment Assessment - The process of determining the employability and training needs of individuals before enrolling them into the program. Individual factors usually addressed during pre-enrollment assessment include: an evaluation and/or measurement of vocational interests and aptitudes, present abilities, previous education and work experience, income requirements, and personal circumstances.

Program Resources - Includes the total of both program or grant and outside funds.

PY - Program Year. The 12-month period beginning July 1, and ending, on June 30, in the fiscal year for which the appropriation is made.

Recently Separated Veteran - Refers to any veteran who applies for participation in a funded activity within 48 months after separation from military service.

Remedial Education - Educational instruction, particularly in basic skills, to raise an individual's general competency level in order to succeed in vocational education or skill training programs, or employment.

Service-Connected Disabled - Refers to (1) a veteran who is entitled to compensation under laws administered by the Department of Veterans' Affairs (VA), or (2) an individual who was discharged or released from active duty because of a service-connected disability. (29 U.S.C., Chapter 19, section 1503(27)(B))

SGA - Solicitation for Grant Application

Subgrant - An award of financial assistance in the form of money, or property in lieu of money, made under a grant by a grantee to an eligible subgrantee.

Subgrantee - The government or other legal entity to which a subgrant is awarded and which is accountable to the grantee for the use of the funds provided.

Suitable Employment - See "Unsubsidized Employment"

Substance Abuser - An individual dependent on alcohol or drugs, especially narcotics, whose dependency constitutes or results in a substantial barrier to employment.

Supportive Services - means services which are necessary to enable an individual eligible for training, but who cannot afford to pay for such services, to participate in a training program funded under the grant. Such supportive services may include transportation, health care, financial assistance, (except as a post-termination service), drug and alcohol abuse counseling and referral, individual and family counseling, special services and materials for individuals with disabilities, job coaches, child care and dependent care, temporary shelter, financial counseling, and other reasonable expenses required for participation in the training program and may be provided in-kind or through cash assistance.

Unsubsidized Employment - Employment not financed from funds provided under the grant. In the grant program the term "adequate" or "suitable" employment is also used to

mean placement in unsubsidized employment which pays an income adequate to accommodate the participant's minimum economic needs.

Upgrading and Retraining - Training given to an individual who needs such training to advance above an entry level or dead-end position. This training shall include assisting veterans in acquiring needed state certification to be employed in the same field as they were trained in the military (i.e., Commercial Truck Driving License (CDL), Emergency Medical Technician (EMT), Airframe & Power plant (A&P), Teaching Certificate, etc.).

USDOL - United States Department of Labor

VA - United States Department of Veterans Affairs (Formerly the Veterans Administration).

Veteran - shall refer to an individual who served in the United States active military, naval, or air service, and who was discharged or released there from under conditions other than dishonorable.

Veterans' Workforce Investment Program (VWIP) - Reference made to the "VWIP Program" means all activity funded by VWIP and outside resources.

VWIP Resources - This term is synonymous with VWIP funds/funding.

Vocational Exploration Training - Through assessments such as interest inventories and/or counseling, a process of identifying occupations or occupational areas in which a person may find satisfaction and potential, and for which his or her aptitudes and other qualifications may be appropriate.

Welfare and/or Public Assistance recipient - An individual who, during the course of the program year, receives or is a member of a family who receives cash welfare or public assistance payments under a Federal, state, or local welfare program.

Workforce Investment Act (WIA) - The purpose of this Act is to establish programs to prepare youth and unskilled adults for entry into the labor force and to afford job training to those economically disadvantaged individuals and other individuals, including veterans, who face serious barriers to employment and who are in need of such training to obtain prospective employment. The Act requires the ASVET to consult with the Secretary of the DEPARTMENT OF VETERANS AFFAIRS to ensure that programs funded under VWIP of this Act meet the employment and training needs of service-connected disabled, Campaign and recently separated veterans and are coordinated, to the maximum extent feasible, with-related programs and activities.

Work Experience - A temporary activity (six months or less) which provides an individual with the opportunity to acquire the skills and knowledge necessary to perform a job, including appropriate work habits and behaviors, and which may be combined with classroom or other training. When wages are paid to a participant on work experience and when such wages are wholly paid for under WIA, the participant may not receive this training under a private, for profit employer.

Youth - An individual, between the age of 20 and 24 years of age, who served on active duty in the U.S. Armed Forces.

