

UNITED STATES DEPARTMENT OF LABOR

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FY 2007 COMBATING EXPLOITIVE CHILD LABOR
THROUGH EDUCATION BIDDERS' MEETING

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Thursday,
June 14, 2007

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The meeting was called to order at 9:30 a.m., in the DOL Auditorium, U.S. Department of Labor, 200 Constitution Avenue, N.W., Washington, D.C., Marcia Eugenio, Host, presiding.

PRESENT:

MARCIA EUGENIO	Director, Office of Child Labor, Forced Labor, and Human Trafficking (OCFT)
DENNIS ADELSON	Counsel for Appropriations and Contracts, SOL
TROY HARGROVE	Office of Procurement Services, OASAM
EILEEN MUIRRAGUI	Latin America and Caribbean Division Chief, OCFT
AMY RITUALO	International Relations Officer, Operations Division, OCFT
KEVIN WILLCUTTS	Deputy Director, OCFT

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ALSO PRESENT:

HELENE AIELLO
VINCE AMNOGESIA
BRENDA ARRINGTON
ANABELLA BRUCH
CHARITA CASTRO
TONY DOGGETT
SYLVIA ELLISON
TONYA GIANNONI
SUDHANSHU JOSHI
RUSS KLEIN
ANTHONY KOOMSON
MARC LEVIN
ARIANNA LEVITUS
BETH LINDLEY
RACHELLE MARTINEZ
INGRID MARTONOVA
MICHAL MURPHY
QUY NGUYEN
BARBARA PANDO-BEHNKE
TANYA RASA
RACHEL RIGBY
JESSICA SEACOR
LILY STERN
JOHN TREW
VICKY WALKER

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P-R-O-C-E-E-D-I-N-G-S

9:39 a.m.

MS. EUGENIO: Good morning, everyone. In the interest of time, I think we're going to get started. I would like to welcome all of you to the Department of Labor and to our Bidder's Meeting for the FY 2007 Grant for the Department of Labor.

My name is Marcia Eugenio and I'm the Director of the Office of Child Labor, Forced Labor, and Human Trafficking. I know that you all got a copy of the SGA, "Hot Off the Press," so I know I'm competing for your attention right now. Just a word of advice, I know you'll want to take a look at the SGA but the presentations that are going to be made are important for you to pay attention and to listen to. I will ask you to focus on these presentations and to ask as many questions as you have to help you in preparing your applications for the solicitation.

We are glad to see so many of you here today and to see so many different organizations represented. It shows us that the work that we do is important and that a

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1 lot of different organizations are interested
2 in collaborating with us in this effort. The
3 administration places a great deal of
4 importance on competition. And as you can see
5 from this year's solicitation, we are going
6 to be competing about ten projects, direct
7 action projects in ten countries and in
8 addition to that, a research project that will
9 include three other countries.

10 Today we'll be providing you with
11 further clarification on the SGA. One thing
12 that I want to mention and for you to note is
13 that regardless of what we say here today,
14 when you're preparing your application, the
15 definitive source of reference should be the
16 solicitation. So in order for your
17 application to be responsive, you have to be
18 able to respond to the requirements of the
19 solicitation.

20 As I mentioned, we're going to have
21 a number of presentations here today. First,
22 we will provide you with an overview of our
23 office, the goals that we seek to promote
24 through the projects that we are funding, a
25 representative of the Office of Procurement

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1 Services in the Department will give you a
2 brief presentation about the Department's
3 procurement process. And again, that's a very
4 important presentation to listen to and to pay
5 attention to. Then the Office of the
6 Solicitors, the Counsel for Appropriations and
7 Contracts will discuss what we expect when
8 multiple organizations apply for and
9 ultimately implement an award. And we'll
10 review for you those items or activities that
11 we cannot fund. It's what we usually refer to
12 as unallowable activities.

13 We will also give you a
14 presentation that will summarize some of the
15 key items in the SGA. There will be a
16 presentation also on the Government
17 Performance and Results Act and what we expect
18 in terms of performance, reporting, and issues
19 like that.

20 Then we will open the floor to
21 questions and we will ask you to be brief with
22 your questions. We want to give an
23 opportunity to as many people as possible, but
24 we want to hear from you. If you have
25 questions, this is the opportunity to clarify

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1 some of your questions. There will also be an
2 opportunity later on if you have questions to
3 write to the Grant Officer in the Office of
4 Procurement. After this meeting you will not
5 be allowed to contact my office directly to
6 ask any questions, so this is your one
7 opportunity to ask those questions directly.
8 But after this meeting, you will have to go
9 through the Office of Procurement Services if
10 you have any additional questions.

11 With that, I would like to thank
12 you again for coming and I'll ask Kevin to
13 join us for a presentation of the office.
14 Thank you.

15 MR. WILLCUTTS: Good morning. My
16 name is Kevin Willcutts and I'm the Deputy
17 Director of the Office of Child Labor, Forced
18 Labor, and Human Trafficking. I want to give
19 you a bit of an overview about our office and
20 some of the things we are trying to focus on
21 in the work we do.

22 First, you'll see here a picture of
23 a young boy in Ghana who is working in stone
24 crushing. What we look to address here is
25 combating the worst forms of child labor. And

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1 I want to say, as is noted in ILO Convention
2 182, we see this as something that needs to be
3 done as a matter of urgency.

4 But looking at the other side.
5 This is a picture that was drawn by a
6 thirteen-year-old boy named Raul. He lives in
7 rural El Salvador and participated in a DOL-
8 funded project to eliminate exploitive child
9 labor, and I think it helps to capture what
10 we're trying to do. In describing his photo,
11 he explains "this drawing shows that we, the
12 children, need adults to support us in our
13 education since education dignifies people and
14 we all expect to be somebody in life." So, I
15 think that if we look at -- those two pictures
16 we can see where we want to come from and
17 where we want children to arrive at. We're
18 looking for your applications to suggest to us
19 ways to make that happen.

20 You may have all seen this table
21 from the ILO Global Report on Child Labor. It
22 gives you a sense of the magnitude of the
23 problem we're dealing with. We're talking
24 about \$191 million children that are
25 economically active. And we know that -- when

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1 we talk about economically active, that's not
2 capturing the worst forms of child labor. If
3 we look at the different regions, we see that
4 Africa is the one region in which we've
5 actually had an increase in the number of
6 children working. But this is a global
7 problem.

8 Just quickly, this slide shows our
9 office and our bureau, just to give you a
10 sense of how we're organized. The Bureau of
11 International Labor Affairs recently went
12 through a reorganization and we're now
13 structured as three offices. For those of you
14 who haven't heard before, we used to be the
15 International Child Labor Program. We are
16 now, as we noted, the Office of Child Labor,
17 Forced Labor, and Human Trafficking.

18 A quick run-through: we began in
19 1993 based on a mandate to do research for the
20 Congress. We conducted research annually on
21 various topics. Then in 1995, we began
22 funding projects to address child labor. So,
23 in essence, we do see research as the starting
24 point for good programming. In 2001, we
25 launched our Child Labor Education Initiative,

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1 which is another important point. We see that
2 education is a necessary alternative that we
3 need to provide to children if they're going
4 to be withdrawn from child labor.

5 In 2006, the TVPRA, the Trafficking
6 Victims' Protection Reauthorization Act was
7 passed. This led to the change in our
8 office's name, just to give you a sense of why
9 that happened. We gained new responsibilities
10 related to forced labor and trafficking. And
11 although those are two topics we've been
12 involved in both in terms of research and
13 programming from the beginning of this office,
14 this was a new mandate from the Congress that
15 we will now be undertaking. And just to give
16 you a sense, we've had over \$595 million
17 appropriated for child labor technical
18 assistance programming since we began funding
19 programs.

20 Once again, our central goal is
21 addressing the worst forms of child labor,
22 forced labor, and human trafficking, and we
23 see three areas that we do this in, technical
24 assistance being one of them. Another is
25 research and I hope all of you saw the new

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1 pamphlet that we handed out. That includes an
2 electronic version of all of our reports. For
3 those of you who may have them on your shelf,
4 you know they're very heavy. This is a way
5 we're hoping to get the information out more
6 easily and we can update it more quickly. If
7 you need more copies -- we do want this
8 information, the Reports on child labor, to
9 get out to as many people as possible. So,
10 please, just let us know if you need copies.
11 Research, Policy and Awareness Raising --
12 Awareness raising is both domestically, about
13 international child labor, and
14 internationally.

15 I won't go through this slide, but
16 I'll let you see it for just a moment. This
17 gives you a sense of where we funded projects.

18 You'll notice up in the upper left-hand
19 corner, those are our projects domestically
20 that helped to raise awareness about
21 international child labor. But you'll see
22 that in Latin America, Africa and Asia, that
23 we've had roughly similar amounts of
24 contributions going to address the phenomenon
25 there, with Africa being the area with

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1 slightly more of the resources -- which as you
2 noted earlier, there's a reason for that. We
3 know that there's a great need in Africa.

4 So we ask, who are our customers?
5 We have a variety of customers we're trying to
6 serve. Of course, we're looking at children.

7 Those may be children in the worse forms of
8 child labor, or those might be children who
9 are at risk of getting involved in the worst
10 forms of child labor. But we're also looking
11 to help their parents and their families. We
12 know that there are different factors that
13 place a child at risk and by working with the
14 parents to raise awareness and to help them,
15 we can make child labor less likely. We're
16 looking at organizations who can have a role
17 in creating an environment that makes child
18 labor less likely.

19 Again, our customers' needs, basic
20 services, access to schooling and vocational
21 training, accountable governments who are
22 enacting and implementing laws in child labor,
23 and education. And we're looking at
24 organizations that have increased capacity to
25 address this phenomenon and to continue the

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1 work that we all begin here on the ground over
2 the long-term.

3 There are various factors that we
4 consider when we are targeting a country. Of
5 course, we are looking at the nature and
6 extent of exploitive child labor in the
7 country, but we're also looking to see where
8 we can fill gaps. That's something we've
9 tried to identify within the SGA, but we'll
10 also be looking for applicants to show us
11 where they see critical gaps to addressing the
12 problem of child labor and effective
13 strategies for helping working children to
14 access schooling and vocational training.

15 In terms of U.S. Government foreign
16 policy interests, there are various things
17 that we focus on. Those include issues such
18 as forced labor and human trafficking. We
19 also consider support for the labor side of
20 trade agreements to help governments to meet
21 those obligations that they've undertaken.
22 And we're looking for evidence of government
23 commitment. We see that as key to
24 sustainability. We seek to work with
25 governments, but not to replace what

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1 governments are doing. We want to increase
2 their capacity. We want to encourage their
3 long-term commitment to this issue, and
4 various factors: ratification of conventions,
5 national action plans, and stated government
6 commitments which can take a variety of forms.

7 And again, that feeds into sustainability
8 which we see as key.

9 I just want to quickly review with
10 you some of the steps we've already taken.
11 This is a very quick overview of what leads us
12 to the actual awards.

13 We have conducted meetings with
14 foreign ambassadors here in Washington, to
15 inform them about the competition for each of
16 these ten countries. We have also engaged the
17 governments and the key ministries, the key
18 line ministries, so that we can have an
19 exchange of letters of support. We are
20 seeking to ensure that all governments are
21 supportive of these programs before we make
22 any award. You've probably all seen the
23 Notice of Intent and now the SGA. The next
24 process, once we receive applications, will be
25 the review of proposals, and a key date -- we

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1 must award all of the funds by September 30th.

2 Finally, I just want to thank you
3 all for being here and I wish you the best of
4 luck.

5 Next, I would like to introduce
6 Troy Hargrove from our Office of Procurement
7 Services. As was noted earlier, he will be
8 giving a presentation regarding the process
9 which we've touched upon briefly.

10 MR. HARGROVE: Good morning. Once
11 again, my name is Troy Hargrove. I am
12 representing the Office of Procurement
13 Services. I am the Senior Grant Specialist
14 there. Today, I will be discussing the pre-
15 award process and the competitive grant
16 process. Right now I want to do an overview
17 of the competitive process. This is just a
18 quick overview of exactly what's going to be
19 happening.

20 The Program Office discusses
21 procurement needs with the Office of
22 Procurement Services, the Solicitation for
23 Grant Application, the SGA, is developed and
24 includes evaluation criteria. The SGA
25 availability is announced either through the

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1 Federal Register or Grants.gov. Applicants
2 are required to submit proposals by the due
3 date. The Evaluation Panel reviews proposals
4 and scores them according to the stated
5 evaluation criteria noted in the SGA.

