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Jobs for Veterans State Grant

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The Jobs for Veterans State Grant

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8.1 Introduction

This volume is intended to explain the processes and activities involved in administering the Jobs for Veterans State Grant (JVSG). It covers grant application, award, reporting, modification, monitoring, and closeout, as well as reallocation of funds, technical assistance, and corrective actions.

Text in this volume is hyperlinked to current statutes, regulations, policy guidance, directives, and related information. Each item in the Table of Contents is hyperlinked to the corresponding section of the manual. Each major section title, i.e. 8.1 Introduction, is hyperlinked back to the top of the Table of Contents. Section titles of subsections are hyperlinked to the next higher section title.

Some of the information appears verbatim in more than one section of this manual. This was done intentionally to make each section stand alone as a complete reference for a particular action. As an example, the information provided on the Staffing Directory is the same in the sections on the JVSG Planning and Application Instructions, Annual Funding Modification Requests, and Interim Modifications. While this does add length to the overall volume, the hope is that it makes it easier to use as an online reference tool.

8.1.1 History of the Jobs for Veterans State Grant

The Servicemen's Readjustment Act (Public Law (P.L.) 346, 78th Congress), commonly known as the G.I. Bill of Rights, was passed in 1944 to assist Veterans reenter the civilian workforce. It reestablished the Veterans' Employment Service and provided for the appointment of Local Veterans' Employment Representatives (LVER) staff.

The 92nd Congress passed the Vietnam Veterans' Readjustment Assistance Act of 1972, Public Law (P.L.) 92-540, which extended priority service for employment counseling, job training and placement services to Vietnam era Veterans. This landmark legislation also extended veterans' priority to widows and spouses of totally Disabled Veterans, prisoners of war, and servicemen missing in action and required the Secretary of Labor to implement stringent administrative controls to ensure the delivery of preferential services to Veterans.

In 1977, President Carter created the Disabled Veterans' Outreach Program (DVOP) as a pilot under the Comprehensive Employment and Training Act (CETA). Staffed in Job Service offices, DVOP specialists conducted outreach in their communities to identify and encourage Veterans to use the employment service and encourage businesses to particularly consider employing disabled Vietnam-era Veterans.

Passed in 1980, P.L. 96-466 established the DVOP as a permanent program and placed DVOP specialists and LVER staff under a new Assistant Secretary for Veterans' Employment (ASVE). The ASVE was renamed by Secretary's Order 4-83 on March 24, 1983 to the Assistant Secretary for Veterans' Employment and Training (ASVET).

The Veterans' Employment, Education and Counseling Amendments of 1988 (P.L. 100-323) detailed position duty statements for Federal and state staff down to the DVOP and LVER positions in the states including hiring and reduction-in-force protections. The Act revised Chapter 41 of Title 38, U.S.C. and amended Chapter 42 to include the requirement for VETS to monitor and report the affirmative action hiring of Veterans by Federal contractors (38 U.S.C. 4212), and affirmative action requirements for hiring and advancement within Federal agencies (38 U.S.C. 4214).

In 1998, President Clinton enacted the Workforce Investment Act (P.L. 105-220) to replace the Job Training Partnership Act (JTPA) and required labor exchange services be provided through a One-Stop Career Center concept. This legislation defined intensive services to include case management.

President Bush enacted the Jobs' for Veterans Act (P.L. 107-288) on November 7, 2002. This legislation revised Chapters 41-43 of Title 38 to give states more latitude in the assignment and responsibilities of DVOP specialists and LVER staff and placed more emphasis on accountability. It requires states to submit a detailed plan of services to Veterans, requires the ASVET to monitor the distribution and use of the funds by the states, and mandates priority of service to Veterans and certain spouses in all employment and training programs funded in whole or in part by the Department of Labor.

8.1.2 Jobs for Veterans State Grant Objectives

The objectives of the JVSG grant are clearly spelled out in the "Purpose" of 38 U.S.C. Chapter 41 where Congress declares that there will be "an effective job and job training intensive services program, an employment placement service program, and job training placement service program for eligible Veterans and eligible persons" (38 U.S.C., 4102). This section further stipulates that priority will be given to the "needs of Disabled Veterans and Veterans who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized through existing programs, coordination and merger of programs and implementation of new programs, including programs carried out by the Veterans' Employment and Training Service to implement all efforts to ease the transition of Service Members to civilian careers that are consistent with, or an outgrowth of, the military experience of the Service Members."

