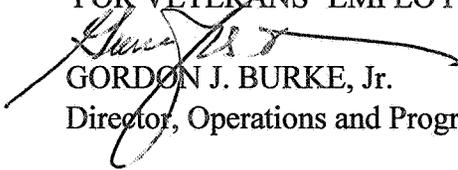




DIRECTOR'S MEMORANDUM: #13-06

MEMORANDUM FOR: ALL REGIONAL ADMINISTRATORS AND DIRECTORS  
FOR VETERANS' EMPLOYMENT AND TRAINING

FROM:

  
GORDON J. BURKE, Jr.  
Director, Operations and Programs

SUBJECT:

Guidance for Reviewing and Processing Jobs for Veterans State  
Grant Quarterly Reports

- I. **Purpose:** To provide guidance to field staff engaged in reviewing and analyzing Jobs for Veterans State Grant Quarterly Reports.
- II. **References:** Title 38 of the United States Code (38 U.S.C. Chapter 41); Veterans' Program Letter (VPL) 07-05, dated July 27, 2005 and VPL 02-06, dated February 8, 2006.
- III. **Background:** VPL 02-06 was issued to the State Workforce Agencies (SWA) and VETS field staff on February 8, 2006. It provided instructions and timelines to be used by States to prepare and submit recurring reports for the Jobs for Veterans State Grants. As stated in that VPL, States submit the Manager's Quarterly Reports on Services to Veterans in accordance with VPL 07-05.

The following guidance is to be used by Directors for Veterans' Employment and Training (DVETs) and Regional Administrators for Veterans' Employment and Training (RAVETs) to ensure submitted reports are consistent. It also provides general information to assist field staff in meeting financial and activity/performance analysis needs of the Jobs for Veterans Lead Center (JVLC) and National Office.

IV. **Changes to Quarterly Reporting Process:** As noted in VPL 02-06, several changes to the reporting process will be fully implemented beginning with the 2<sup>nd</sup> Quarter, Fiscal Year (FY) 2006 Quarterly Report. The following synopsis is provided to help field staff better understand the changes:

A. **Expenditure Detail Report (EDR):** The one-page EDR (or an alternative format) replaces the five Financial Planning and Reporting Worksheets previously used. The EDR was developed to simplify fiscal reporting for the States and provide the basic level of detail needed for reporting by the JVLC and National Office, namely Direct and Indirect Costs for each program activity. If a question arises and more detailed information on expenditures is necessary, the Special Grant Provisions allow the DVET as the Grant Officer's Technical Representative (GOTR) to obtain this information. Two versions of the EDR were provided with VPL 02-06; one for fiscal accounting systems that report cumulative expenditures and the other for fiscal accounting systems that report quarterly expenditures. The report will automatically calculate some of the data elements. Data on the EDR will be manually entered by VETS field staff once the automated reporting system is completed.

B. **SF 269A Financial Status Report (Short Form):** States will submit two SF 269A forms—one for the Local Veterans' Employment Representative (LVER) program and one for Disabled Veterans' Outreach Program (DVOP). The two forms are differentiated by the Catalog of Federal Domestic Assistance numbers listed on the forms. The SF 269A for LVER should include all expenditures for LVER staff, Transition Assistance Program (TAP) Employment Workshops, Performance Incentive Awards (regardless of the recipient) and LVER Special Initiatives. Only expenditures for DVOP activities and DVOP Special Initiatives should be included on the DVOP SF 269A. These changes were made to align the fiscal reporting for each program activity with that used to forecast spending in the State Plans beginning in FY 2006. Block 11 of the SF 269A forms is optional for all States. Some States do not negotiate a maximum Indirect Cost Rate with the Department of Labor and the amount of Indirect Costs expended are reported on the EDR.

C. **Reporting DVOP Specialist and LVER Staff Positions:** The number of DVOP and LVER positions paid by the Jobs for Veterans State Grant can be reported in more than one way. Depending on the type of report, the JVLC and National Office use different data sets to meet reporting requirements. When raw numbers are needed, the Staffing Directory provides data on the number of half- and full-time DVOP specialist and LVER staff positions that can be supported by the Grant, as well as information on vacancies and LVER staff that fulfill Lead or Central Office roles. When calculating the Cost per Position for DVOP and LVER, staffing numbers reported as Base Positions Paid (BPP) are used. This number accurately reflects the actual number of positions that were paid each quarter, after accounting for vacancies, vacation, and other staff absences. Base Positions Paid can be reported two ways—including Administrative, Staff and Technical

(AS&T) costs and excluding AS&T costs. The BPP reported on the EDR should exclude AS&T costs.