6 The Evaluation Panel makes their
7 recommendations to the Office of Procurement
8 Services (OPS) Grant Officer. The cooperative
9 agreement is developed by OCFT and OPS, taking
10 into account the application's proposal and
11 panel report. Unsuccessful applicants are
12 notified by the Grant Officer and debriefed
13 upon request.

14 The next step I want to talk about
15 is Grants.gov. This is a new process that
16 we're embarking on. It gives you the steps
17 for actually applying on Grants.gov and for
18 submitting your applications electronically.
19 The steps consist of downloading a grant
20 application, completing the grant application
21 package, submitting the completed grant
22 application package, and the ability to track
23 the status of your submission online.

24 Hard copies: We are still accepting
25 hard copies. The initiative to support

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1 submissions being made electronically is
2 something we're still working on. So, we want
3 to emphasize that hard copies are still
4 accepted.

5 Time limits: In order to preserve
6 the fairness of everyone being able to submit
7 their applications. We want to make sure that
8 you submit those applications by the actual
9 deadline that we have stated in the SGA. If
10 an application actually comes in after that
11 date, it will not be accepted, reviewed or
12 considered.

13 Responsiveness: The responsiveness
14 of your grant application means that all
15 required documents are submitted based upon
16 the SGA.

17 Non-Responsiveness: This refers to
18 application errors and this is what will flag
19 us to say that an application is not
20 responsive.

21 The Technical Proposal: There is a
22 45-page max. You want to make sure that you
23 do not exceed that 45-page max. If it is over
24 that 45 pages, we will not read it.

25 Cost Proposals: You want to make

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1 sure that you have cost proposals inside of
2 your application.

3 Auto Reports: You want to make
4 sure that you submit the auto reports for the
5 primary applicant as well as associates,
6 and/or partners. Resumes for all key
7 personnel and signed letters of employment.

8 Partnership Agreement or
9 Agreements: DUNS numbers for primary
10 applicants, the associates. Everyone has to
11 have DUNS numbers.

12 Anything Submitted After the Due
13 Date and Applications Submitted in Languages
14 Other Than English: The Office of Procurement
15 Services will not translate any documents that
16 come in a language other than English.

17 Technical Review Panel: The
18 proposals that are determined to be responsive
19 to the SGA are forwarded to the technical
20 panel for review for compliance with the
21 technical criteria that is stated inside of
22 the SGA.

23 Rating and Ranking of the Proposal:
24 When the Evaluation Panel finishes they have
25 rated and ranked the proposals in accordance

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1 with how each proposal complies with the
2 requirements listed in the SGA.

3 Awarding: Once the Grant Officer
4 reviews and approves the panel's
5 recommendations, OPS preps the award package
6 and makes the award. All awards will be made
7 before September 30th.

8 In closing, the primary thing that
9 we want to emphasize is what makes a proposal
10 responsive? The key to making a proposal
11 responsive is making sure that you follow the
12 guidelines that we have stated inside of the
13 SGA.

14 All right? Good luck!

15 MR. WILLCUTTS: I would now like to
16 introduce Eileen Muirragui, who is our
17 Division Chief for the Latin America and the
18 Caribbean Division. She'll be giving a
19 presentation that summarizes what's in the
20 SGA. So, I think this should be very valuable
21 for all of you because as you may have
22 noticed, it's a very long document.

23 MS. MUIRRAGUI: I think it's 160-
24 some pages, double-spaced, but who's counting?
25 And that's just in hard copy, not in the

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1 Federal Register.

2 Well, good morning, everybody. As
3 Kevin introduced me, I am Eileen Muirragui,
4 the Division Chief for Latin America and the
5 Caribbean. As both Marcia and Kevin have
6 noted, we welcome you to the Department of
7 Labor.

8 It is good to see the number of
9 familiar faces here that have worked with us,
10 but there are also some new faces and
11 organizations. We are certainly glad to see
12 the newcomers. We welcome more actors to our
13 program. The children that we seek to help
14 and to benefit, which Kevin spoke to you
15 about, can not have enough friends. I think
16 some of you who know me have heard me say that
17 in the past. So, hopefully, some of you here
18 today will be able to win and make your
19 contributions and your innovations to this
20 very worthy endeavor.

21 Today, I am going to give you a
22 very brief overview of the content of the Ten
23 Country Solicitation for Grants Application.
24 And I also am going to speak very briefly
25 about the Solicitation for Grant Application

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1 for Carpets in three countries which is not
2 yet published. Because it's not yet
3 published, I can't give you as much detail,
4 but I will very briefly speak to you about it.

5 The responses to the Ten Country
6 SGA are due on July 25th, so that still is
7 going to give you some time to enjoy your
8 summer after you've worked very hard for the
9 next six weeks.

10 Before I actually get into the nuts
11 and bolts, I want to just give you a few words
12 of counsel and I also want to refer you to the
13 packet that you received. There are a number
14 of things in there that Marcia mentioned.
15 Some of them are the appendices to the SGA as
16 well as some supporting documents that will
17 assist you as you plow your way through the
18 SGA and as you write up your application.

19 First piece of counsel: read the
20 SGA very carefully. I have read it about two
21 or three times and I think I know it fairly
22 well but there are always nuances and
23 important things. So, I think it's really
24 quite critical that you read and you
25 understand it very carefully because, as Troy

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1 mentioned to you, you do not want to be --
2 after all of your hard work, the level of
3 effort that you put in, the resources, and how
4 expensive it is to do one of these, you do not
5 want to be deemed non-responsive for some
6 minor thing that you forgot. So please, read
7 the SGA very carefully and ensure you follow
8 it to the letter.

9 The second thing is, as Marcia
10 mentioned earlier, there is going to be an
11 opportunity for questions here today, so take
12 advantage of that. Our staff will be able to
13 respond to you directly. But after today, all
14 questions, as Marcia said, need to go through
15 the Office of Procurement Services, Lisa
16 Harvey specifically, as stated in the SGA. So
17 please do not ask our staff. We know some of
18 you very well, but you would be putting us in
19 a difficult position because we're going to
20 have to say no. We're not going to be able to
21 provide you any more information. It is not
22 fair to other applicants. We cannot provide
23 any additional information to anybody in
24 particular.

25 All right. So, let me speak

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1 specifically about the SGA. The SGA covers
2 ten countries and you see the amounts of award
3 for each of the countries. We reserve the
4 right to give one or more cooperative
5 agreements in each country. It really depends
6 on what comes in, but these are the amounts
7 that we have allocated, up to this amount of
8 money for the different countries. So,
9 Bolivia, Cambodia, Columbia, DRC, the
10 Dominican Republic, Indonesia, Morocco,
11 Philippines, Togo and Uganda. We have here
12 today our division chiefs from all of the
13 regions that will also be able to answer any
14 specific SGA questions that you might have
15 regarding these countries during the question
16 period later.

17 I wanted to give you just a very
18 brief overview of the structure of the SGA.
19 It is divided into these components: The
20 Executive Summary and the Funding Opportunity
21 Description which are required in all of our
22 solicitations. We provide some general
23 background and then we go into the scope of
24 work. The scope of work has general
25 requirements. The general requirements apply

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1 to all of the applications, all of the
2 projects, all the countries, and then there
3 will be country-specific requirements as well.

4 The SGA also has eligibility
5 information, application and submission
6 information. It provides you information on
7 how the application is reviewed. Troy spoke a
8 little about that as well. Award
9 administration information and a number of
10 attachments which you will find very useful in
11 completing the application. That includes
12 USDOL definitions of key terms which you
13 should carefully study and understand, the
14 technical proposal format, the definitions and
15 usual characteristics of sub-grants and
16 subcontracts.

17 Our representative from the
18 Solicitor's Office will also be able to
19 clarify some of those things if you have
20 questions, because of the authorities that we
21 do and do not have, and also, an Equal
22 Opportunity Survey. So that, in a nutshell,
23 is the structure of the 45-some page SGA.

24 I'm going to speak a little bit
25 about some of the sections that you need to

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1 take a careful look at. The first one of
2 those is the scope of work for the general
3 requirements. One of the first things that we
4 talk about there is the focus on action
5 research and data collection. We think this
6 is really very important because we want our
7 strategies to be facts-based, research-based.

8 So, among the things that we talk about in
9 there is that we want you to do a needs
10 assessment of the beneficiaries and the areas
11 where you are going to be working. And
12 specifically, that will also help you to
13 identify the criteria by which to select
14 beneficiaries. That's really very important.

15 We don't want you just to go out there and
16 say, simply, these are the target children
17 because we see them in the corner of the
18 street. We are looking for a specific
19 criteria that are related to need and all
20 sorts of other factors.

21 We also are encouraging small-scale
22 research on the worst forms of child labor
23 because this is an area where often not enough
24 is known. The projects can provide some very
25 useful information, additional information,

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1 that will contribute to our activities and
2 endeavors.

3 Another section of the general
4 requirements, scope of work, talks about
5 withdrawal and prevention from exploitive
6 child labor through direct educational
7 services and other project interventions. For
8 this, we want you to carefully look at the
9 definitions and consider what package of
10 services you may be providing to those that
11 you have identified as your direct
12 beneficiaries. We have had a lot of
13 discussion back-and-forth with our existing
14 grantees on this area, and certainly we will
15 work with you if you should win the award
16 also, to further specify. But it's very
17 important that you look very carefully at our
18 definitions of withdrawal and prevention, and
19 provision of direct educational services so
20 that you know what children could be counted
21 under our definitions for us to be able to
22 report under the Government Performance and
23 Results Act, about which we will talk a little
24 bit later.

25 We are also looking for clear and

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1 specific outcomes. And again, we're talking
2 here about the geographical areas of need, the
3 number of children to be withdrawn and
4 prevented, and the fact that we want the
5 children to be enrolled, retained and to
6 complete educational services. Though
7 retention and completion are not GPRA
8 indicators, they are common indicators that we
9 want all of the projects to report on.

10 We also encourage collaboration and
11 leveraging of resources. By collaboration, we
12 mean other actors that are working in the area
13 of child labor and education. It could
14 include other projects that we have funded or
15 that others are funding: collaboration with
16 the ILO, with USAID. The idea being that we
17 want to promote synergies and coordination
18 rather than have disparate efforts.

19 As far as leveraging of resources,
20 we are quite aware that the amounts that we
21 provide are not going to be sufficient given
22 the enormous need, and also some of the
23 constraints that we have on our funding, legal
24 constraints. So we certainly encourage
25 leveraging of resources and matching funds.

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1 We're going to talk about the nuances between
2 those two in a little bit. But if you can
3 bring resources in from other organizations in
4 a collaborative fashion, that will certainly
5 help the project and the beneficiaries. And
6 if you can bring matching funds as well, that
7 would be terrific.

8 Then finally, we require that
9 projects promote sustainability. There are
10 different definitions of sustainability. It's
11 a complex concept, but we provide a little bit
12 of background as to the types of
13 sustainability that you will be -- you should
14 be looking for in the project. We will be
15 asking also for a sustainability plan as part
16 of the application.

17 Within the country-specific
18 requirements, you will see background on the
19 country and the situation regarding child
20 labor in each country. You will also see
21 relevant policies, programs and projects in
22 those countries. We then give you a scope of
23 work for each of the countries and we will
24 provide you there, within that country-
25 specific scope of work, specific target

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1 groups, sectors, and the geographic focus that
2 we would like; what specific programs and
3 national policies we want you to link up to.
4 We talk about some implementing environment
5 cross-cutting themes that we want you to
6 incorporate in your strategies. Then we also
7 talk about project-specific strategies. We
8 ask you to please also read the country-
9 specific section so you will be, in your
10 application, addressing both the general
11 requirements and the country-specific
12 requirements.

13 Troy mentioned the application
14 evaluation and these are some of the criteria
15 that are listed in the SGA. These are the
16 points that we will be giving you for these
17 components: project design, budget cost
18 effectiveness, budget cost efficiency, 40
19 points. The sustainability plan which I
20 mentioned, 15; organizational capacity, 25;
21 key personnel, management plan and staffing,
22 20; additional direct beneficiaries, five
23 extra points and cost-sharing, five extra
24 points.

25 As I mentioned to you, the

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1 applications will be evaluated based on all of
2 the requirements in both the general and the
3 country-specifics' scopes of work. It should
4 be consistent with the definitions that we
5 provided in Appendix A.

6 Now, those of you that have bid in
7 previous years and that implement our
8 projects, you know very well that our SGAs
9 change every year. We add new topics. We add
10 clarifications. It's kind of like a new model
11 car. We're always seeking to improve it and
12 add new things to it. So, what I'm going to
13 do is, I'm going to clarify some of the new
14 things that we have in the '07 solicitation,
15 just so that it is clear to you what we mean
16 by some of these things.