8.1.3 Applicable Policy Guidance (In Order of Precedence)

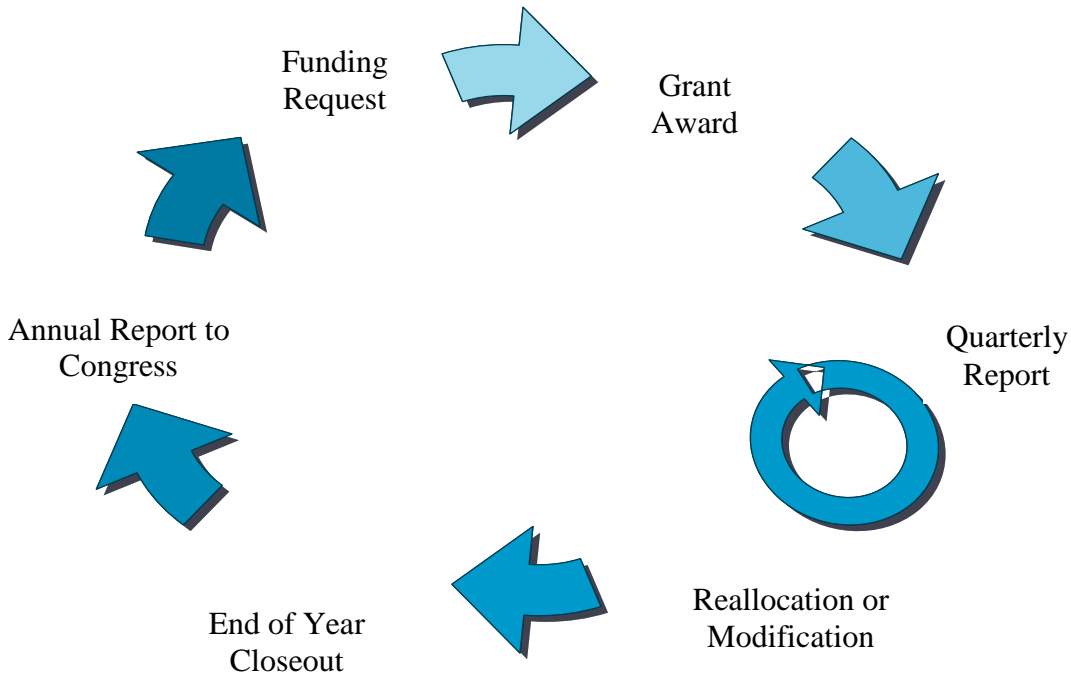
- Federal Statutes
- Public Laws (P.L.) (until codified into law)
- Federal Regulations
- [General Grant Provisions](#)
- [Special Grant Provisions](#)
- [ASVET Memos](#)
- Veterans' Program Letters ([VPLs](#))

8.1.4 Lifecycle of the Jobs for Veterans State Grant (JVSG)

The JVSG is a multi-year discretionary formula program grant. Grantees receive annual funding determined by a formula allocation.

Because the JVSG is awarded non-competitively to all states, VETS does not publish a Solicitation for Grant Applications to notify potential grantees of the funding opportunity. Instead, the five-year lifecycle begins with the issuance of JVSG Planning and Application Instructions transmitted to states via VPL and posted in the Federal government’s grant site, www.grants.gov. In response to planning guidance, states submit a 5-year Plan for Service to Veterans, commonly referred to as the State Plan. The State Plan includes a funding request for the first fiscal year, referred to as the Annual Budget Plan. The Grant Officer issues initial grant awards when the plans are approved and makes funding available for the first year through agency allocations to the regions. The regions, in turn, subsequently issue quarterly Notices of Obligation Authority (NOAs). States operate the grant throughout the year and submit fiscal and performance reports quarterly during the annual funding cycle.

In each subsequent year of the five-year cycle, VETS issues guidance on submission of JVSG Annual Funding Modification Requests. States submit new funding requests for the fiscal year and modify approved State Plans as needed. When approved, the cycle of grant award, NOA, and quarterly reports repeats. Within each year of the 5-year grant lifecycle, there is an annual funding and expenditure lifecycle:



8.1.5 Agency Responsibilities

The ASVET is charged with administering VETS’ grant programs by ensuring funds are expended efficiently, effectively, and in compliance with all legislation and regulations. In the legislatively mandated Annual Report to Congress, the ASVET provides an

accounting of each state's actual achievements as compared to goals approved in the respective State Plan.

The Office of Operations, Grants and Transition Programs, through the Employment and Training Programs Division, is responsible for reviewing all JVSG requests and reports submitted by states, through field staff, to prioritize requests and make recommendations for actions to the ASVET. This includes grant applications, requests for additional information or clarification, quarterly fiscal and performance reports, and modification requests for changes to grant scope, cost or conditions.

A JVSG Grant Officer has delegated authority from the Secretary of Labor to obligate funds on behalf of DOL. The Grant Officer is personally responsible for ensuring (1) there are sufficient funds to obligate; (2) that the terms of the grant agreements are reasonable; and (3) that the goals of the grant program are met. The Grant Officer signs each grant agreement on behalf of the Department, making it a legally binding instrument. Additionally, the Grant Officer reviews all grant applications and modification requests for compliance with governing statutes, regulations, departmental policies and the JVSG Planning and Application Instructions.

8.1.6 DVET Role and Responsibilities

Directors for Veterans' Employment and Training (DVETs) play an important role in the administration of grants, particularly in terms of fiduciary responsibility. In most cases, it is the DVET who is appointed as the Grant Officer's Technical Representative (GOTR). As an advocate for the program, the DVET is involved with his or her state's JVSG recipient, providing technical assistance regarding their drafting of multi-year grant applications, annual and interim modification requests to ensure they meet the requirements of the applicable guidance.

The DVET role as the GOTR is a very dynamic and significant one. The GOTR is the public face of VETS and impacts how grantees view the Agency. Equally important, the GOTR acts as a "coach" to grantees, brokering technical assistance and guiding the progress toward desired outcomes. The performance of VETS' grants directly impacts the Agency's overall performance toward meeting its strategic goals and legislated mandates. Also encompassed in the role of "coaching" is the function of oversight to ensure that funds are expended effectively and appropriately.

In performing these various roles, the challenge for the GOTR is to strike a delicate balance between coaching and monitoring compliance issues. Ideally, the GOTR will identify potential problem areas that he or she can solve with appropriate technical assistance. As the GOTR, the DVET monitors compliance through review of Quarterly fiscal and performance reports submitted by grantees and the Self-Assessment and Validation Reviews of local offices. Each is discussed in detail in the appropriate section of this volume.

8.2 JVSG Formula Grant Funding

Congress appropriates funds from the Unemployment Trust Fund (UTF) National Account annually to support the multi-year, formula JVSGs. These appropriated funds are included in the VETS annual budget and must be obligated in the Federal Fiscal Year (FFY) for which they are appropriated or they are returned to the U.S. Treasury. These funds are obligated by entering into annual grant agreements with the individual states. Once awarded, VETS makes the funds available for states to draw down for spending in accordance with their approved Annual Budget Plans.