**D. TAP Quarterly Report:** The TAP Quarterly Report worksheet was eliminated due to its redundancy and in some cases, burdensome requirement for the States. While DVETs obtain the TAP Employment Workshop participant data from a variety of sources, i.e. the TAP site staff, facilitator, or the State Workforce Agency, the information is ultimately controlled by the Department of Defense. All reporting information on TAP participants is still required and will continue to be entered directly into the Veterans' Employment and Training Operations and Programs Activity Report (VOPAR) system.

**E. Report Distribution:** The JVA-VETS mailbox was originally implemented to collect reports until such time as an automated reporting system was developed. The mailbox did not prove to be effective because of data storage limitations, firewall issues, and the inability to catalog/retrieve reports in an expeditious manner. The distribution scheme for the Quarterly Reports and Annual Incentive Award Summary Report has been streamlined to allow RAVETs to establish requirements in their Regions, to better utilize electronic reporting, and to meet the requirements of the Special Grant Provisions. When properly implemented, the new distribution scheme will eliminate duplication of effort and multiple copies of corrected reports. Specifically:

- States should now provide the Quarterly Report and if applicable, the Annual Incentive Awards Summary Report to the DVET in electronic and hard copy;
- After ensuring that the State's report is complete and accurate, the DVET will forward the electronic reports and their analysis to their Regional Office in accordance with instructions provided by their RAVET; and
- After notification of review and clearance by the RAVET, the DVET will advise the State that the report is cleared and that the original, signed report should be submitted directly to the Grant Officer. Regional Offices will email the State's electronic reports to the following email addresses at the JVLC and National Office: Mendoza.Alfredo@dol.gov and Hecker.Patrick@dol.gov.

**V. The Automated Reporting Process:** As noted above, neither States nor field staff should forward any component of a Quarterly Report or Annual Incentive Awards Summary Report to the JVA-VETS mailbox. Until directed otherwise, DVETs should continue to upload both SF 269A forms to DLIMS II.

The VOPAR system will soon be expanded to accept reporting data on the Jobs for Veterans State Grant. While the programming has just begun, planned changes to VOPAR will:

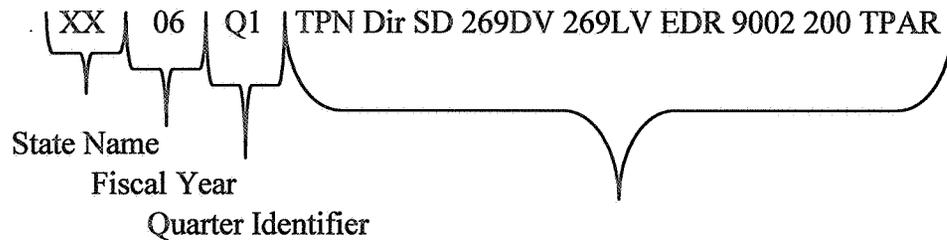
- Allow field staff to enter a State Profile and Fiscal Plan;
- Allow RAVETs to create the Notice of Obligation Authority (NOA);
- Allow SF 269As to be uploaded as part of the E-Grants initiative;
- Allow field staff to enter data extracted from the Quarterly Report (SF 269A, EDR, Staffing Directory, etc);
- Allow DVETs to enter a brief analysis and comments; and
- Allow RAVETs to enter a brief analysis, comments and their concurrence or non-concurrence with the DVET's recommendation on resource reallocation.

When the expanded VOPAR comes on line, field staff will receive detailed instructions on entering past and current data in the system. Until that time, DVETs should maintain hard copies of all State Plans, Quarterly Reports, and Annual Incentive Awards Summary Reports from FY 2004 and forward for reference.

VI. **Financial Reporting**: The fiscal portion of the Quarterly Report is used by the JVLC and National Office to make recommendations and decisions regarding future quarterly allocations, reallocations, and to determine the availability of funding for pending modifications requests. Therefore, DVETs and RAVETs should work closely with States to ensure States submit accurate reports in a timely manner. Currently,

- States must submit their Quarterly Report no later than 45 days after the end of each Federal fiscal quarter. **NOTE:** If the date due falls on a Saturday or Sunday, reports are due the Friday before. DVETs should work closely with their points of contact to ensure the state meets this suspense and to offer technical assistance when needed. DVETs will notify their RAVET when an extension is needed and keep him/her informed about issues or problems.
- When funds are expended in the 5<sup>th</sup> Quarter, States and DVETs must submit two completely separate quarterly reports – one for the 1<sup>st</sup> Quarter of the new FY and one for the 5<sup>th</sup> Quarter of the past FY. The reports contain information on two separate grant awards and cannot be co-mingled.
- States may submit their Final Quarterly Fiscal Report at any time after they determine that all funds in the program have been obligated and expended. Therefore, the final financial reports for the LVER program may be submitted at different times than for the DVOP program. All Final Quarterly Reports are due **no later than** May 15<sup>th</sup> each fiscal year.