17 We've put in five additional points
18 for matching funds. That means, in contrast
19 to leveraged resources, which you could get
20 from other organizations in the future -- they
21 commit themselves, but maybe they don't come
22 through or whatever. Matching funds are
23 something which you say you are going to do,
24 and that you are going to give and we're going
25 to hold you to do that. For matching funds,

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1 we are going to hold you accountable. It must
2 be included in the SF 424 and the SF 424a. We
3 will look for it to be reported in your
4 quarterly financial reports, your SF 269s.
5 You will be liable for meeting the full amount
6 during the life of the cooperative agreement.

7 As I said, leverage resources are
8 not the same thing as matching funds. Your
9 matching funds are subject to the same
10 restrictions and provisions as USDOL funds.
11 This is not in the Solicitation Grant
12 Application but as our lawyer will tell us, it
13 is a matter of appropriations law, so it is
14 subject to the same restrictions.

15 All right. Now, I want to clarify
16 a little bit on the direct beneficiaries
17 because these are the ones that we report to
18 Congress on for our GPRA. What we are asking
19 is that for every \$100,000.00 of project
20 funding, at least 172 children must be
21 targeted for withdrawal or prevention from
22 exploitive labor. Projects that target over
23 200 children for withdrawal or prevention for
24 \$100,000.00 of project funding may receive up
25 to five extra points.

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1 Another clarification on the direct
2 beneficiaries that is actually not on the
3 slide but is in the SGA, is the definition of
4 youth that you will see in some of the
5 country-specific sections. The DOL
6 definitions of youth which you will see in the
7 definition section, is not necessarily the
8 definition that host countries may use for
9 youth. So be sure that you are considering
10 the DOL definition which is children up to 18
11 years of age.

12 Within the SGA this year, we are
13 also encouraging commitments from businesses
14 and that is in the general requirements. We
15 give you some ideas that could include
16 scholarships, donations of goods, mentoring
17 and volunteering by employees, assistance in
18 awareness raising, and provisions of
19 internships for children or teachers to
20 improve their leadership and other skills. A
21 couple of the country-specific SGAs also have
22 more specific requirements regarding the
23 involvement of business. These include the
24 Dominican Republic and Indonesia. So, look
25 specifically at those countries or what those

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1 requirements are, but we're also encouraging
2 this over all -- in all of the countries.

3 As Troy mentioned, we want to
4 ensure that the DUNS number or the exemption
5 is included. The DUNS number should be
6 included for associations and all members of
7 the association. We want also to include the
8 NICRA form, the indirect cost rate form.

9 All right. I will speak very briefly
10 about the Carpets Research SGA because it
11 hasn't been published yet. We do intend to
12 award a cooperative agreement for research on
13 exploitive child and forced labor in the
14 carpet sector of Nepal, Pakistan and India.
15 The SGA will be published soon. Thank you.

16 I now want to introduce Dennis
17 Adelson from the Solicitor's Office, who will
18 be speaking to you about some legal
19 requirements and unallowable activities.

20 MR. ADELSON: I want to apologize
21 first for not having any fancy power point or
22 graphics. I'm not that skilled in computers.

23 I'm still learning how to type. Also in
24 part, it's because the notes that I use to
25 give these talks are always changing. In

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1 fact, as I was sitting here, I was updating
2 them with things that were suggested by the
3 other speakers. And in part because I don't
4 have all the answers to all the questions.
5 For example, I can't tell you why Scooter
6 Libby got three years in jail for telling a
7 lie and Paris Hilton gets three days in jail
8 for driving drunk. I just can't explain that.

9 But I can explain something about unallowable
10 costs.

11 We, the Department of Labor,
12 operate under a number of restrictions as to
13 what grantees can do with the funds that are
14 provided. These are appropriated monies.
15 I'll speak about grants or cooperative
16 agreements, essentially the same thing.
17 Sometimes I use different terminology. These
18 restrictions come from our appropriations law.

19 They may also come from Executive Orders or
20 from OMB rules, or sometimes just from
21 departmental policy as to what we want you to
22 do with our money.

23 Our purpose in outlining these
24 unallowable activities is to help you prepare
25 your applications better, to lead you into the

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1 kind of areas that will be allowed and will
2 fulfill the purposes of the cooperative
3 agreement. And it's also to help you avoid
4 situations where the Department or its
5 auditors may come in later and disallow a
6 particular cost or expenditure. In those
7 cases, very often we will ask you to return
8 the money. And that's a situation we don't
9 like to find ourselves in and you certainly
10 don't like to find yourself in. You know, the
11 money's been spent. It's hard to go find it
12 and give it back.

13 Among the major unallowable
14 activities, first and foremost is lobbying.
15 You are not permitted to use federal funds to
16 lobby. Lobbying means to try to influence
17 federal or state legislation in the United
18 States, or to influence elections through
19 contributions of money, through communications
20 to government officials, or even to the public
21 grassroots lobbying, or contributing to a
22 political party or a political action
23 committee. Those are all forbidden activities
24 that cannot be done with US funds. Your
25 organizations may, of course, engage in

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1 lobbying on your own, using your own money.
2 If you're going to do that, you have to be
3 extremely careful to make sure that you have
4 separate accounts so that you can document
5 your activities and show that they were using
6 other money, not our's.

7 Another unallowable activity is any
8 promotion of prostitution. Government policy
9 opposes prostitution as a harmful activity
10 that leads to trafficking in persons. So
11 grantees and your subcontractors may not use
12 our federal money to lobby for or promote the
13 legalization of prostitution as a regular form
14 or legitimate form of work. And I know in
15 some countries, prostitution is legal. It is
16 a proper form of work just like brick laying.

17 But you may not use our federal money to
18 promote that kind of activity simply because
19 that's our government policy.

20 Also, you have to be careful to
21 avoid the restrictions of the Executive Order
22 on dealing with terrorists. That's kind of a
23 difficult and a broad mandate to comply with.

24 The restriction is that you may not have any
25 -- not engage in any transactions with a

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1 person or an organization that is involved in
2 terrorism or associated with a terrorist
3 organization. Now to help you comply with
4 that, the Treasury Department maintains a list
5 of terrorist people and organizations and you
6 should refer to that Treasury Department list.

7 It's listed on their website. It's not all-
8 inclusive. It's not up-to-date all the time.

9 New names and organizations are always being
10 added. Organizations go by different names.
11 They change their names. So, you have to
12 watch that list.

13 In addition, you may be responsible
14 for dealing with people who are terrorists,
15 even if they're not on the list. So, you have
16 to check out the people that you're going to
17 be dealing with, especially in foreign
18 countries. Look behind them, check their bona
19 fides, see who the people are, and get a good
20 feeling for whether there may be any
21 involvement with terrorism in the background
22 of that organization.

23 Finally, one of the other --
24 probably the most difficult issue is that you
25 may not engage in inherently religious

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1 activities with federal money. As stated in
2 the SGA, the federal government is prohibited
3 from providing direct financial assistance to
4 inherently religious activities. These
5 generally consist of religious teaching,
6 prayer, purchasing religious materials, or
7 proselytizing or spreading a religion. You
8 and your subcontractors may engage in these
9 kinds of activities -- and we understand that
10 very often, some of your organizations are
11 religious in nature.

12 Some of the subcontractors you're
13 going to deal with are religious
14 organizations. So, they will have religious
15 components and engage in day-to-day religious
16 activities. They may do so, but the religious
17 activities they perform have to be separated
18 in time or physical space from the activities
19 performed under this grant. You cannot use
20 federal funding for anything that is of a
21 religious nature. Those grant funds should be
22 kept separate from any other funds that may be
23 devoted to a religious purpose.

24 And when we say time or space,
25 sometimes we're talking about a religious

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1 class that may be conducted in the morning and
2 a class under this grant may be conducted in
3 the afternoon. That's a separation in time.
4 So that we know, clearly, one is a religious
5 activity using non-federal money; one is a
6 grant activity using federal money. Or they
7 may be separated in space. You might have a
8 classroom in this building teaching religion,
9 and a class over here doing grant work,
10 teaching math or English, or local language or
11 whatever. So, if you maintain those
12 separations, you're probably going to be okay.

13 In addition, the beneficiaries
14 under your programs have to understand that
15 enrollment in any of the projects that you're
16 performing cannot be conditioned on their
17 participation in any particular religious
18 activity and their decisions not to
19 participate in religious activities cannot
20 affect their benefiting under these programs.

21 Finally, if you're going to be awarding any
22 subcontracts, you have to use neutral, non-
23 religious criteria when you select those
24 companies or organizations.

25 Sometimes these questions get a

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1 little difficult. We've had to disallow
2 certain expenses in the past for grantees that
3 have kind of blurred over-the-line and it's
4 easy to do that when you're dealing with any
5 kind of religious organization, or with host
6 country governments that may have educational
7 systems that are geared toward religious
8 teaching as a component of regular education.

9 So, we ask you to consult with us. You can
10 also check the DOL website for further
11 information at www.DOL.gov/CFBCI. I think
12 that stands for Center for Faith-Based and
13 Community Initiatives. That will provide
14 further information on this difficult subject.

15 There are some additional
16 unallowable uses of grant funds. In
17 particular, you cannot use our money to make
18 loans, whether through microcredit, revolving
19 funds, or loan guarantees. Our money is not
20 to be given away as cash. You may, however,
21 provide technical assistance and educational
22 services that may support programs and people
23 that are engaging in loan-type programs, but
24 our money cannot be used to make a loan.

25 Also, you can't give away cash. Our

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1 money is rather difficult to get and so we
2 want to make sure it goes in a focused and
3 direct way. You cannot give money directly to
4 beneficiaries. However, with Departmental
5 approval, you may furnish the participants in
6 your programs with items of support: things
7 like books, tuition, uniforms, supplies,
8 transportation that's incidental to getting
9 them into and through a program. Or sometimes
10 we authorize the use of vouchers -- vouchers
11 for transportation, vouchers for food,
12 vouchers for books where no direct money goes
13 to the hands of the beneficiaries so that it
14 cannot be misdirected.

15 The other big area, and this is the
16 cause of a lot of concern and heartburn, both
17 with grantees and with the Department, is the
18 question of sub-grants. As has been pointed
19 out, the Department of Labor does not have
20 authority to allow you to make sub-grants.
21 Some of you may have experience with the USAID
22 and I think they do have that authority. So,
23 it's very common that when you get a grant,
24 you may sub-grant a portion of it to some
25 other entity. We don't have that authority.

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1 We can't authorize you to do that.

2 We can permit, and it's perfectly
3 okay, to engage in subcontracting. Now, that
4 subcontracting is not a subterfuge or a
5 deviation or an excuse to avoid sub-granting
6 which is unallowable. But a subcontract is a
7 legitimate method by which you obtain needed
8 services in support of your grant. The
9 distinction -- very difficult to make and
10 we've indicated in the appendix to the SGA, we
11 put a chart that gives some characteristics of
12 what's a sub-grant and what's a subcontract
13 for your guidance.

14 Generally, a sub-grant is going to
15 consist of giving away part or all of your
16 grant funds or your grant work to another
17 organization that assumes tasks on your
18 behalf. You can't give your money to somebody
19 else and say, "here, go do a part of my work
20 or perform in this area of the country and I'm
21 carving out that piece for you." That's a
22 sub-grant.

23 A subcontract is different because
24 it's really a contractual arrangement where
25 you're paying for a service after the service

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1 has been provided, and you maintain kind of an
2 arm's length relationship with that
3 subcontractor and you're engaging them for
4 important services that you might not be able
5 to perform. They might be teaching services,
6 accounting services, transportation services.

7 All the kinds of things that you're going to
8 need to perform the grant other than the real
9 decision-making about the grant itself.

10 The distinctions come between sub-
11 grants and subcontracts -- generally would
12 come in the kinds of work and responsibility
13 that you're going to give to these other
14 organizations that help you. And to the way
15 they're paid, generally, a grantee gets money
16 up-front with the idea that "here's the money.

17 Go do good work." A subcontractor is told
18 "go do specific tasks and I will pay you when
19 it's done and only if it's done right."

20 Going into the grant, you may -- as
21 you plan what you're going to do, you may
22 realize that you can't do everything and
23 you're going to need help. You're going to
24 need other organizations to assist you in
25 doing pieces of work or in providing services.

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1 If you find yourself in a situation where you
2 really need other organizations to do major
3 parts of the work, that would normally be a
4 sub-grant and unallowable. However, if you
5 combine with them as partners, or associates,
6 as we call them -- and we have a definition in
7 the definition section of the SGA -- that's
8 okay. Because what you're doing is, you're
9 making them co-grantees. They become part of
10 the grant with you.