The funds VETS provides to states to meet their obligations are, therefore committed funds although they may not actually change hands. To illustrate the term ‘obligated,’ consider a salary check. The take-home pay of most individuals is not free and clear to be spent at their complete discretion even though taxes and other deductions may have already been taken. Most workers have also committed, or obligated, some of their paycheck for such items as a mortgage or rent payment, car payments, or loan repayment. Because the worker is legally committed to making those monthly payments, most of the periodic salary check may already be obligated funds. Even if he or she has the luxury of leaving the paycheck in a savings or checking account for a few weeks before payment is due, the money, while it has not changed hands, is obligated.

UTF funds provided for grants may be obligated at two levels. First, VETS obligates them by entering into grant agreements for programs that will begin during the fiscal year for which Congress appropriated the funds. Second, the grantee either spends or obligates the funds during the funding period which is defined in the annual appropriation.

8.2.1 The Funding Formula

In accordance with 38 U.S.C. §4102A(c)(2)(B)(i), “...the Secretary shall make available to each state with an application approved by the Secretary an amount of funding in proportion to the number of Veterans seeking employment using such criteria as the Secretary may establish in regulation, including civilian labor force and unemployment data, for the state on an annual basis. The proportion of funding shall reflect the ratio of—

- (I) the total number of Veterans residing in the state that are seeking employment; to
- (II) the total number of Veterans seeking employment in all states.”

The funding formula used to determine base grant allocation amounts for DVOP and LVER funding for all states can be found at [20 CFR Part 1001](#). It uses two statistical data sources provided by the Bureau of Labor Statistics (BLS):

[Current Population Survey \(CPS\)](#) – most reliable source of current state level data on the number of Veterans in the civilian labor force. However, because the sample size of Veterans at the state level is so small, the use of CPS to determine Veterans' unemployment rates at the state level is subject to large relative sampling errors; and

The Local Area Unemployment Statistics (LAUS) - considered the most highly reliable data on the general rate of unemployment at the state level, it does not contain the large sampling error found in the CPS. Furthermore, the Office of Management and Budget (OMB) requires Agencies allocating Federal funds that include unemployment as a factor to use LAUS as the indicator of unemployment, unless the authorizing statute specifies otherwise (OMB Statistical Policy Directive 11).

Each year the Bureau of Labor Statistics (BLS) adjusts the LAUS data for the prior three years and releases the adjusted results to the public in late February or early March. Shortly thereafter, BLS makes the state level Veteran civilian labor force data (from the CPS) available to VETS as a custom. The state level data from both of these sources for the most recent three calendar years are averaged for inclusion in the funding formula.

After deducting funding for centralized agency costs from the amount forecast in the annual budget projection, the amount available for the JVSG program is allocated to the states as follows:

Step 1: Calculate the general unemployment distribution of individuals across all states:

$$\frac{\text{Average \# unemployed individuals/state (3-year LAUS)}}{\text{Average \# unemployed individuals/all states (3-year LAUS)}}$$

Step 2: Calculate the Veteran labor force distribution across all states:

$$\frac{\text{Average \# Veterans in civilian labor force/state}}{\text{Average \# Veterans in civilian labor force/all states}}$$

Step 3: Add the two distributions for each state:

$$\begin{array}{l} \text{General unemployment} \\ \text{distribution for each state} \end{array} + \begin{array}{l} \text{Veteran civilian labor force} \\ \text{distribution for each state} \end{array}$$

Step 4: Determine the average of the two distributions for each state:

$$\frac{\text{Sum of the two distributions for each state}}{2}$$

Step 5: Calculate the base grant allocation for each state:

$$\begin{array}{ccc} \text{Average of the two distributions} & \times & \text{Base Grant amount available} \\ \text{for each state} & & \text{for allocation to all states} \end{array}$$

The three-year averages of the LAUS and the CPS data are used in the funding formula to mitigate the impact annual shifts in population and unemployment data could have on individual state funding.

All funding projections are based on projected budget numbers. If the actual appropriation is more or less than that used in the allocation forecast, the Secretary may recalculate the funding formula and redistribute funds. The Secretary will make every reasonable effort to avoid this situation in order to maintain delivery of services to Veterans and reduce the administrative costs of submitting new requests for funding.

8.2.2 Minimum Funding

As authorized by 38 U.S.C. §4102A, the ASVET has established a minimum funding level for grantees receiving funding under the JVSG. The criteria used to establish the minimum funding level is described in [20 CFR 1001.152](#) which states “a minimum funding level is established to ensure that, in any given fiscal year, no state will receive less than .28 percent (0.0028) of the previous year’s total funding for all states. If the appropriation for a given fiscal year does not provide sufficient funds to comply with the hold-harmless provision, the Department will:

- Update, as appropriate, the state estimates of Transition Assistance Program (TAP) workload and reserve sufficient funds for that purpose from the total amount available for allocation to the states.
- Apply proportionally the remaining balance available for basic grant allocations to the states for that fiscal year.

The proportion will be calculated by dividing the remaining balance available by the total estimated state basic grant allocations for that fiscal year. The proportion resulting from that calculation will be applied to each state’s estimated basic grant allocation to calculate the amount to be awarded.

Because the annual VETS appropriation for the JVSG has been relatively flat over many years, the amount available to allocate to the states has not kept pace with basic cost of living increases. To allow minimum funding states to maintain a very basic level of grant-funded staff, the minimum funding level may be increased above the calculated minimum at the discretion of the ASVET. In FY 2012, the minimum formula funding for an individual state (excluding Guam and the Virgin Islands that receive a basic level of funding) will be \$550,000 which is more than the amount calculated using the criteria above.