APPLICATION FOR FEDERAL ASSISTANCE

OMB Approval No. 0348-0043

1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction Preapplication <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		2. DATE SUBMITTED	Applicant Identifier
		3. DATE RECEIVED BY STATE	State Application Identifier
		4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier
5. APPLICANT INFORMATION			
Legal Name:		Organizational Unit:	
Address (give city, county, State, and zip code):		Name and telephone number of person to be contacted on matters involving this application (give area code)	
6. EMPLOYER IDENTIFICATION NUMBER (EIN): <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>		7. TYPE OF APPLICANT: (enter appropriate letter in box) <input type="checkbox"/>	
8. TYPE OF APPLICATION: <input type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) <input type="checkbox"/> <input type="checkbox"/> A. Increase Award B. Decrease Award C. Increase Duration D. Decrease Duration Other(specify): _____		A. State B. County C. Municipal D. Township E. Interstate F. Intermunicipal G. Special District H. Independent School Dist. I. State Controlled Institution of Higher Learning J. Private University K. Indian Tribe L. Individual M. Profit Organization N. Other (Specify) _____	
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/>		9. NAME OF FEDERAL AGENCY:	
12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): TITLE: _____		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:	
13. PROPOSED PROJECT		14. CONGRESSIONAL DISTRICTS OF:	
Start Date	Ending Date	a. Applicant	b. Project
15. ESTIMATED FUNDING:		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?	
a. Federal	\$.00	a. YES. THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON: DATE _____ b. No. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372 <input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW	
b. Applicant	\$.00		
c. State	\$.00		
d. Local	\$.00		
e. Other	\$.00		
f. Program Income	\$.00		
g. TOTAL	\$.00		
18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT, THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.		17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?	
a. Type Name of Authorized Representative		<input type="checkbox"/> Yes If "Yes," attach an explanation. <input type="checkbox"/> No	
d. Signature of Authorized Representative		b. Title	
		c. Telephone Number	
		e. Date Signed	

INSTRUCTIONS FOR THE SF-424

Public reporting burden for this collection of information is estimated to average 45 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0043), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

This is a standard form used by applicants as a required facesheet for preapplications and applications submitted for Federal assistance. It will be used by Federal agencies to obtain applicant certification that States which have established a review and comment procedure in response to Executive Order 12372 and have selected the program to be included in their process, have been given an opportunity to review the applicant's submission.

- | Item: | Entry: | Item: | Entry: |
|-------|---|-------|--|
| 1. | Self-explanatory. | 12. | List only the largest political entities affected (e.g., State, counties, cities). |
| 2. | Date application submitted to Federal agency (or State if applicable) and applicant's control number (if applicable). | 13. | Self-explanatory. |
| 3. | State use only (if applicable). | 14. | List the applicant's Congressional District and any District(s) affected by the program or project. |
| 4. | If this application is to continue or revise an existing award, enter present Federal identifier number. If for a new project, leave blank. | 15. | Amount requested or to be contributed during the first funding/budget period by each contributor. Value of in-kind contributions should be included on appropriate lines as applicable. If the action will result in a dollar change to an existing award, indicate <i>only</i> the amount of the change. For decreases, enclose the amounts in parentheses. If both basic and supplemental amounts are included, show breakdown on an attached sheet. For multiple program funding, use totals and show breakdown using same categories as item 15. |
| 5. | Legal name of applicant, name of primary organizational unit which will undertake the assistance activity, complete address of the applicant, and name and telephone number of the person to contact on matters related to this application. | 16. | Applicants should contact the State Single Point of Contact (SPOC) for Federal Executive Order 12372 to determine whether the application is subject to the State intergovernmental review process. |
| 6. | Enter Employer Identification Number (EIN) as assigned by the Internal Revenue Service. | 17. | This question applies to the applicant organization, not the person who signs as the authorized representative. Categories of debt include delinquent audit disallowances, loans and taxes. |
| 7. | Enter the appropriate letter in the space provided. | 18. | To be signed by the authorized representative of the applicant. A copy of the governing body's authorization for you to sign this application as official representative must be on file in the applicant's office. (Certain Federal agencies may require that this authorization be submitted as part of the application.) |
| 8. | Check appropriate box and enter appropriate letter(s) in the space(s) provided:

-- "New" means a new assistance award.

-- "Continuation" means an extension for an additional funding/budget period for a project with a projected completion date.

-- "Revision" means any change in the Federal Government's financial obligation or contingent liability from an existing obligation. | | |
| 9. | Name of Federal agency from which assistance is being requested with this application. | | |
| 10. | Use the Catalog of Federal Domestic Assistance number and title of the program under which assistance is requested. | | |
| 11. | Enter a brief descriptive title of the project. If more than one program is involved, you should append an explanation on a separate sheet. If appropriate (e.g., construction or real property projects), attach a map showing project location. For preapplications, use a separate sheet to provide a summary description of this project. | | |