11 All your associates, including
12 yourself, must sign the grant agreement and
13 become responsible. We would say there's
14 "joint and several liability", which means
15 each of the associates is liable for
16 performance of the grant and for what happens
17 to the money. You must designate one of you
18 to be a lead grantee. That's the person or
19 organization with whom we will deal, the point
20 of contact. The money will flow to that
21 grantee. You can then have side agreements,
22 you might call them, with your associates or
23 partners describing what's going to happen to
24 that money. When we deal with the lead and we
25 put the money in that account, you can decide

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1 how does it gets distributed. You can have
2 side agreements delineating the work that each
3 associate is going to do.

4 In addition, if you want, to avoid
5 the onerous nature of liability for everybody
6 -- which means if one or two grantees or
7 associates go bankrupt or pull out, the one
8 remaining is left holding the bag -- you can
9 have side agreements among those associates if
10 you want that will describe the liability for
11 money or for performance just among them.
12 We're not party to that. That's a matter for
13 your concern, not for our's. As far as we're
14 concerned, you're all co-signatories. You are
15 all responsible for performing the grant. And
16 we know that's always a tough one and
17 sometimes we can offer some assistance in
18 helping you plan your associate agreements, or
19 deciding who's a sub-grantee, who's a
20 subcontractor.

21 Finally, a couple of disallowed
22 costs, kind of the dos and don'ts. In
23 planning your grants, be mindful of the fact
24 that construction is generally not allowed.
25 It requires prior approval by the Grant

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1 Officer and we generally limit it, if we allow
2 it at all, to ten percent of the project
3 budget. Similarly, purchasing land is
4 something that would require prior approval of
5 the Grant Officer.

6 We also do not allow giving of
7 gifts, souvenirs, personal items to anybody.
8 Those giveaway-type things are not a proper
9 use of the money. Same thing for food and
10 entertainments costs except in certain cases,
11 meals, transportation, rental and other
12 incidental items can be paid for as part of a
13 meeting or conference that is part of the
14 grant work. Basically, there we're saying
15 that parties and entertainment are not a
16 proper use, but legitimate meetings and
17 conferences are.

18 Also, we do not allow providing
19 funds to foreign governments, or paying
20 salaries or stipends to foreign government
21 officials, except that if you have need for a
22 foreign official to come to the project and do
23 some service or inspection, they can receive a
24 per diem -- basically, a reimbursement of
25 their costs of attending.

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1 Finally, costs for adults as direct
2 beneficiaries are not allowed, persons over
3 18. Because after all, the program is geared
4 toward children and in some cases, the
5 families of the children who may be receiving
6 benefits.

7 That's it.

8 MR. WILLCUTTS: I'd now like to
9 introduce Amy Ritualo who will speak on the
10 Government Performance and Results Act.

11 MS. RITUALO: I believe that I'm
12 the last speaker, so I'm going to try to be as
13 brief as possible because I'm sure that many
14 of you have burning questions which probably
15 aren't about GPRA, but maybe. I'm going to
16 just give a brief overview about the
17 Government Performance and Results Act which
18 we often call GPRA or G-P-R-A, and then talk
19 more specifically about OCFT's performance
20 measures, because each of the projects under
21 the Ten Country Solicitation will contribute
22 to these performance measures.

23 So what is GPRA? Essentially, the
24 government Performance and Results Act was
25 passed in 1993 to ensure public

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1 accountability. It was meant to indicate to
2 taxpayers that their money was being used
3 efficiently and effectively, and that it was
4 focused on programs that the public was
5 interested in and cared about. Ultimately,
6 the idea would be that Congress would use the
7 performance information to allocate budgets to
8 agencies.

9 In addition, the President's
10 Management Agenda which was established in
11 2002, identified five areas for improving
12 government performance, one of which was
13 budget and performance integration. This
14 provided further focus on results-based
15 management and performance-based budgeting.
16 Budget and performance integration means that
17 performance measures are integrated into
18 budget submissions and that funding would be
19 allocated based on a program's performance.

20 Just to give you an idea about
21 where OCFT's work fits within the broader
22 framework of the Department of Labor's goals
23 and objectives, OCFT's performance measures,
24 GPRA performance measures, are under
25 Strategic Goal II which is the competitive

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1 workforce. The idea is that the elimination
2 of child labor would improve a country's
3 social and economic development, making them
4 more competitive in a global economy. So, our
5 outcome goal is called 2K, which is to
6 contribute to the elimination of child labor
7 internationally.

8 We have two GPRA indicators that we
9 report on every year, that we've been
10 reporting on since at least 2001. Each year
11 we report this information in the Department
12 of Labor's Performance and Accountability
13 Report. The two indicators that we report are
14 the number of children prevented or withdrawn
15 from exploitive child labor and provided
16 education and/or training operations as a
17 result of US DOL-funded child labor
18 elimination projects. The second indicator is
19 the number of countries with increased
20 capacity to address child labor as a result of
21 US DOL-funded child labor elimination
22 projects.

23 I'm just going to go through a
24 couple more slides which give a little bit
25 more on the definitions of what we mean by

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1 withdrawn and prevented, and what we mean by
2 capacity building, and that these definitions
3 are consistent with those definitions that are
4 outlined in the SGA. I believe it's in
5 Appendix A.

6 So, what do we mean by "children
7 withdrawn"? This refers to those children
8 that were found to be working in exploitive
9 child labor and no longer work under such
10 conditions as a result of project
11 interventions. Here, we can identify two
12 separate groups of children: those that
13 should be completely withdrawn from work which
14 is based on ILO Convention 182, the Worst
15 Forms of Child Labor Convention in Parts A
16 through C. These include forms of work such
17 as commercial sexual exploitation, children
18 forced into armed conflicts, children in
19 illicit activities including drug trafficking
20 and drug production, children that are forced
21 into bonded labor, and children that are
22 victims of trafficking. These children should
23 be completely withdrawn, meaning that there is
24 no way that you can modify the work situation
25 for these forms of labor to make it okay for

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1 children to work in these areas.

2 The second category of children are
3 those that are involved in hazardous work
4 which is identified in Convention 182, as Part
5 D. And we also use Convention ILO --
6 International Labor Organization's Convention
7 138 on the Minimum Age Convention. In some
8 cases, the environment in which children work
9 under can make it hazardous and can make it
10 dangerous for them to work under. If those
11 conditions can be changed, and the child is of
12 legal working age, they can be considered
13 viable forms of work. So, for example, you
14 could work with a child to help them work less
15 in a safe type of work. Or you could help to
16 improve the safety conditions of a form of
17 work.

18 In addition, for children to be
19 considered withdrawn from work, they must be
20 benefiting -- or have benefited from direct
21 educational or training opportunities or
22 services. By this, we mean direct services
23 such as the provision of school fees,
24 textbooks, uniforms, transportation vouchers,
25 school meals, or other types of services that

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1 are given directly to the child or the family,
2 and they're given on behalf of the child, not
3 to the child.

4 What we don't include as direct
5 educational services would be the sort of
6 services where children may indirectly benefit
7 from them, such as awareness raising
8 activities, teacher training, chalkboards in
9 classrooms, or flip-charts or something like
10 that. While those can be carried out in
11 projects, they just couldn't be counted as a
12 direct educational service which would have a
13 direct link to the withdrawal of the child.

14 What do we mean by children
15 prevented? This refers to children not yet
16 working but who are considered to be at high
17 risk of engaging in exploitive child labor.
18 For example, siblings of ex-working children.

19 And a high risk situation refers to a set of
20 conditions or circumstances under which the
21 child lives or to which she or he is exposed.
22 A project could define this in many ways. It
23 could be related to the family environment.
24 Perhaps the child is an orphan and that makes
25 them more likely to go to work. Perhaps the

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1 child is living in a single parent family and
2 that makes them more likely to work. Or
3 perhaps they're living in an environment where
4 most of the children work, or there's a high
5 number of children who work in that community.

6 Perhaps if we're talking about children in
7 mining, their parents work in mining and so
8 they're more likely to go with their parents
9 to work in the mines. Again, each child, in
10 the case of prevention, should have benefited
11 or be benefiting from a direct education
12 service, as I mentioned before.

13 In addition, we expect that
14 projects monitor carefully the educational and
15 work status of children. That the projects
16 develop some plan to monitor their work and
17 educational status on a regular basis to
18 ensure that that child remains out of work, or
19 that that child is not working during off
20 school hours. It's not acceptable to consider
21 -- it's not acceptable to think that just
22 because you're providing education to the
23 children that they're not going to work. They
24 could work before school. They could work
25 after school. They could go to school during

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1 the day and work in prostitution at night.
2 That wouldn't be acceptable.

3 This is just a graphic which is
4 based on the International Labor
5 Organization's publication, their First Global
6 Report in 2002, which basically describes the
7 -- how we can define exploitive child labor
8 based on the two main ILO conventions,
9 Convention 182 and 138. It shows the various
10 types of work and the age at which children
11 work. So what we can see just generally is
12 that children in the unconditional worse forms
13 of child labor -- that's children in
14 trafficking, forced and bonded labor,
15 commercial sexual exploitation, illicit
16 activities -- they should be completely
17 withdrawn from work. Children in hazardous
18 work, they must be withdrawn from work that
19 makes it hazardous or that conditions can be
20 changed so that they're not working in
21 hazardous situations. That applies to all
22 children under the age of 18.

23 The second category shows that
24 children -- there could be forms of work, non-
25 hazardous work, which -- that a child could

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1 work in it so long as they're above a minimum
2 age for work. Here we look at the conventions
3 and again, we look at the national
4 legislation. So, each country should be
5 working within the confines of the conventions
6 and also the national legislation that's set
7 out in the country in which you are working.
8 Those children that are working under the age
9 at which -- the minimum age of work, they
10 should also be withdrawn from work.

11 Convention 138 allows children to
12 work in light work under certain
13 circumstances, and that the age of working
14 children should not be less than 12. That
15 varies by country so ideally, children would
16 be -- not be working 12 and 13 years and
17 countries should be working to increase the
18 age at which children work. But they do allow
19 it for countries based on their development
20 and their, sort of, economic and social
21 development structure. So, in this case, the
22 minimum age at which children can work in
23 light work is 12, but again, that varies by
24 country. So, you can see these footnotes by
25 the age range. So, children who are below the

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1 age of 12, if that's what the country has
2 defined in their legislation, should not be
3 working and withdrawn from work as well. But
4 that there is this flexibility that children
5 may work in light work so long as it doesn't
6 interfere with their ability to go to school
7 or to benefit from the instruction received.

8 The second indicator that we
9 measure across all of our projects is
10 countries with increased capacity. By this,
11 we mean one of the following: the adaptation
12 of a legal framework to the international
13 standards. This could be that the country
14 adopts a hazardous work list as part of their
15 obligations under Convention 182. It could be
16 that they sign a multi-lateral corporation
17 agreement to combat some form of child labor.

18 That they ratify one of the conventions, that
19 they adopt some legislation combating child
20 labor.

21 The second criteria would be the
22 formulation of a specific policy or program at
23 the national, regional, or sectoral level
24 within a country dealing with the worst forms
25 of child labor. This could be a national plan

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1 of action. It could be sub-programs that have
2 been developed on child labor, or a certain
3 sector of child labor.

4 The third criteria is the inclusion
5 of child labor concerns in relevant
6 development, social, and anti-poverty policies
7 and programs. This could include the
8 integration of child labor as a specific
9 target group in a country's millennium
10 development goals, their poverty reduction
11 strategy papers, or their education for all
12 plans.

13 The last would be the establishment
14 of a child labor monitoring mechanism. This
15 could happen at the community level, the
16 regional level, the national level. It could
17 be a pilot plan, the implementation of a pilot
18 child labor monitoring mechanism. And
19 that's it.

20 MS. MURPHY: Good morning. My name
21 is Michal Murphy and I work on the Africa team
22 within the Office of Child Labor, Forced Labor
23 and Human Trafficking.

24 I think this is the part of this
25 morning's meeting that you'll find most

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1 helpful to you as you prepare your
2 applications. I know that we've presented a
3 lot of information and you've been very
4 attentive. We really appreciate that. But
5 now it is really your time to ask your
6 questions of us. This is the only time, as
7 Marcia noted, that you'll have the benefit of
8 directing your questions towards program
9 staff. So, you'll have the benefit of
10 everyone that's presented here this morning,
11 as well as our division chiefs within the
12 office.

13 So at this time, we'll have --
14 Patrick and Angie will be helping you at the
15 microphones. If you would like to just come
16 up to each microphone, identify yourself, the
17 organization that you're from, and your
18 question. We just would ask that you would
19 speak slowly and clearly into the microphones
20 so our transcriber will be able to hear
21 everything that you're saying because this
22 meeting will be transcribed. Our transcription
23 will be coming on the internet as well, on our
24 website. So, we want to make sure that
25 everyone, besides just applicants that are

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1 here today, have the benefit of this question
2 and answer session.