8.2.3 Incentive Award Funding

An amount equal to one percent (1%) of the amount of each state's formula allocation is available to states for "the purposes of making cash awards under the program of performance incentive awards..."

The JVSG Incentive Award Program exists to:

- Encourage the improvement and modernization of employment, training and placement services for Veterans; and to
- Recognize the efforts of eligible employees for excellence in how they provided such services or for having made demonstrated improvements in providing services to Veterans.

VETS describes the criteria for acceptable Incentive Award Plans in [guidance](#) issued to states. The program provides flexibility to states, allowing them to recognize individual employees, groups, and/or entire One-Stop offices. Recipients are not limited to just JVSG funded staff – any individual who provides employment and training services to Veterans under the Workforce Investment Act (WIA) of 1998, labor exchange staff funded by the Wagner-Peyser Act or staff of One-Stop partner agencies are eligible for incentive awards. Volunteers, VA Work Studies, and Federal employees are prohibited from receiving these grant funds.

VETS policy allows for a variety of awards to accommodate different state laws and union agreements. Non-monetary awards to individuals such as t-shirts, ball caps, plaques and trophies were determined to be insufficient to constitute Incentive Awards. Even with the flexibility allowed in law and policy, some states choose not to develop Incentive Award plans and others are prohibited from doing so by state law or union agreements.

States are required to describe Incentive Award Plans in the State Plan. To be approved, the State Plan must describe:

- The objectives of the Incentive Award Plan;
- Eligible recipients of the awards;
- Selection criteria for the awards;
- The awards themselves;
- The timeline that will be used to select recipients, make awards and report the use of Incentive Award funds; and
- The means for disbursement.

States with approved Incentive Award Plans must submit a detailed annual Incentive Award Report listing:

- All awards made to individuals to include the recipient's name, office, and award amount or value; and

- All awards made to offices to include the office location and award amount or value.

Because VETS requires states to request all individual program funding in amounts rounded to the nearest thousand, the amount set aside for each state for incentive awards is rounded to the nearest thousand. States are notified of the amount set aside in the VPL that transmits the annual grant funding estimates. Upon approval of a state's Incentive Award Plan, this funding is included in the annual Notice of Grant Award within the state's LVER grant award.

8.2.4 Transition Assistance Program (TAP) Funding

TAP was authorized by P.L. 101-510 in 1991 to allow the provision of employment and training information to separating Service Members. The intent of the program is to assist covered service members as they make career decisions regarding retention in the military or reintegration within the civilian workforce. TAP Employment Workshops are available to armed forces members and their spouses up to twelve (12) months prior to separation and up to two years (24 months) prior to planned retirement. These workshops have been shown to successfully ease the initial transition from military service to the civilian workplace. TAP Employment Workshops are facilitated by professionally-trained staff from the state employment agency, most of whom are DVOP specialists or LVER staff or through contractor staff. All employees who facilitate workshops must receive required TAP facilitator training from NVTI.

State grantees that elect to facilitate TAP Employment Workshops may currently request funding in addition to the annual formula-derived allocation. The amount of funding requested is based on the number of workshops projected by the TAP site manager or equivalent. In accordance with [the current MOU](#), all TAP Employment Workshops should be two and a half (2 ½) days in length. State grantees are allowed to request funding for up to 24 hours per workshop. The additional half-day is allowed to support the facilitator's planning and preparation time.

8.2.5 Special Initiative Funding

Short-term funding for Special Initiatives may be available for states that submit "unique or innovative" proposals for *allowable* programs or services for Veterans. Special Initiative funding covers a specified period of time with no expectation that it will be continued or re-approved for subsequent timeframes. DVETs will provide necessary technical assistance to states in the development of, planning for, and proposals to support any Special Initiatives.

Assignment of state personnel to a temporary Federal position under the Intergovernmental Personnel Act (IPA) is considered a Special Initiative. The two primary uses of IPA contract staff are assignments to the VETS National Office to assist with program operation and as Regional Recovery and Employment Assistance Lifelines (REALifelines) Coordinators. Funding requests for all Special Initiatives will be submitted as a stand-alone modification to the State Plan that:

- Demonstrates and describes the scope of the program;
- Provides an understanding of the need for the proposed services and planned activities; and
- Indicates the expected quantifiable outcomes of the proposal.

Because twelve-month IPA contracts typically span two fiscal years and funding is not available to support other Special Initiatives on October 1st of the new fiscal year, states are encouraged to request enough funding for the first fiscal year to cover forecast costs through the end of the 5th quarter (December 31st). This allows the position(s) to be funded without interruption that might otherwise occur due to non-availability of funding.

8.2.6 Reallocation of Funding

Fiduciary duty is a legal relationship of confidence or trust between two or more parties, most commonly a *fiduciary* and a *principal* or beneficiary. In a grant fiduciary relationship, one entity (the grantor) places good faith confidence and trust in another (the grantee) whose resources and services are sought in some matter. In such a relationship, both parties should act at all times to achieve the purposes and goals of the grant.

VETS has a fiduciary responsibility to:

- Ensure the maximum amount of grant dollars possible is made available to recipients (state agencies) through the formula allocation process;
- Clearly state the purpose of the grant funds and outcomes expected of recipient agencies;
- Approve State Plans only when they meet the requirements of legislation, regulation and policy;
- Provide reporting mechanisms that allow the Agency to closely monitor use of grant funds to ensure recipients adhere to their approved State Plan, use generally accepted accounting principles to report expenditures, charge “fair share” costs in accordance with plans approved by the [Division of Cost Determination](#), and develop approvable plans for unobligated funds each quarter;
- Monitor program and fiscal activities of state agencies through analysis of quarterly reports, desk audits, and on-site validation reviews; and
- Reallocate unobligated funds in a timely manner to ensure grant funds are used to enhance employment of Veterans and are not returned to the U.S. Treasury unspent.