**VII. Format and Designation of Electronic Reports:** States may submit the electronic copy of their reports using any format, (e.g. Microsoft Word, Excel, or Adobe Acrobat). The JVLC and National Office retain electronic copies of reports from both the States and from VETS field staff, for analysis and reference and must be able to readily identify a file’s content by its name. Therefore, beginning the third quarter of FY 2006, DVETs will ensure that all report files they send forward use the a standard format that identifies the state name, fiscal year, quarter being reported and all documents included according to the designations described below:



- TPN = Technical Performance Narrative
- SD = Staffing Directory
- 269 DV = DVOP SF 269A
- 269 LV = LVER SF 269A
- EDR = Expenditure Detail Report
- 9002 = ETA 9002
- 200 = VETS 200
- TPAR = DVET Technical Performance Analysis Report

The abbreviations for each document contained in the named file should be used. If all documents needed for the quarterly report are included in one file, the word “ALL” can be used. The following examples depict the correct way to identify/name electronic files:

- A Word file that includes the Technical Performance Narrative and Staffing Directory from Texas for the 2<sup>nd</sup> quarter of FY 2006 would be saved as **TX 06 Q2 TPN SD.doc**;
- An Excel file that includes both SF 269As and the Expenditure Detail Report from West Virginia for the Final Quarter FY 2005 would be saved as **WV 05 QF 269DV 269LV EDR.xls**; and
- An Adobe file that includes all documents (Technical Performance Narrative, Staffing Directory, both SF 269As, the Expenditure Detail Report, ETA 9002 and VETS 200) from Minnesota for the 1<sup>st</sup> quarter FY 2006 would be saved as **MN 06 Q1 All.pdf**.
- A Word file that contains the Technical Performance Analysis Report (TPAR) from the DVET in Florida for the 5<sup>th</sup> quarter FY 2006 would be saved as **FL 06 Q5 TPAR.doc**

- When Incentive Award funds have been expended and reported, the name of the file submitted will include the state name abbreviation, fiscal year identifier and the words “Incentive Report.” For example, a file named WA 06 Incentive Report.doc contains the Annual Incentive Awards Summary Report for Washington for FY 2006. This report is separate from the quarterly report and should not be included with other electronic files.

**NOTE:** Modification requests may be submitted by States at any time for consideration and decision making if and when funds become available. To ensure they receive timely consideration, modification requests must be fully justified, include the DVET and RAVET recommendation and be submitted as a separate package from the quarterly report.

**VIII. DVET Review, Analysis and Recommendation:** Upon receipt, the DVET will thoroughly review and analyze all reports and related documents provided quarterly by the State and when applicable, the Annual Incentive Awards Summary Report. The DVET review is critical to ensuring:

- The State is expending funds in accordance with their approved State Plan;
- When over-expended in any program, the State has a plan to make up for the deficiency before the end of the fiscal year;
- When under-expended in any program, the State has a detailed plan to spend all allocated funds before December 31<sup>st</sup> of the calendar year or wishes to have the excess funds reallocated;
- The State is allocating costs between Direct and Indirect charges in accordance with the State Plan;
- The State is making good faith efforts to fill vacancies in a timely manner with qualified veterans as prioritized in legislation;
- The State is meeting or making good progress toward meeting their negotiated performance measures;
- DVOP and LVER staff are fulfilling the separate and distinct roles and responsibilities established in legislation and policy guidance;
- DVOP and LVER staff are only serving veterans and other eligible persons when charging to the Jobs for Veterans State Grant;
- DVOP and LVER staff are fully and effectively integrated into the One-Stop system;
- The State is providing priority of service to veterans in all Department of Labor funded employment and training programs;
- Vocational Rehabilitation & Employment (VR&E) clients benefit from the services of a DVOP specialist or LVER;
- The cost for State staff to facilitate TAP Employment Workshops is in line with the State Plan and cost effective for VETS; and
- The State identifies issues, problems, best practices, and success stories that may have an impact on the quality of services provided to veterans.