3 MS. EUGENIO: Actually, if I can
4 ask Dennis and Troy, if you don't mind coming
5 up here so you will be closer to a microphone?

6 I imagine a lot of the questions will be
7 about legal questions and procurement
8 questions.

9 MS. BRUCH: Good morning. This is
10 Anabella Bruch. I'm from Partners of the
11 Americas. I do have a question about -- legal
12 question.

13 In this slide, it was mentioned
14 that leveraged resources or, actually,
15 matching funds are subject to the same
16 restrictions that USDOL funds. If we were
17 interested or able to provide microcredit
18 funding from other resources, could we count
19 those as a match?

20 MR. ADELSON: My face is twisting
21 up into a knot. That's a very tough one.
22 Generally when we think of matching funds,
23 we're thinking of money being pledged by
24 another organization. You know, when you say
25 "I will get \$100,000.00 contribution from this

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1 other organization and I will add it to the
2 pot and be able to do more with it," those
3 funds become part of the promise, the
4 obligation and part of the grant. So they
5 will be subject to the same restrictions as
6 federal money and so you cannot use them for
7 unallowed activities.

8 If you're saying that another
9 organization may be putting loans on the table
10 and they will be working with you to provide
11 micro loans to someone --

12 MS. BRUCH: Or that we would if we
13 have our own microcredit funding.

14 MR. ADELSON: Okay, you as the
15 grantee, would not be able to engage in any
16 kind of lending with federal funds.

17 MS. BRUCH: It would be our own
18 funds from somewhere else that we already
19 have.

20 MR. ADELSON: Okay. If it's your
21 own funds or other funds and you intend to
22 make microcredits a part of this program, they
23 would then be subject to our rules and we
24 would not allow that. If you want to engage
25 in microcredits or any other kind of lending

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1 on your own and apart from the grant, and just
2 do it out of the goodness of your heart,
3 that's okay. That's outside the grant and it
4 would not be subject to any prohibitions. But
5 once you bring it within the promise of what
6 you will do under this grant, it becomes an
7 unallowed activity.

8 MS. BRUCH: So the answer would be
9 no.

10 MR. ADELSON: I think so.

11 MS. BRUCH: They would not count as
12 a match even though it has been recognized
13 that microcredit is an important aspect.

14 MR. ADELSON: They're an excellent
15 technique, you know, a fantastic tool, but
16 they're not one that we can authorize at the
17 Department of Labor.

18 MS. BRUCH: Are we able to leverage
19 it from another organization?

20 MR. ADELSON: Well, in leveraging
21 if -- the key element is whether you're
22 promising to do it under the grant. We've
23 talked about leveraging resources in a more
24 informal way where you say, "I may be talking
25 to some other folks who may be doing these

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1 ancillary activities and that will help in the
2 performance of this grant, but I'm not
3 committing them and me to do it. It's not
4 part of my promise. It's not part of my
5 obligation. It's just something I mentioned
6 in passing." That's okay. But once you bring
7 it in as a promise and you say "this other
8 organization will be providing it," I think it
9 would be an unallowed use of a matching fund
10 under this grant.

11 MR. TREW: Just clarifying, that
12 was my first question too. So, if --

13 MS. MURPHY: I'm sorry. Can you
14 just also state your name and organization?

15 MR. TREW: I'm John Trew from Care
16 International.

17 MS. MURPHY: Okay.

18 MR. TREW: So, as a component of a
19 holistic process, we shouldn't even mention
20 that if we plan to do that with funds from our
21 own organization or those that we bring to the
22 table in our application? And secondly, you
23 also mentioned that funding could not be
24 allowed for cost of adult beneficiary
25 services. Does this mean skills training or

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1 any kind of services we're providing to
2 parents or teachers as well as a component of
3 this holistic process? So, only funds for
4 children, is that what you're specifically
5 saying?

6 MR. ADELSON: Yes. As to the first
7 question, I think it probably is better if you
8 don't mention it in the grant application in
9 terms of the leveraging of something that may
10 be disallowed simply because it's going to
11 confuse our evaluation process. If some
12 people mention it and some people don't, there
13 will always be the question of whether it
14 figured into whether they got the grant and
15 you didn't. Since it's not allowed, it should
16 really not be part of the consideration.

17 The question about costs being
18 directed toward adult people, I think we've
19 determined in the past that if the idea is to
20 provide an ultimate benefit to the children,
21 that benefit may flow through their adult
22 parents or teachers. Our prohibition really
23 is against giving money to 19-year-olds to
24 prevent them from going into these activities.

25 MR. TREW: Thank you.

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1 MS. MARTINEZ: Good morning. My
2 name is Rachelle Martinez. I'm with OIC
3 International. This question is for Mr.
4 Willcutts.

5 This is more of a project design
6 question. You went over briefly -- you talked
7 about filling in the gaps and sustainability.

8 Could you just go over that again?

9 MR. WILLCUTTS: Sure, and this also
10 feeds off of a number of the other comments
11 that were made by Marcia and Eileen. Given
12 the resources that we have and the magnitude
13 of the problem we're trying to address, we
14 want to avoid focusing resources where there
15 are already efforts that exist. What we're
16 trying to see is, since our goal is to
17 withdraw and prevent children from child
18 labor, and also to make sure that education is
19 an opportunity they can access, we want to
20 look for where there are gaps, currently.
21 Where a project can be most effective, and
22 where you could use our resources to the best
23 effect.

24 Does that -- yes, it's just a
25 matter of terms and this is...

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1 MS. MARTINEZ: -- be avoiding duplicating
2 efforts?

3 MR. WILLCUTTS: Avoiding
4 duplication and showing where the priority
5 areas should be. If -- you know, if an
6 applicant is very knowledgeable about the
7 situation in the country what we're trying to
8 address and can show that a certain area is a
9 major gap, then that's what we want to hear
10 about. We want to be directing our resources
11 to be most effective.

12 MS. LEVITUS: Hi, I'm Arianna
13 Levitus with the American Refugee Committee.
14 Just a quick follow-up to the adult
15 beneficiary question, and then a separate
16 question.

17 Country-specific for Uganda, many
18 formerly abducted people are now over the age
19 of 18, so would -- we wouldn't be able to use
20 Department of Labor funds for vocational
21 training or education for those people?

22 MS. EUGENIO: No. No.

23 MS. LEVITUS: Okay.

24 MS. EUGENIO: So, you have to -- it
25 has to be under 18, children under 18.

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1 MS. LEVITUS: Okay. And then about
2 subcontracts. It mentions that if you choose
3 to use a subcontractor after you've been
4 awarded the grant, you have to go through a
5 formal and competitive bidding process. Can
6 you identify a subcontractee prior to
7 submitting the proposal? If so, are there
8 regulations on choosing that partner?

9 MR. ADELSON: I think there are. I
10 think the regulations at 29 CFR Part 95, which
11 are the general regulations for Department of
12 Labor that govern grants, has a section on
13 procurement. The procurement is by the
14 grantee of services and goods and
15 subcontracted things. There's a description
16 of the kinds of activities you should engage
17 in to find a subcontractor. Basically, we
18 encourage the use of competition rather than a
19 "pick your friends" approach to contracting
20 because we want federal money to be put to the
21 most efficient use.

22 MS. MARTINEZ: Thank you.

23 MR. LEVIN: Good morning. I'm Marc
24 Levin from Free the Slaves. Three really
25 short questions, I promise.

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1 Will there be a separate meeting
2 for the SGA on carpets or staff access once
3 it's released?

4 MS. EUGENIO: No, I'm sorry about
5 that, but we will publish the SGA soon. If
6 you have specific comments or questions about
7 the SGA and need clarification, then we will
8 encourage you to contact Lisa Harvey in the
9 Procurement Office and ask your question.
10 Then we'll answer through that process.

11 MR. LEVIN: Okay, thanks.

12 My second question, is the list of
13 funded projects represent everybody who is now
14 receiving DOL funds for -- in the bureau?

15 MS. EUGENIO: Yes.

16 MR. LEVIN: Then you also mentioned
17 there would be country -- are there bureau
18 country people here today, country desk
19 people?

20 MS. EUGENIO: I'm sorry. When you
21 said the list of projects, that's a list of
22 projects only on child labor --

23 MR. LEVIN: Yes.

24 MS. EUGENIO: -- for our office,
25 yes.

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1 MR. LEVIN: Right, that's right.

2 MS. EUGENIO: Yes, there are
3 several people from our office that represent
4 the Division Chiefs for the Regional Teams.

5 MR. LEVIN: Yes, I was -- I don't
6 know if we would have a chance to get their
7 names or identify themselves because my
8 question actually is not about -- wouldn't be
9 asking a special question about this grant,
10 but about research we're looking to do in the
11 mining area of Congo and also about slavery in
12 the Dominican Republic. So, I just wanted to
13 have a chance to get a name or two while I was
14 here.

15 MS. EUGENIO: Well, actually,
16 that's great. I'll ask the Division Chiefs to
17 stand up and introduce themselves.

18 Maybe, Rachel, can we start with
19 you?

20 MR. LEVIN: Thanks.

21 MS. RIGBY: Can you all hear me?

22 My name is Rachel Rigby. I'm the
23 Acting Division Chief for the Asia, Europe,
24 Middle East and North Africa team. The
25 Division Chief is Sharon Heller and she's out

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1 on maternity leave right now. She'll be back
2 in about the middle of July.

3 MS. RASA: Hi, I'm Tanya Rasa. I'm
4 the Africa Division Chief. If you're
5 interested in the Congo, Patrick White is
6 handling the microphone and he can help you
7 with that.

8 MS. MUIRRAGUI: I'm Eileen
9 Muirragui, the Division Chief for Latin
10 America and the Caribbean. And I can answer
11 whatever you'd like on the Dominican Republic.

12 MS. CASTRO: I'm Charita Castro,
13 the Division Chief for Operations and Research
14 and will be overseeing the carpet SGA grant
15 for South Asia, along with the Asia, Europe
16 Mena Group.

17 MS. SEACOR: Good morning. I'm
18 Jessica Seacor from the ILO.

19 Just a question on whether you'll
20 be accepting partial bids for any of the
21 countries?

22 MS. EUGENIO: Yes.

23 MS. SEACOR: Okay. And did you
24 also encourage partnership ahead of time for
25 submitting a full application? Or if an

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1 organization were to submit a partial bid,
2 would you then match up for the remaining part
3 of the funds that you're looking for in that
4 country?

5 MR. WILLCUTTS: In terms of that,
6 for each of the countries, there's a certain
7 amount of money that's available up to that
8 amount. We will review all the applications
9 and it's possible that we could select more
10 than one, depending on the funding levels.
11 But it's not determined in terms of two
12 applicants, that these match up. Each
13 application is reviewed and considered
14 independently.

15 MS. SEACOR: Okay, great. Thank
16 you.

17 MS. STERN: Hi, I'm Lily Stern with
18 the International Rescue Committee. I think
19 at least Patrick knows the question that I'm
20 going to ask. It's, again, a clarification on
21 the adult beneficiaries issue.

22 We have been given some verbal
23 guidance that young people who have been
24 enrolled when they were under the age of 18,
25 can be continued to be supported, for example,

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1 through follow-up services, for vocational
2 trainees who may have enrolled at 16 or 17 but
3 during the life of the project became 18 or
4 over, that we could use resources from the
5 project to support those children or youth.
6 So, I'd just like to get clarification for
7 everybody on that, if you can?

8 MS. EUGENIO: Dennis, my
9 understanding is that that is allowable, yes.

10 That if --

11 MR. ADELSON: That's more of a
12 policy call, I think.

13 MS. EUGENIO: If the child is
14 enrolled at the age of 16 and is completing
15 the program and the project is actually still
16 ongoing and you want to have followup
17 activities with that child, then that's -- I
18 mean, after the age of 18, then that is
19 allowable and we will consider that, you know.

20 And that brings up a good point
21 which is, you know, in some cases, this idea
22 of the lengths of services that are being
23 provided to children. Our preference will be
24 that children are part of the project for as
25 long as possible, or as long as the project is

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1 actually active. So, we will actually
2 encourage that.

3 MS. STERN: Thank you.

4 MR. KLEIN: Russ Klein with
5 International Relief and Development. A
6 question on NICRA. What are your regulations
7 or limits on charging to NICRA? Do you use
8 USAID standards or anything to the sort?

9 MR. HARGROVE: I would need to get
10 back with you on that question. That would be
11 a question for Victor Lopez in the Office of
12 Procurement Services, Cost Determination
13 Division.