8.2.6.1 GOTR Technical Assistance

As the GOTR, the DVET will provide all necessary technical assistance needed to help state agencies develop effective fiscal plans that are the most advantageous to Veterans and other eligible persons served. Throughout the fiscal year, the DVET/GOTR will monitor fiscal reports to ensure they are accurate and that the state is spending according to their approved Budget Plan.

Thirty (30) days following the end of each FFY quarter, states are required to provide fiscal reports to the DVET/GOTR. The remaining reports and program analysis summaries (e.g., Technical Performance Narrative) are due forty-five days following the end of each FFY quarter. When unobligated funds are reported, the DVET/GOTR will provide technical assistance to help the state develop a viable plan to expend the unused funding in a manner that will improve employment outcomes for Veterans. The DVET/GOTR will follow the most recently issued [guidance](#) on the subject of JVSG recurring reports to submit an analysis to the RAVET. In this analysis, the DVET/GOTR must identify any unobligated funds that remain with the state and:

- Explain why the surplus exists;
- Describe any future plans the state has to obligate the unused funds for an allowable purpose, i.e. maintain staffing in remaining quarters, conduct training conferences, make computer upgrades, etc.; and
- Provide a recommendation as to whether or not the state should maintain control of the funds or if VETS should reallocate those funds for another purpose.

8.2.6.2 RAVET Actions

The RAVET will complete a thorough review of all reallocation recommendations in accordance with the most recently issued [guidance](#) on the subject of JVSG recurring reports. The RAVET will consult with the DVET/GOTR if he/she has any questions or concerns. After a complete analysis, the RAVET will concur or non-concur with the DVET/GOTR's recommendation based solely on optimal use of grant funding for Veterans nationally. In other words, even though a state may develop a plan to use all unobligated funding, the RAVET must determine if it best serves Veterans overall or might be used more effectively by another state with a pending modification request. The RAVET forwards the recommendation regarding all or part of each state's unobligated funding to the VETS National Office and Jobs for Veterans National Lead Center via the Regional rollup report. When a decision is made to reallocate, the VETS National Office and the Jobs for Veterans National Lead Center take the actions necessary to reduce a future allocation to the state by the amount of unobligated funds not approved for retention by the state.

8.2.6.3 How Reallocations are Effected

Reallocation is typically effected by reducing the funding provided with the next NOA issued. The amount of unobligated funding identified for reallocation is subtracted from the next allocation for that program or sub-program. For example, if a GOTR identifies and the RAVET recommends \$20,000 of a state's unobligated DVOP funds for reallocation based on the second quarter report (period ending March 31st and reported to the GOTR by May 15th) \$20,000 of funds would be subtracted from the DVOP section of the next NOA issued. Since the decision to reallocate was made during the third quarter, the reduction would be indicated on the NOA issued for the fourth quarter (period ending September 30th). Unobligated grant funds remaining beyond the fourth quarter and carried into "fifth quarter" are subject to reallocation from the subsequent fiscal year's funding by reducing the second quarter NOA unless the state submits a 5th quarter

pending plan with the third quarter report and the RAVET subsequently approves the plan.

8.2.7 Allowable and Unallowable Costs

The comprehensive rules used to determine whether or not specific grant expenditure is allowable can be found in [2 CFR, Part 225](#). Final determination on whether or not a particular cost is allowable depends on interpretation of those regulations.

DVET/GOTRs may answer basic questions on allowability from their State. If the question is complicated, VETS field staff should refer the question to the Regional Office or advise the state to get the answer from their Regional Division of Cost Determination representative.

8.3 JVSG Planning and Application Instructions

Full guidance for State Plan development is issued every five years by VETS. Because the JVSG is awarded non-competitively to all states, a Solicitation for Grant Applications is not needed to notify potential grantees of the funding opportunity. Instead, the five-year lifecycle begins with the issuance of [JVSG Planning and Application Instructions](#) transmitted to states via VPL and posted in the Federal government's grant site, www.grants.gov. The planning guidance outlines the criteria for an approvable State Plan. Even though State Plans are approved for five Federal fiscal years, states receive funding in five separate annual grant awards. The DVET in each state should be very familiar with the planning guidance to enhance his or her ability to provide technical assistance to State Agencies.

The 5-year planning guidance provides grantees with detailed information on eligible applicants, the grant period, application requirements and due dates, standards of performance, grant-funded staff assignment and responsibilities, etc. The [General Grant Provisions](#) that apply to all DOL grants are typically provided. The [Special Grant Provisions](#) that are unique to the JVSG are usually provided with the planning guidance as well.

The five-year planning guidance describes what the [State Plan](#) must contain for the state to receive JVSG funding. As such, it is the primary instrument used to transmit prioritized goals and objectives for grant fund usage, such as the Agency's priorities for targeting certain categories of Veterans. It also provides information needed to submit an annual Budget Plan for the first fiscal year of funding.

Unless superseded or rescinded, the goals, objectives, and requirements spelled out in the planning guidance will apply to all future funding requests and modifications submitted during the 5-year grant period. Therefore, the planning guidance must be specific enough to ensure grantees meet statutory and policy requirements, but have enough flexibility to allow for differences in state processes, organization structures, population demographics and changing economic conditions.

Even though VETS approves the 5-year State Plan, funding is only awarded for one fiscal year at a time as noted above. Therefore, each year, upon receipt of the next fiscal year's funding allocation target, each state must review its State Plan and submit an [Annual Funding Modification Request](#). At a minimum, the request will contain the budget forms needed to request funding, but it may also contain changes to the scope of the State Plan itself. Upon approval, the Annual Funding Modification Request modifies the approved State Plan and is incorporated into the grant file as appropriate.