While not a comprehensive list, analysis of the quarterly report will require the DVET to complete actions such as:

- Verify that costs reported on the EDR are rolled up on the appropriate SF 269A;
- Verify that calculated expenditures, such as those reported in “Cumulative” column are correctly reported on each SF 269A;
- Calculate the staff utilization rate (percentage of planned positions filled);
- Calculate the average cost per position for each program;
- Calculate the average cost per TAP Employment Workshop (when applicable);
- Analyze the percentage of services to non-veterans by DVOP and LVER staff reported on program performance reports;
- Analyze services to veterans as they compare to services to non-veterans; and
- Compare the Entered Employment Rate and Employment Retention Rates or any other outcome measures to negotiated rates and account for variances.

The DVET will complete a Technical Performance Analysis Report (TPAR) that addresses the issues listed above. The TPAR can include information on any other problems or issues that are relevant. When problems are identified, the TPAR should describe actions being taken to address them. When funds are expended in the 5<sup>th</sup> Quarter, two completely separate TPARs – one for the 1<sup>st</sup> Quarter of the new FY and one for the 5<sup>th</sup> Quarter of the past FY must be prepared and submitted.

The TPAR sent to the RAVET should contain a fully explained and supported recommendation in regard to reallocation when funds in any program are under-expended. This information is critical to the RAVETS’ decision on the disposition of excess funding that may be available for reallocation. The National Office must have this information in a timely manner to make informed decisions about future quarterly allocations and pending modification requests.

**IX. RAVET Review and Report Approval:** RAVETs will review the State Quarterly Report and DVET TPAR for accuracy and completeness. They will use the information provided to create a Regional Rollup to send to the JVLC (Attn: Fred Mendoza) and National Office (Attn. Patrick Hecker). Any time a program has unexpended funds, the RAVET will annotate whether or not he/she concurs with the DVET recommendation.

When States in the Region expend funds in the 5<sup>th</sup> Quarter, RAVETs must submit two completely separate Regional Rollups – one for the 1<sup>st</sup> Quarter of the new FY and one for the 5<sup>th</sup> Quarter of the past FY. The Regional Rollup will clearly identify all unexpended funds that are available for reallocation. Attachment 2 is the format that will be used for the Regional Rollup.

**X. Quarterly Report Review Checklist:** A Quarterly Report Review Checklist, provided as Attachment 1, is for use by state VETS staff. Reviewers should pay close attention to the checklist to ensure the State has submitted all necessary documents listed in VPL 02-06 and that the report is accurate and contains a complete and thorough analysis.

**XI. Actions Required:**

- A. DVETs are encouraged to meet with the State to provide technical assistance and training on the changes to the reporting process. They will ensure that all required documents for recurring reports are provided by the State in both hard copy and electronic copy. Upon receipt, they will accomplish a detailed review of all reports and ensure the attached review checklist is completed. After all action items identified for correction and/or explanation have been cleared, the DVET will forward the report(s) to the Regional Office as directed by their RAVET.
- B. RAVETs will review submitted reports for completeness and accuracy. After the review, RAVETs will coordinate with the DVET to discuss any issues found in the report and when applicable, discuss their recommendation regarding resource reallocation. Once assured the report is complete and accurate, the RAVET will notify the DVET that the State is cleared to submit their original, signed report to the Grant Officer. RAVETs will submit reviewed reports and the Regional Rollup electronically to the JVLC, Attn. Fred Mendoza at [Mendoza.Alfredo@dol.gov](mailto:Mendoza.Alfredo@dol.gov) and to the VETS National Office, Attn. Patrick Hecker at [Hecker.Patrick@dol.gov](mailto:Hecker.Patrick@dol.gov) by the last day of the 2<sup>nd</sup> month after the end of the quarter (Feb 28<sup>th</sup>, May 31<sup>st</sup>, Aug 31<sup>st</sup>, Nov 31<sup>st</sup>). If any of the dates fall on a weekend, the report is to be submitted by the Friday prior to the weekend.
- C. After final clearance by the RAVET, DVETs will notify States that the review process is complete and request that they forward the original, signed copy to the Grant Officer.

**XII. Inquiries:** DVETs should refer questions to the appropriate RAVET. Issues that cannot be resolved by the Regional Office should be addressed to Fred Mendoza at the JVLC at (312) 353-4933 or Patrick Hecker in the National Office at (202) 693-4709.

**XIII. Expiration Date:** When superseded or rescinded.

**XIV. Attachments:**

1. Quarterly Report and Annual Incentive Award Report Checklist
2. Regional Office Quarterly Report Rollup Format