14 MR. KLEIN: Okay, thank you.

15 MR. WILLCUTTS: But I would note,
16 the cognizant agency with US Government
17 establishes the NICRA. That's the NICRA that
18 you have established. So, if you have a
19 different agency that's the cognizant agency,
20 we don't establish a separate NICRA.

21 MR. KLEIN: Okay, thank you.

22 MS. GIANNONI: Hi, Tonya Giannoni
23 with DevTech. I have three questions as well.

24 Is it okay -- if you have an
25 associate, is it okay for them to subcontract?

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1 And if you have a subcontractor, is it okay
2 for the subcontractor to subcontract? And
3 then on a programmatic, in terms of research
4 with it being a new emphasis, when you say
5 "minor", can you give me some thresholds and
6 sort of percentage of a program that you want
7 those funds for?

8 MS. EUGENIO: I'm sorry. Can you
9 repeat the last question?

10 MS. GIANNONI: Well, in the
11 research, with it being a new area and there
12 were some comments about it being, you know,
13 lower level or minor level. I mean, some sort
14 of notion of the percentage of it of the
15 program -- of the emphasis of it on the
16 program. Or does it depend on the country
17 because it's a general requirement and also a
18 specific requirement.

19 MS. EUGENIO: Let me ask, actually
20 -- I'll ask Kevin and perhaps Eileen to
21 comment on this as well. But I'll answer the
22 second question first and then I'll maybe ask
23 Dennis if he can answer the first question.

24 Research and data collection is not
25 necessarily a new component of the projects.

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1 I mean, in, I would say, all of our projects
2 there has always been a research and data
3 collection component. I think the idea this
4 year is that we want to make sure that needs
5 assessments are conducted and that you have
6 sufficient data, baseline data, to identify
7 your target population and also to be able to
8 measure and track their progress. And at the
9 end of the project, to be able to measure
10 impact.

11 So, I couldn't necessarily give you
12 a percentage and say, well, you know, you
13 should be using 20 percent of your budget on
14 research and that kind of stuff.

15 MS. GIANNONI: Primarily related to
16 the selection and the ongoing monitoring of it
17 --

18 MS. EUGENIO: Yes, it is more of
19 the nature of you need good data in order to
20 identify your target population, and you will
21 need to continue to collect good data in order
22 to be able to measure their progress. At the
23 end of the day, we need that data in order to
24 be able to measure the overall impact of the
25 project. So, it is a continuous process.

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1 MR. WILLCUTTS: And also, really,
2 the other aspects. As Marcia said, research
3 is a key building block. We're also noting
4 that there can be gaps in research in a
5 country, particularly on the worst forms of
6 child labor, and your project may propose to
7 address that gap in information. As Marcia
8 said, we wouldn't say if you have a component
9 that's focusing on collection of data on the
10 worse forms to fill a gap, we wouldn't say
11 there's a certain percentage. That would be
12 up to you in terms of applying.

13 Of course, we would remind you that
14 the -- project must reach at least 172
15 children per \$100,000.00. You'll note there,
16 we left it up to you all to do the math for
17 each one of the projects. But you do need to
18 reach that threshold, so that's one thing
19 that's necessary. Otherwise, it's up to you
20 to submit what you see as the best proposal.

21 MS. EUGENIO: Dennis --

22 MR. ADELSON: Yes, on the other --

23 MS. MUIRRAGUI: If I could just add
24 one additional thing to your question. In the
25 SGA, in the component under Action, Research

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1 and Data Collection, we actually talk
2 specifically. The small-scale research
3 regarding the unconditional worse forms of
4 child labor which is those three categories
5 under 182, the first three categories that Amy
6 talked about. That's very important. Also in
7 the SGA, you'll note the importance of data or
8 research that indicates correlations between
9 educational performance and child labor.

10 So, I think we're giving you some
11 guidance in the SGA's to what there is.

12 MS. EUGENIO: Sorry, Eileen, what
13 page is that that you're reading from?

14 MS. MUIRRAGUI: In the Federal
15 Register, it's page 32871 and that is in the
16 first and the second columns. The end of the
17 first column and the mid part of the second
18 column.

19 MS. EUGENIO: Dennis?

20 MR. ADELSON: Yes. As to your
21 first questions, it's okay for any of the
22 associates to engage in a subcontract. It
23 doesn't have to be a joint subcontract. Each
24 of the associates is kind of a co-grantee.
25 Each one of them can award whatever

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1 subcontracts are necessary. And you can also
2 have what we would call second or lower tier
3 subcontractors. A subcontractor can make a
4 subcontract. The thing to watch out for is
5 that in any subcontract, you want to flow down
6 the requirements and the prohibitions from
7 this solicitation. The same obligations that
8 you're under must flow down to any subs at
9 whatever level they may be operating because
10 they're all using federal money.

11 MS. ARRINGTON: Thank you. My name
12 is Brenda Arrington. I'm with the Academy for
13 Educational Development.

14 My question is regarding the Uganda
15 project. Is it intended to be a follow-on to
16 the Oracle Project, or is it a different,
17 altogether new project that would continue
18 some of the aspects of Oracle?

19 MR. WILLCUTTS: I would direct you
20 to the SGA to see what's there again. But as
21 in all of our projects, we're looking not to
22 duplicate and to build off of whatever efforts
23 have taken place in the country. So in the
24 case that we've had a project, we certainly
25 want new projects to build upon that. Or if

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1 there are efforts by other groups that weren't
2 funded by us, we're looking for applications
3 to make an assessment of what the situation is
4 and how we can best use these resources.

5 So, I hope that clarifies a bit.
6 If there's a project in a region, we don't
7 want to duplicate efforts. We want to build
8 upon what's been established.

9 MR. NGUYEN: My name is Quy Nguyen
10 from OIC International. I have just three
11 very short questions.

12 Question number one is, did you
13 have any guidelines or preferences regarding
14 the use -- utilization of ex-patriots to lead
15 programs in these countries?

16 MS. EUGENIO: You mean for key
17 personnel --

18 MR. NGUYEN: Yes.

19 MS. EUGENIO: -- in terms of
20 implementing?

21 Well, we'd certainly leave that up
22 to the grantee to determine who the best
23 qualified individuals are for implementing or
24 helping to implement the project. However,
25 one of the ideas of this project is to build

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1 local capacity. One way to do that is to hire
2 local experts to assist you in the
3 implementation of those projects.

4 So, I mean, we can't tell you that,
5 you know, we want you to hire a local person.

6 But if, in looking at how you're going to
7 build your project and design your project and
8 at the end of the day the outcome that you
9 want to have, definitely building the local
10 capacity is something that we want you to
11 focus on as well.

12 MR. NGUYEN: I take it to mean that
13 ex-patriots or not, so long as the end result
14 is the capacity building.

15 MS. EUGENIO: Well, again, the
16 answer is that we can't tell you who to select
17 because we want you to select the best
18 qualified person for the position. If that
19 person happens to be an ex-patriot, then
20 that's fine. But again, one of the things
21 that we would like everyone -- encourage
22 everyone to think about is that there are a
23 lot of qualified individuals in countries that
24 have expertise that you may need. And also,
25 the costs associated with key personnel that

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1 are not local is really high.

2 I think Kevin may have some
3 additional information from the SGA.

4 MR. WILLCUTTS: Right. On this
5 topic, I'd just point you to page 32902. It's
6 the second column on key personnel and it
7 states: "In order to promote and increase
8 national and local capacity, USDOL encourages
9 the hiring of qualified national experts.
10 USDOL also encourages applicants to consider
11 staffing strategies that aim to develop a
12 capacity of national staff over the course of
13 the project as part of a contribution to the
14 development of national capacity for combating
15 exploitive child labor. Preference may be
16 given to applicants who propose such
17 strategies which are determined to be
18 effective."

19 But as Marcia said, it is up to
20 each applicant to determine what is the most
21 effective staffing strategy for your project.

22 MS. EUGENIO: And remember that
23 we're going to be looking at the resumes of
24 the key personnel. So, if the person that you
25 are proposing - if you propose a local person

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1 and that person is not qualified for the
2 position, then we will take that into
3 consideration as well.

4 MR. NGUYEN: Thank you very much
5 for that. Very clear, very clear answers.

6 My last question -- my
7 organization. We're based in the United
8 States. We have a DUNS number. Unless I'm
9 mistaken, we have several affiliations in
10 different countries and they are local and we
11 might call them associates and we may work
12 with them. But I'm not sure if they have a
13 DUNS number.

14 MR. HARGROVE: They would -- they'd
15 need to get a DUNS number. Every one that
16 would be affiliated with you will need a DUNS
17 number.

18 MR. NGUYEN: Including the -- I
19 will call that local in-country. Like someone
20 in Cambodia, they have to apply for a DUNS
21 number, correct?

22 MR. HARGROVE: Correct.

23 MR. WILLCUTTS: If they're an
24 associate.

25 MR. HARGROVE: Yes, if they are

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1 going to be your associate.

2 MS. EUGENIO: The only difference
3 would be with a contractor. A contractor, a
4 foreign contractor, wouldn't need a DUNS
5 number.

6 MR. HARGROVE: Right, a DUNS
7 number. Right.

8 MR. NGUYEN: In my association,
9 people who are part of the project design to
10 carry out, they are associates?

11 MR. WILLCUTTS: Right.

12 MR. NGUYEN: Thank you so much.

13 MR. DOGGETT: I am Tony Doggett
14 with American Institutes for Research.

15 I do recall that last year there
16 was a lot of discussion about subcontracts
17 versus sub-grants. I just wonder if you could
18 share with us a little bit what your
19 experience has been, how it has panned out,
20 and whether it has met your requirements?

21 MS. EUGENIO: Yes, I do remember
22 the discussions. This is one of those areas
23 where Dennis actually mentioned before, that
24 this is a learning process for all of us. You
25 know, that we are constantly reviewing what

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1 we're doing. We want to be in compliance with
2 federal regulations and that's our objective.

3 So far, I think there has been a
4 learning curve. I think that we've provided
5 guidance -- we've spent a lot of time
6 providing guidance to grantees on this issue.

7 I know that questions have come up
8 concerning, "Would this be considered a sub-
9 grant or a subcontract?" Those questions are
10 referred to the Solicitor's Office for review.

11 Some grantees have taken advantage of that
12 before they signed the agreement with the
13 organization. Also through our audit process,
14 we've provided some technical assistance to
15 grantees on this particular issue as well.

16 So, I mean, I think that -- are we
17 there already? Probably not. I think we've
18 definitely improved though in the last year,
19 and I -- we're hoping that we will continue to
20 provide information and guidance, and that
21 that will clarify -- further clarify the
22 situation.

23 MS. PANDO-BEHNKE: Hello. My name
24 is Barbara Pando-Behnke and I'm with Catholic
25 Relief Services. I have a couple of

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1 procurement-type questions and then a country-
2 specific one.

3 One, just going back to the
4 question about cost share. So, if our cost
5 share -- if a cost share is subject to the
6 same restrictions as DOL funds, would they be
7 required to follow Fly-and-Buy America, and
8 also be subject to any requirements on
9 restricted goods? That's the first question.

10 The second -- is that clear?

11 MR. WILLCUTTS: I'm sorry, for
12 restricted goods, you're referring to?

13 MS. PANDO-BEHNKE: And again, this
14 might be USAID-specific, so it might not
15 apply. But there are certain restricted goods
16 that are applicable to federal funds that are
17 not subject, usually, to cost share. So, I
18 was just wondering about that, and it might
19 not apply because this is USDOL.

20 MS. EUGENIO: Well we may have to
21 follow-up with you.

22 MS. PANDO-BEHNKE: Okay. Okay.

23 MS. EUGENIO: -- because there are
24 very few -- I mean if we're talking about
25 federal regulations, then if it applies to

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1 USAID, it probably applies to the Department
2 of Labor. And one word of caution. When
3 you're not clear about something and you just
4 want -- it's better to seek clarification
5 beforehand because if, for example, you do
6 spend money on something that is prohibited,
7 then if we do an audit or do an evaluation and
8 we found out, those costs may be deemed
9 unallowable and you may be required to refund
10 the government.

11 MS. PANDO-BEHNKE: That's why I was
12 asking.

13 MR. ADELSON: Yes, let me just say,
14 as a general matter, I'm not sure what kind of
15 restrictions you're referring to. You
16 mentioned Buy American restrictions?

17 MS. EUGENIO: Fly America.

18 MS. PANDO-BEHNKE: Fly America and
19 Buy America.

20 MR. ADELSON: Okay. Yes, I'm not
21 sure how those really figure in. You know, if
22 they apply to grant money as opposed to our
23 procurement money. We have restrictions about
24 what we can do with our own procurement funds.
25 But when we're granting money, I'm not sure

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1 if that applies further down the line in terms
2 of what you do with the money, unless it's an
3 unallowable cost.