In addition to the Annual Funding Modification Request, states may submit other requests to modify their approved State Plan throughout the fiscal year. These [interim modifications](#) may be used to request additional funding, move funding between the programs to which funds were awarded, or change the scope of services provided to Veterans by the state agency, DVOP specialists and LVER staff.

Each type of grant application or modification is discussed in more detail in the paragraphs that follow. The table below summarizes the documents and forms currently needed for each submission:

	5-Year State Plan	Annual Funding Modification Request	Interim Modification Request
<u>Transmittal Memorandum</u>	Required	Required	Required
<u>State Plan (Narrative)</u>	Required	Amendments, if applicable	Amendments, if applicable
<u>Assurances/Certifications Signature Page</u>	Required	Only if agency administering grant is new	Only if agency administering grant is new
<u>SF 424M (Application for Federal Assistance)</u>	Required	Required	Required if modification affects funding
<u>VETS 401 (Budget Information Summary)</u>	Required	Required	Required if modification affects funding
<u>VETS 501 (Staffing Directory)</u>	Required	Required	Required only if modification proposes staffing changes
<u>VETS 601 (TAP Employment Workshop Forecast)</u>	Required only if TAP funding requested	Required only if TAP funding requested	Required only if modification proposes TAP workshop schedule changes
<u>Indirect Cost Documentation</u>	Required	Attestation	Not Required

8.3.1 Transmittal Memorandum

The Transmittal Memorandum must be signed by a person authorized to enter into an agreement with the USDOL. Under normal circumstances, governors delegate this signature authority to the person who manages the grantee agency, i.e. State Agency Administrator, Director, Commissioner, etc. This person may further designate his or her signature authority. If the Transmittal Memorandum is signed by the person given signature authority by the governor, it must contain a statement that the signatory is authorized to enter into an agreement with the USDOL. If it is signed by someone else, a delegation of signature authority must be provided. The Transmittal Memorandum cannot be signed “for” another person unless the name of the person who signed can easily be discerned and a signature delegation for that person is provided.

All funding requests must include a Transmittal Memorandum that conveys:

- An indication that the person signing the Transmittal Memorandum is authorized to enter into agreement with the Department of Labor
- An assurance that the state will comply with 38 U.S.C., Chapters 41 and 42;
- The number of full-time and half-time DVOP specialists and LVER staff the state has determined can be fully supported by the allocation amount. If there is a difference between the numbers listed in the transmittal memorandum when compared to those listed in the Staffing Directory, the transmittal memorandum will contain an explanation for the difference;
- A brief summary of proposed changes (referenced by the page number of the document being amended) to the approved State Plan;
- An assurance that the Central Services Cost Allocation Plan or Negotiated Indirect Cost Rate is the same used in the most current approved plan, or that the appropriate cost methodology documentation is included; and if applicable
- A description of any equipment (with a useful life of more than one year and a per-unit cost of \$5,000 or more) that would be purchased if forecast spending is approved.

8.3.2 The Program Plan

The JVSG is a multi-year formula program grant that is used to pay for specialized staff to serve targeted categories of Veterans. Annual funding for each state is determined by a formula, described in [section 8.2.1](#). In accordance with [38 U.S.C. § 4102A\(c\) \(2\) \(A\)](#):

“A state shall submit to the Secretary an application for a grant or contract under subsection (b)(5). The application shall contain the following information:

- (i) A plan that describes the manner in which the state shall furnish employment, training, and placement services required under this chapter for the program year, including a description of --

(I) duties assigned by the state to Disabled Veterans' outreach program specialists and local Veterans' employment representatives consistent with the requirements of sections 4103A and 4104 of this title;

(II) the manner in which such specialists and representatives are integrated in the employment service delivery systems in the state; and

(III) the program of performance incentive awards described in section 4112 of this title in the state for the program year.

(ii) The Veteran population to be served.

(iii) For each employee of the State who is assigned to perform the duties of a Disabled Veterans' outreach program specialist or a local Veterans' employment representative under this chapter –

(I) the date on which the employee is so assigned; and

(II) whether the employee has satisfactorily completed such training by the National Veterans' Employment and Training Services Institute as the Secretary requires for purposes of paragraph (8).

(iv) Such additional information as the Secretary may require to make a determination with respect to awarding a grant or contract to the state.”

Typically the State Plan is a narrative description of the Veterans' population that will be served by the grantee or state agency, how priority of service is provided to Veterans, performance goals for the state agency and for grant-funded staff, and overall spending forecasts. The State Plan also details the challenges faced by Veterans in the State and by the state agency and how those challenges will be addressed. Grantees are expected to develop goals and strategies that are consistent with USDOL 'Common Measures and VETS JVSG grant-based performance measures.

As described in [section 8.2.3.](#), one percent (1%) of the amount of each state's formula allocation is available for Performance Incentive Awards. Incentive Award Plans must meet the criteria set forth in the [most current guidance](#) on the subject. Grantees that request Incentive Award funding must submit a plan that meets the criteria set forth in VETS policy guidance and receive approval before selecting awardees or distributing Incentive Awards.

8.3.3 Grant Assurances and Certifications

The Department of Labor will not award a grant or cooperative agreement if the potential grantee fails to accept the required assurances and certifications contained in the planning guidance. When submitted, the [Assurances and Certifications Signature Page](#) must be signed by an authorized signatory as described for the Transmittal Memorandum above. By signing and returning the Signature Page, the state accepts the following:

- Assurances - Non-Construction Programs;
- Certifications Regarding Lobbying, Debarment, Suspension, and Other Responsibility Matters;
- Certifications Regarding Drug-Free/Tobacco-Free Workplace Requirements; and
- Certifications Regarding Release of Information.

