#### OFFICE OF GRANTS MANAGEMENT 200 CONSTITUTION AVENUE NW - ROOM N-4716 WASHINGTON D.C. 20210



RE: Job Corps Scholars (JCS) Program Grants

Dear JCS Grantee Authorized Representatives:

This letter serves to ensure consistency among grantees with performance reporting (as outlined in the FOA-ETA-20-03) and clarifying the definition of "participant" to ensure alignment with the Training and Employment Guidance Letter (TEGL) 14-18, Attachment 3.

### **Background:**

The term "participant" varies across programs, but is generally understood within the Department Labor's (DOL) Employment and Training Administration (ETA) programs to be an individual who is the direct recipient of a grant-funded service.

JCS performance data are reported in ETA's Workforce Integrated Performance System (WIPS), through the Grantee Data Collection Tool. The Grantee Data Collection Tool provides data outputs in alignment with the approved Participant Individual Record Layout (PIRL), for which ETA has received OMB approval (OMB No. 1205-0521) for those data elements that comprise the Office of Job Corps' subset of the PIRL.

## **Clarification and Updated Guidance:**

Included below is updated guidance on the definition of "participant", "allowable cost", and "grant-funded service" to ensure compliance with performance and reporting requirements.

## **Definition of a Participant:** (Clarification)

A participant is an individual who receives a grant-funded service after a determination of eligibility, and for whom the grantee will collect all relevant data for each individual for performance reporting purposes. JCS participants must satisfy all of the following criteria:

- Individuals must meet the eligibility criteria according to Policy and Requirements Handbook (PRH) Chapter 1, Exhibit 1-1 (reference JCS <u>Eligibility Guide</u>)
- Newly enrolled at the college and actively enrolled in a career technical training (CTT) program; and
- The direct recipient of a grant-funded service (see definition below).

### **Definition of an Allowable Cost:**

All proposed project costs must be **necessary** and **reasonable** and in accordance with Federal guidelines. Determinations of allowable costs will be made in accordance with the Cost Principles, now found in the Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit

Requirements for Federal Awards (Uniform Guidance), codified at 2 CFR Part 200 and at 2 CFR Part 2900 (Uniform Guidance-DOL specific).

Allowable costs examples include: intake assessments, participant outreach and recruitment activities, program development costs, and eligibility determination costs (see FOA-ETA-20-03 pages 4-5, and 10-13).

**Disallowed costs** are those charges to a grant that DOL determines not to be allowed in accordance with the Cost Principles or other conditions contained in the grant.

## **Definition of a Grant-Funded Service:**

Grant-funded services are *allowable services* applicable to the grantee's statement of work (SOW). These grant-funded services that trigger participation under the JCS program must be:

- 1) an allowable cost for a participant activity;
- 2) a cost that is allocable;
- 3) a service that is of benefit to the participant;
- 4) a service which they would not have received without benefit of the grant; and
- 5) adequately documented (both the expenditure and recipient receipt of service).

For the purposes of the JCS grants, the FOA-ETA-20-03 identifies the following grant-funded services: Career Technical Training (CTT), Personal and Career Counseling, Employment Counseling, and Support Services.

NOTE: Although participant outreach and recruitment activities, program development costs, and eligibility determination are allowable uses of grant funds, they do not qualify as a grant-funded service because they do not trigger participation in a CTT (does not meet the definition of a participant).

# Meeting Minimum Participant Served Goals and Reporting Performance Outcomes

Each grantee's agreement includes a set number of enrollees committed to separate, meaning completing up to 12 months of CTT. Grantees must meet the performance targets for each metric below per their individual grant agreements:

- Job Corps Scholars Separation Rate (i.e., completion of the 12-month training certification program);
- Job Corps Scholars Dropout Rate (i.e., withdrawal, dismissal, or termination from the grantee institution or the Job Corps Scholars Program);
- Job Corps Scholars Qualifying Placement Rate Upon Separation (number and percent);
- Job Corps Scholars Qualifying Placement Rate During the 12-month Employment Counseling Period Post-Separation;
- Job Corps Scholars Average Starting Salary/Wage When in a Qualifying Placement Upon Separation;
- Job Corps Scholars Average Salary/Wage When in a Qualifying Placement 12 months After Separation;
- Job Corps Scholars Average Earned Academic Credit Hours;
- Job Corps Scholars Enrolled in the Armed Services Upon Separation;
- Job Corps Scholars Enrolled in an Apprenticeship Program Upon Separation (number

and percentage); and

• Job Corps Scholars with Full-time Employment Upon Separation.

## **Action Required:**

- Review your grant agreement performance targets
- Review the current JCS grant policy on <u>Leveraged Resources</u>
- Develop internal controls to track performance targets

Should you have any questions regarding the above, please contact your FPO.

Sincerely,

Melissa Abdullah

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**Grant Officer**