4 MS. PANDO-BEHNKE: Maybe I can
5 follow up later.

6 MS. EUGENIO: Okay.

7 MS. PANDO-BEHNKE: Okay. Then --
8 I'm sorry, going back to the DUNS question. I
9 just want to clarify. If we have associates
10 as part of our proposal that currently do not
11 have DUNS numbers because they are local
12 organizations, would we be able to -- would
13 they be able to apply for a DUNS number after
14 the award? Or do they have to have the DUNS
15 number before the award is made, so as of the
16 point the proposal is submitted?

17 MR. HARGROVE: They need to have
18 that before.

19 MS. PANDO-BEHNKE: Okay. Okay.

20 Then my last question is country-
21 specific for the Dominican Republic. In the
22 section of the SGA which discusses targeting
23 and geographic focus, I see that there is no
24 geographic focus for the DR. I was just
25 wondering if there is a specific geographic

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1 focus that we should be looking at.

2 MS. MUIRRAGUI: If it's not in the
3 SGA, it's not in the SGA.

4 MS. PANDO-BEHNKE: Okay, it --
5 okay.

6 MS. MUIRRAGUI: And so, I think --

7 MS. PANDO-BEHNKE: Actually, it is
8 --

9 MS. EUGENIO: So, the entire
10 country. I mean you or any other applicant
11 then can determine how to apply that scope of
12 work to either a region of the country or the
13 entire country.

14 MS. PANDO-BEHNKE: Okay, thank you.

15 MR. WILLCUTTS: And I just might
16 note, you know, again, I think as Eileen was
17 bringing up, this is true for all of those
18 country-specific sections. If we included in
19 that country's specific scope of work, a
20 certain geographical area or a certain target
21 population, then you need to look for that.
22 If it's not there, it doesn't mean that you
23 shouldn't identify a geographic area but we
24 haven't stated a specific requirement. So,
25 it's open.

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1 MS. EUGENIO: And I'm sorry, but
2 just in fairness to -- I see a couple of
3 people who have been standing there for a
4 little while so maybe -- no, that's okay.
5 Maybe what we will do is we'll run through
6 your questions and then go back over here. If
7 you don't mind --

8 MS. MARTONOVA: Good morning. My
9 name is Ingrid Martonova from World Education
10 and I have sort of a three-part question all
11 relating to partnering agreements, procurement
12 issues, mainly as a follow-up to something
13 that's already been mentioned.

14 You mentioned earlier that around
15 partnering agreements, a lead organization can
16 have an agreement with associates or partners.

17 I was wondering whether these are two
18 different terms, or they're being used just
19 interchangeably? Do they mean the same thing?

20 The other question I have is around
21 obtaining DUNS certification numbers for local
22 NGO partners. Do you have just any guidance
23 on how -- how does one do that? I'm not sure.

24 If you can point me to regulations or
25 guidelines on that.

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1 And the third one around -- you had
2 noted that there's a preference for competing
3 subcontracts. Does that then mean that we
4 really should not be identifying in proposals
5 preferred subcontracting NGOs, local NGOs?

6 MS. EUGENIO: Dennis, can I answer
7 the last question first though because I think
8 it's -- I mean -- and we've encouraged in the
9 past, applicants to tell us who their, and we
10 used the word "partnering", not in the sense
11 of an association but more like who you will
12 be collaborating with in order for us to
13 assess the overall design of the project.

14 MR. ADELSON: Right.

15 MS. EUGENIO: So we -- and we also
16 understand that there are certain situations
17 and certain geographical areas in certain
18 countries where maybe only one or two NGOs may
19 be available to provide the services that are
20 needed. So, while, we may want a lot of
21 competition, the competition may be somewhat
22 limited to that.

23 MR. ADELSON: Right.

24 MS. EUGENIO: So, can you provide
25 us a little bit more guidance on --

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1 MR. ADELSON: Maybe a little bit
2 more.

3 Certainly, you want to identify the
4 associates that you're -- that are co-applying
5 for the grant. That should be identified up-
6 front. And if you know there is one or more
7 subcontractors you will be using, you know,
8 you can identify those in the application.
9 That will be part of the evaluation.
10 Generally, we would like to see those
11 subcontractors selected by some competitive
12 means. It's more of a preference or an
13 encouragement on the part of our government
14 that competition be used.

15 As Marcia points out, in many
16 cases, there will not be a lot of competitors
17 available, and so you naturally have limited
18 available competition. We ask you to do your
19 best in identifying the best source for your
20 subcontracted services or goods to implement
21 the spirit of competition. Sometimes there
22 will be only a sole source. Sometimes it may
23 be a limited one or two or three sources and
24 we hope that you will look to the best of
25 those to most efficiently provide the

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1 services.

2 I think your first question on the
3 side agreements, when we talk about partners
4 and associates, it's essentially the same
5 thing -- is the same thing. Any agreements
6 you might have among the people who will be
7 applying together for the grant, that's up to
8 you to do. We don't need to see those.
9 That's purely for allocating any risks,
10 liabilities, responsibilities among the
11 various partners, associates, co-grantees.
12 It's all the same thing.

13 MR. WILLCUTTS: I just want to
14 point you to a part of the SGA that speaks to
15 the DUNS. If you're looking at page 32894 and
16 it's the third column. It's number two under
17 Eligibility Information. Actually, this gives
18 you the information that you'll need. It
19 speaks to -- I also want to point out, notice
20 that there's no charge for obtaining a DUNS
21 number. To obtain a DUNS number, we provide a
22 1-866-705-5711 number and access via the web.

23
24 Also, there's a note that requests
25 for exemption from the DUNS number requirement

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1 must be made to the Office of Management and
2 Budget, Office of Federal Financial Management
3 and we provide a number. If no DUNS number is
4 provided in the application and the applicant
5 does not provide evidence of an OMB exemption
6 from the DUNS number requirement, then the
7 applicant will be considered non-responsive.

8 After receiving a DUNS number, applicants must
9 also register as a vendor with the Central
10 Contractor Registration and we provide the
11 website that that should be done at.

12 So, I think you'll find in that
13 section -- you should find all the information
14 you need on DUNS. Probably more information
15 than any of us ever wanted to know about DUNS.

16 But if you have further questions, you can
17 also contact Lisa Harvey. And I don't know if
18 Troy wants to add anything?

19 MR. HARGROVE: No. You've taken
20 care of it.

21 MS. MARTONOVA: Thank you.

22 MS. EUGENIO: I think we're going
23 to go to Vicky first.

24 MS. WALKER: Hi, I'm Vicky Walker
25 with Winrock International. I have a very

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1 brief question regarding the clarification on
2 the direct beneficiaries and the numbers in
3 ratio.

4 May we propose the proportion for
5 withdrawn and prevented, or should that be a
6 50 percent? How is that open this time,
7 please?

8 MS. EUGENIO: I think every year we
9 go through this question which is a good
10 question to go over. I guess the question is,
11 from our point of view, what would be the
12 preference in terms of withdrawing or
13 preventing children?

14 Given that we're working -- and in
15 many cases, you would be working with children
16 that are engaged in the worst forms of child
17 labor. Convention 182 calls for the immediate
18 elimination of those conditions. Our
19 preference will be that you work with children
20 that need to be withdrawn from that situation.

21 Just, if you think about it, I mean if I want
22 to kind of, you know, provide services to a
23 child that is currently being exploited in
24 commercial sexual exploitation as opposed to
25 one that I could prevent from engaging in it,

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1 I want to help that child that is being
2 currently exploited.

3 Now, it would be up to you, given
4 the situation that you're working in, the
5 country, the area, to kind of bring that
6 balance. So you determine the ratio and we
7 will take that into consideration. But just
8 from our office and our preference, I would
9 say that just think about that. If you're
10 working in an unconditional worse form child
11 labor, we really, really would like you to try
12 to take those children out of those
13 situations.

14 The other part of -- actually, I
15 wanted to add something to that answer that is
16 not directly related to your question, Vicky,
17 but I think it is important. We were talking
18 before about the age of the child when they
19 enroll in the program, whether the child is,
20 you know, nine or 12, 15, or 16, or 17. We do
21 not want to say that you should not enroll any
22 child that is 17-years-old in your program.
23 But we also do not want the focus of the
24 program to be 17-year-olds when there are a
25 lot of other children that are much younger

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1 and may need assistance. So, you know, we
2 would like you to take that into
3 consideration. We will look into that. If we
4 see a disproportionate amount of children, a
5 number of children, that are in the age range
6 of, you know, 16 to 17 years old, then we may
7 have a conversation with you about that
8 particular targeting.

9 MS. WALKER: Thank you.

10 MS. EUGENIO: Thank you.

11 MR. MUGISHA: Hi, my name is Vince
12 Mugisha. I'm from Catholic Relief Services in
13 Benin and Togo. Togo will be holding very
14 important elections in August, and I hear they
15 might be postponed to September, these --
16 elections. We have been discussing with the
17 local mission in Togo and they say -- well,
18 the message we're getting is that USG funding
19 might be restricted, especially if the process
20 and outcomes are not positive, are not
21 acceptable to them.

22 I guess my question is, does USDOL
23 intend to go ahead on the grant, if the
24 processes and outcomes are not acceptable to
25 the US Government? Thank you.

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1 MS. EUGENIO: Well, I mean --
2 another good question.

3 We've been in situations before
4 where conditions in the country has somewhat
5 restricted our ability to implement, or even
6 initially consider funding of projects. But
7 once we start the process of the SGA, we will
8 continue with the funding until we're advised
9 by the Department of State or through the
10 White House, that we can no longer continue
11 with the implementation of the project. So,
12 as far as we know, there are no current
13 restriction -- funding restrictions for Togo,
14 so we will continue with that funding.

15 MR. JOSHI: I'm Sudhanshu Joshi
16 from the International Center on Child Labor
17 and Education, and I have two questions.

18 One is that the point on leveraging
19 funds. I think the most strategic method of
20 leveraging funds is that how you access
21 resources from the governments in line with
22 your indicators that how you enhance the
23 capacities of the national governments. Also,
24 the state governments within large countries.
25 How would your guidelines be then, say,

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1 matching in determining how the locally raised
2 resources from the governments are being spent
3 in the context of the projects?

4 My second question is that in
5 disentangling the DUNS for the local
6 organizations at the country level, will the
7 embassies be providing some kind of
8 facilitative support? Thank you.

9 MS. EUGENIO: Okay, let me answer
10 the second question first. I always think the
11 second questions are easier to answer.

12 For the second question, we have
13 not asked our embassy to provide support with
14 the DUNS. I mean, we have not encountered any
15 organization that, either going through the
16 toll-free number or the website, had problems
17 registering for that number. So, our
18 assumption at this point is that this is a
19 fairly straightforward -- I don't want to say
20 easy, but at least straightforward process.
21 And if you're encountering problems with
22 registering, my only advice at this point will
23 be to call the Procurement Services Offices,
24 Lisa Harvey, and communicate to her that, you
25 know, you're encountering problems and what

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1 the nature of that problem will be -- at the
2 time.

3 Regarding the first question and
4 the issue of leveraging resources from
5 government sources, we are in complete
6 support, and we actually encourage, government
7 contributions to our programs. You know, that
8 has been something that we've been working
9 towards for a long time. Unfortunately, we do
10 not have as many governments that are
11 providing matching contributions or support --
12 direct financial support to the projects.
13 There's a lot of in-kind contributions that
14 are provided from different governments and we
15 really appreciate that, but we will
16 definitely encourage matching contributions.

17 There is one project that we have
18 specifically and I'll mention it -- it's India
19 -- where there is 50/50 contribution from the
20 United States and from the government of
21 India. In that particular project, the way
22 that the project was set up, the funding was
23 completely separated. So, the funding
24 restrictions for the US Government did not
25 apply to the funding for the government of

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1 India. But that was -- from the very
2 beginning, it was set up that way. But as
3 Dennis mentioned, any cost sharing, any
4 resources are a part of the project, whether
5 they're coming from the government, private
6 sector, or local NGO. If they're part of the
7 project, they will be subject to the same US
8 regulations as to federal funding coming from
9 the Department of Labor.

10 MR. WILLCUTTS: And I'd just like
11 to say, when we talk about matching funds, you
12 may talk about it differently when you talk to
13 different partners in the country. But we're
14 referring to matching funds as those funds
15 that you are indicating on your SF 424 and
16 your SF 424-A as matching funds. You're
17 listing it there. And if you have done that,
18 then you have undertaken that obligation that
19 those funds will be brought forward.