The state is required to submit a new [Assurances and Certifications Signature Page](#) any time the state agency administering the JVSG changes during the 5-year grant cycle, even if the change is in name only. **Note:** The State Workforce Agency is not necessarily the exclusive agency that operates the Jobs for Veterans State Grant within every state.

This Signature Page is not a delegation of signature authority nor is it required when there is change in designated signature authority(s).

8.3.4 The Annual Budget Plan

The Annual Budget Plan should demonstrate how the state will distribute allocated funding between the DVOP and LVER programs, how many FTE will be funded in each program, and how the allocation will be distributed during the fiscal year. Current versions of all forms that are needed to complete the plan are provided to the states electronically in Microsoft Excel. The [SF 424M \(Application for Federal Assistance\)](#), [VETS 401 Budget Information Summary](#), [VETS 501 Staffing Directory](#), and if applicable, [VETS 601 TAP Employment Workshop Forecast](#), contain standardized information and locked cells where no entry of information is needed. Grantees may also be required to submit Indirect Cost documentation from the Division of Cost Determination as part of the Annual Budget Plan.

The Annual Budget Plan demonstrates the planned use of allocated funding by identifying:

- The number of half-time and full-time DVOP and LVER positions the allocation will support;
- How the allocation will be divided between the DVOP, LVER, and if applicable TAP programs; and
- Whether or not Incentive Award funding is requested.

8.3.4.1 Staffing Directory

The [VETS 501 Staffing Directory](#) contains all staffing information needed by VETS for monitoring and reporting. When completed properly, this directory ensures that states identify:

- All locations where full- and half-time DVOP specialists and LVER staff are assigned as a primary duty location, to include central and sub-state offices, by office name and address;

- All staff, whether funded in whole or in part by the grant, by name, position (DVOP or LVER), and type of appointment (half-time or full-time);
- All staff funded through a Special Initiative or by grant funding to provide functional oversight, regional coordination or other supervisory/managerial responsibilities by name, title, and location;
- Dates of appointment to current position (DVOP or LVER); and
- All vacancies and all positions filled by non-Veterans for more than six months.

8.3.4.2 Budget Forms

The [Application for Federal Assistance, SF 424 - Mandatory \(SF 424M\)](#) is a form used to request Federal granting provided under formula grants such as the JVSG. VETS requires states to use the VETS 401, Budget Information Summary to forecast grant costs that are not detailed on the SF 424M. The SF 424M must be completed in accordance with the instructions provided with the form. It must be signed by a proper signatory as described for the Transmittal Memorandum above. The total amount of funding requested on the SF 424M must cross-walk to the total amount requested on the VETS 401 Budget Information Summary.

The [VETS 401 Budget Information Summary](#) demonstrates how the grantee plans to divide its grant allocation between JVSG funded programs and how much of the total funding is needed each FFY quarter. Cost estimates for DVOP Activities, LVER Activities, TAP, certain DVOP and LVER Special Initiatives, and Incentives will be broken out as either Direct or Indirect. Direct costs are listed by object class category in accordance with instructions provided to complete the form.

In accordance with [2 CFR, Part 225](#):

“Direct costs are those that can be identified specifically with a particular final cost objective.”

In the JVSG, direct costs are those that can be directly related to individual DVOP specialist or LVER staff. The Object Class Categories associated with direct costs are:

Personnel: Costs for salaries, wages, and overtime forecast for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Fringe Benefits: Costs forecast for fringe benefits provided for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Travel: Costs forecast for program related travel for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Equipment: Costs forecast to purchase non-expendable personal property that has a useful life of more than one year and a per-unit cost of \$5,000 or more. A description

and justification for equipment purchases must be included in the state's Transmittal Memorandum when applicable.

Supplies: Costs forecast for consumable supplies and materials to be used during the project period (including but not limited to computers/laptops and other electrical or electronic equipment) with a per-unit cost of less than \$5,000

Other (Direct): The sum of the separate amounts for:

- Program related staff training;
- Performance Awards and Incentives in accordance with the State Plan (will total up to one percent of the state's combined DVOP and LVER allocation); and
- All other direct costs not clearly covered by the object class categories listed above.

Indirect costs are incurred for common or joint objectives that cannot be readily identified with a particular grant, contract or other activity of the organization. Based on the cost principles established 2 CFR, Part 225, states support the indirect costs that they incur by submitting an Indirect Cost Rate proposal or a Cost Allocation Plan to the Division of Cost Determination for negotiation and approval.

8.3.4.3 TAP Employment Workshop Forecast

State Agencies may request funds to facilitate Transition Assistance Program (TAP) Employment Workshops that are in addition to the annual funding allocation provided by VETS. When funding in addition to the allocation is requested, the number and location of workshops these funds will support will be listed on the [VETS 601 TAP Employment Workshop Forecast](#). VETS will compare the cost per workshop forecast to private contractor costs. If the forecast costs are excessive, further justification will be needed and the funding request may be disapproved.

When the state agency elects to provide facilitators for TAP Employment Workshops, it assumes responsibility for ensuring the staff are properly trained by NVTI and are qualified to conduct effective job search workshops. Facilitators should meet the following criteria:

- Possess good presentation skills;
- Be willing to travel;
- Get along well in individual and group settings;
- Look professional, be well groomed; and
- Adjust well to change.

DVETs should coordinate with all responsible partners to schedule workshops, ensure availability of adequate facilities, equipment and materials, and coordinate guest speakers if utilized.

DVOP specialists, LVER staff, and other state employees who facilitate TAP Employment Workshops may charge the actual number of hours spent on facilitation to the JVSG, but under no circumstances will the amount charged exceed 24 hours per workshop. States may charge Direct and Indirect Costs to TAP in accordance with the most current [guidance on cost allocation](#).