20 If an organization doesn't come up
21 with those funds, that's an obligation you're
22 liable for which is part of the reason why
23 there's -- since you have an additional
24 obligation, we also give an opportunity for
25 some additional points. But just to

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1 distinguish that because sometimes the term --
2 you might be talking with someone and they say
3 they want to match. If you're not listing it
4 there, that's not the same as what we're
5 talking about. So, just to clarify.

6 MS. AIELLO: Good morning. My name
7 is Helene Aiello from Kuhlisa Management
8 Services in South Africa. My questions are
9 primarily about bidding and the organization.

10 I've read the 2006 Q&A and I think
11 I've got the answer, but I just would like to
12 hear it again. So, my one question is, can a
13 non-US organization lead an application? The
14 second one is can a non-US organization who
15 has developed a niche area be on several bids
16 as a subcontractor?

17 MR. WILLCUTTS: Yes, in response to
18 the first one, can a non-US based organization
19 apply or be the lead? Absolutely. We have
20 had local organizations that have applied, not
21 as the lead but as the sole. They could do
22 that. They could apply as the lead
23 organization, so in either way.

24 Then you were asking about a
25 subcontract that an organization -- whether an

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1 organization might be a potential
2 subcontractor with more than one group.
3 There's no restriction in terms of that. Each
4 application is considered independently. So,
5 we'll be looking at evaluating each one based
6 on what's there.

7 MS. AIELLO: And just one more. At
8 the beginning, there was a 160-page document
9 mentioned and I got a little --

10 MR. WILLCUTTS: The rest of the
11 pages will be coming out tomorrow.

12 MS. AIELLO: Okay.

13 MR. WILLCUTTS: No, no, no. Please
14 don't record that. It's actually about 45
15 pages in here. When it was in a Word format,
16 double-spaced, it was about 160-some-odd. But
17 it's about -- the document is 45 pages. You
18 are seeing everything that's right here.

19 MS. AIELLO: Thank you. I'm
20 relieved.

21 MR. WILLCUTTS: Sure.

22 MS. ELLISON: Sylvia Ellison from
23 Creative Associates International.

24 Will we have access to reports,
25 research and evaluations? If so, how can we

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1 get access?

2 MS. EUGENIO: I'm sorry. Are you
3 looking for specific information about a
4 particular country, or just generally?

5 MS. ELLISON: Of the ongoing
6 projects that are related to these activities?

7 MS. EUGENIO: I see. So, of the
8 ten countries that are listed, if there are
9 reports of projects that we're funding and all
10 of that?

11 MS. ELLISON: Reports and
12 evaluations, yes.

13 MS. EUGENIO: Reports, you mean
14 progress reports or evaluation reports? I
15 just want to clarify what you're asking.

16 MS. ELLISON: Any type of reports,
17 whether it be progress reports, whether it be
18 evaluations, whether it be reports that came
19 out of the activities themselves.

20 MS. EUGENIO: Okay.

21 MS. ELLISON: Yes.

22 MS. EUGENIO: I guess the answer in
23 two parts. The first one is evaluation
24 reports and progress reports. We usually
25 provide those to a FOIA request, so a Freedom

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1 of Information Act request. So if you send us
2 and say, "I would like to see this", then we
3 will go through the process of FOIA and
4 release the reports that way.

5 We are -- in my office, in a way,
6 we're trying to put into the Internet so that
7 everyone will have access, the Executive
8 Summaries, the evaluation reports, auto
9 reports and things like that. But that is
10 taking a little while so, I mean, hopefully
11 within the next couple of months we'll have
12 all of that up in the website.

13 For reports that the project itself
14 might have produced, I'm trying to figure out
15 what the best way to provide those would be.
16 I guess the best way that I can tell you is if
17 you have a specific request, just kind of
18 write to us what you would like to see for the
19 particular country that you wanted. And then
20 we'll proceed from there and see what -- how
21 we can get you the information.

22 Yes, I mean, the other way Kevin
23 just suggested, is to go to the organizations
24 directly. I mean, a lot of the reports that
25 they produce are public reports. So, they

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1 will be happy to share a copy with you.

2 MS. MUIRRAGUI: Also, some of them
3 are on project websites but it really varies
4 by project.

5 MS. EUGENIO: I'm sorry. Do you
6 have a follow-up?

7 MS. ELLISON: No. I was just going
8 to say would that include evaluations?

9 MS. EUGENIO: The evaluations are
10 different. The evaluations are a part --
11 especially for mid-term evaluations because
12 they're part of the ongoing internal process
13 of the project. Those would not necessarily
14 be on the website, but we would like
15 eventually to be able to put at least the
16 Executive Summaries of those evaluations up on
17 the website. And if you -- again, they're
18 public documents. So, if you send us a FOIA
19 request, we will send it to you.

20 MR. DOGGETT: Tony Doggett again
21 from AIR.

22 I was a little confused by the
23 India example and I'm wondering, the matching
24 funds that the government of India put up, was
25 that considered leveraged funds or matched

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1 funds? And if they were matching funds, would
2 they not be subject to the same requirements
3 as you said earlier?

4 MS. EUGENIO: Well, no --

5 MR. DOGGETT: Could you clarify
6 that?

7 MS. EUGENIO: Yes. India was
8 considered a co-donor in this project, so
9 there is a little bit of a difference. It was
10 not leverage. It was not matching funds.
11 They were basically like the United States
12 Government and the government of France
13 basically saying, "we're going to fund a
14 project together."

15 So, that was the difference between
16 saying -- from the beginning, I mean, we were
17 undertaking this project together and I'm
18 putting half of the money and you're putting
19 half of the money, as opposed to a grantee
20 saying, "I'm the lead organization in this
21 project, but I've convinced the government to
22 give me \$5,000.00 to contribute to this
23 particular component. But this is going to be
24 a microcredit component, loan."

25 I mean, are they subject to the

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1 regulations of the US Government? In that
2 case, they would be because there is not a co-
3 donor type situation. It's more, they're
4 basically bringing in resources into the
5 project for something that is not considered
6 an allowable activity.

7 MR. DOGGETT: So they were neither
8 leveraged nor matching funds?

9 MS. EUGENIO: No, they were not.
10 They were not.

11 MR. DOGGETT: Neither.

12 MS. EUGENIO: They were a donor
13 country -- two donor countries going --

14 MR. DOGGETT: Okay, so a completely
15 different animal here.

16 MS. EUGENIO: Correct.

17 MR. DOGGETT: I would just like to
18 -- my predecessor at the microphone here, I
19 would really like to encourage USDOL to,
20 rather than just limit it to FOIA requests,
21 put all technical quarterly reports and
22 evaluations on your website.

23 MS. EUGENIO: I -- I -- you know, I
24 mean I would like to do that. I mean, just so
25 that you know how many projects we have, or

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1 how many of those things we get on a,
2 sometimes quarterly, semi-annual basis. Yes,
3 that is our intent. For the purpose of
4 transparency and for the purpose --

5 MR. DOGGETT: Great.

6 MS. EUGENIO: -- of assisting
7 everyone to kind of have the same information.

8 And not just the evaluation reports. We will
9 also be putting up the audits reports. That
10 should be a lot more interesting.

11 MR. DOGGETT: Okay, thank you.

12 MS. LINDLEY: Hello, my name is
13 Beth Lindley from International Center on
14 Child Labor and Education. I have two
15 questions.

16 One is, if you have leveraged funds
17 or matching -- leveraged resources or matching
18 funds, should your budget reflect those?
19 Should you count on those, or should your
20 budget reflect only USDOL-anticipated funding?

21 MS. EUGENIO: I think it should be
22 both, right Dennis? I mean, because you're
23 including it in that --

24 MR. ADELSON: Right. If you expect
25 to obtain a commitment for matching funds, it

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1 should be reflected in the budget because
2 that's part of your promise. You're promising
3 to -- you're going to tell us what you're
4 promising to do with the money you're asking
5 for, and what you're promising to do with the
6 piece of matching funds. Both of those become
7 part of the obligation if we grant you the
8 award.

9 MS. LINDLEY: And my second
10 question is, could you elaborate a little bit
11 on partial bids? What is expected when you
12 submit a partial bid?

13 MS. EUGENIO: We've had limited
14 experience with grantees submitting partial
15 bids. So just basically submitting less -- a
16 bid for less than the amount that we have
17 indicated. In the cases where that happens
18 and we see that a grantee -- and it could be a
19 local organization that only has the capacity
20 to implement half-a-million dollars or a
21 million dollars and where they want to be part
22 of the competition. If that proposal that
23 they submitted as we're going through the
24 evaluation criteria -- remember, the
25 evaluation criteria is not based on the full

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1 -- the dollar amount of the grant. It's based
2 on what we've indicated we would be looking
3 at.

4 If that organization in their
5 proposal is fairly highly rated, we will
6 consider awarding that amount of money, that
7 partial amount of money, to that organization.

8 Then the next organization in that rating,
9 then we will discuss with them, perhaps
10 amending their bid to kind of come in for the
11 rest of the funding that is still available,
12 if they want to compete for that.

13 MR. KOOMSON: Hi, my name is
14 Anthony Koomson with World Vision. I'd like
15 some further explanation on the religious
16 issue -- time and space clarification. I read
17 in your audit -- there was an audit finding in
18 Kenya, and I wanted to know if in a school,
19 children are involved in prayer, school prayer
20 in the morning or whatever, in that case, does
21 it infringe or is it a prohibited activity?
22 What do we classify it?

23 MR. ADELSON: Yes, this -- yes,
24 it's a troublesome area. Generally, it's not
25 prohibited for children to engage in a

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1 religious activity, or for you as the grantee,
2 to promote or foster, or operate a religious
3 activity. But it can not be done with USG
4 funds, so you have to make a separation to
5 show that it's clear that only your money, or
6 someone else's money, was used to fund that
7 activity and that the USDOL funds were used
8 for proper grant activities.

9 Now, that gets tricky but -- for
10 instance, let's say you're paying the salary
11 of a teacher. You're paying the teacher for
12 eight hours of work a day. The first four
13 hours are religious school. The afternoon
14 session is mathematics. You would then say
15 only one-half of the teacher's salary, the
16 afternoon portion, can be paid for with our
17 money. The morning session for religion must
18 be paid for some other way. There should be
19 an accounting to show that that has been done.

20 And if there are not sufficient records, the
21 auditors may come through and say, "you know,
22 we think that federal money was used to pay
23 for religious teaching", and they would
24 disallow that money.

25 So you need to keep very strict

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1 records as to what's being done and how it's
2 being paid for.

3 MS. MURPHY: Are there any further
4 questions? Okay.

5 MS. EUGENIO: I've been asked to
6 give you a couple of announcements before we
7 go.

8 I believe Kevin mentioned, and I
9 just want to mention it again, that in your
10 packet of information you should have gotten a
11 brochure that contains a CD-Rom with all the
12 publications that the Department of Labor has
13 published. Again, if you need additional
14 copies of that brochure and CD-Rom, feel free
15 to contact our office and we'll be happy to
16 send you that.

17 Yes, Eileen is showing it.

18 Then the other thing is that there
19 were -- you had a lot of good questions and
20 we're happy to be here to respond to those
21 questions. We are also going to publish in
22 our website, a list of frequently asked
23 questions. So, you'll have that at your
24 disposal. So, some of the questions that you
25 asked here today and some of the questions

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1 that maybe you didn't think of asking, will be
2 in the website. So you may want to check our
3 website for that.

4 The other thing is, in a couple of
5 weeks, we're going to publish the transcript
6 from this meeting. And again, it's for the
7 purpose of sharing information with those
8 potential applicants that couldn't be here
9 with us today, and for you to refresh your
10 memory. If you asked a question and you want
11 to go back and see what it was that we
12 responded, that will be in the transcript. I
13 cannot give you an exact date for that, but
14 check in about two weeks and this document
15 should be there.

16 Finally, again, I would like to
17 thank all of you for coming. I would also
18 like to thank the presenters who got up here,
19 and especially some of the people from --
20 Dennis and Troy that were answering some of
21 the most difficult questions, particularly
22 Dennis. Remember, Dennis' job and Troy's job
23 is to keep us all out of trouble and in
24 keeping us focused in accomplishing the
25 mission that we have at hand, which is

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1 providing children with alternatives to
2 exploitive child labor.

3 Finally, I would like to thank
4 Michal Murphy and Doris Senko for making all
5 the arrangements for this meeting, and for
6 getting you all in here and for, you know,
7 making sure that we had all the presentations
8 ready and the room and everything. So, we
9 really thank them for their hard work.

10 We look forward to receiving your
11 applications and good luck to everyone. We
12 look forward to working with all of you. So,
13 thank you.

14 (Whereupon, at 11:49 a.m., the
15 foregoing matter was adjourned.)

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