The hourly costs for state employees who facilitate TAP Employment Workshops should be comparable to what is charged to the JVSG for the same staff person performing other duties, i.e. if a grantee projects a DVOP specialist cost at \$40/hour, the rate when facilitating TAP should be comparable after consideration of reasonable travel and related costs.

In accordance with the requirements of the grant, the same cost entries cannot be recorded in more than one grant activity to avoid duplicate charges. For example, the hours charged for an LVER to facilitate a TAP Employment Workshop must be recorded only as “TAP” costs and may not also be entered as “LVER” costs.

When conducting TAP Employment Workshops, half-time grant-funded staff should charge the number of hours spent facilitating to the TAP time code, not to exceed 24 hours per workshop. The balance of their work week, up to 20 hours, may also be charged to the DVOP or LVER time code as appropriate.

Full-time state employees who facilitate TAP Employment Workshops cannot charge a full 40 hours that week to their normal activity. The time spent (up to 24 hours) facilitating a TAP Employment Workshop is charged to the TAP time code and the remainder to the other program assigned, LVER, DVOP, Wagner-Peyser, etc. The advantage of using full-time staff to facilitate TAP Employment Workshops for the state is the ability to use the funds not charged to the grant to subsidize other grant-funded staff. DVOP specialists and LVER staff may provide disabled transition assistance program or DTAP services, but if so, this is part of their normal program responsibilities funded under DVOP or LVER Activities as applicable. Travel funds, may be charged to the JVSG if needed, in the same manner they would be charged for other “outreach” activities.

8.3.5 GOTR Technical Assistance

The DVET, as the GOTR, should provide technical assistance to the state agency as it develops its State Plan and Annual Budget Plan. Even though the JVSGs are offered non-competitively, grantees must meet and comply with all provisions of Title 38, Chapters 41 and 42, the General and Special Grant Provisions, OAMB Circular A-87, and all applicable regulations and policies.

DVETs should work closely with their state agencies to help them create State Plans that clearly demonstrate the added value of the DVOP specialists and LVER staff funded by the grant. Because Federal funding for employment programs is limited and becoming more so every year, state grantees must be reminded that their grant is intended to locate those Veterans and other eligible persons most in need, provide them with intensive

services to become ready for employment, to prepare them for career changes, to market Veterans to employers, and to provide job development services that benefit both employers and Veterans. The DVET's input could be particularly helpful as the state agency develops certain parts of their plan such as:

- Strategies that best serve Veterans needs throughout the state;
- Optimal staffing plans for offices or regions, especially when resources are limited;
- Plans to target specific categories of Veterans such as REALifelines participants, transitioning incarcerated Veterans, homeless Veterans and those at risk of becoming homeless, etc.;
- Outreach and out-stationing plans; and
- Employer marketing and outreach strategies.

VETS provides a [Review Checklist](#) to assist DVETs and RAVETs as they review draft and final requests submitted by the state agencies. DVETs are encouraged to share the checklist with the state agency early in the process to assist them in preparing the funding request.

The DVET should fully understand the State Plan to ensure the state agency fulfills the requirements for priority service to Veterans. Additionally, the state agencies need to understand how the DVET, serving as the GOTR, will monitor the delivery of these services.

8.3.6 Grant Review

All requests for funding receive three levels of review; the DVET/GOTR, regional or RAVET review, and National JVSG Team Review. DVETs accomplish a detailed review of the draft and final requests after becoming familiar with all instructions provided to the state via VPL and to VETS staff via DM. They complete the Review Checklist and DVET Review Summary provided. Throughout the entire process, DVETs will provide technical assistance as needed to ensure the state agency submits a final request by the due date. After all action items identified for correction and/or explanation have been cleared, the DVET forwards the request to the appropriate RAVET.

Any discrepancy or item noted during the DVET/RAVET review that may require consideration or action by the VETS National Office must be sent forward to the Jobs for Veterans National Lead Center and VETS National Office as soon as discovered. Proposed actions that may warrant special consideration include, but are not limited to:

- A major realignment staffing such as changing all grant-funded staff to DVOP specialists or LVER staff;
- A request to use grant-funded staff to manage resource rooms or other common areas where they would also serve non-Veterans;

- A request to change the Agency that will administer the JVSG; or
- A request to convert large numbers of grant-funded staff to half-time vs. full-time.

RAVETs will review State Plans and forward all electronic and hard copy documents to the Jobs for Veterans National Lead Center and VETS National Office as directed in the current guidance.

A National Review Team does the final check on all State Plans. This team completes a final review of the request using the following ground rules:

- Each request is reviewed by two members;
- A member cannot review submissions from states in his/her own region;
- Members must maintain the integrity of the signed original and copies;
- When the review is complete, the original request and all working copies, review checklists, and findings are provided to the VETS National Office; and
- The VETS National Office will verify team findings if applicable and notify the state, through appropriate VETS personnel via email.

DVETs and RAVETs are asked to make themselves available the week(s) the National Reviews are completed to answer any questions that might arise and request information or changes from their states' agencies as appropriate. Under normal circumstances state agencies are given two weeks to make required changes, provide additional documentation, or provide requested explanations.

8.3.7 Grant Award

After the National Team Review completes their review and prior to October 1st, the Jobs for Veterans National Lead Center and VETS National Office finalize the grant packages and prepare them for the Grant Officer. After October 1st and upon enactment of a Department of Labor appropriation, the Grant Officer prepares a Notice of Grant Award that is sent to the official authorized to operate in each state with a copy to the DVET and RAVET. The grant award package includes a transmittal letter, a description of the scope of the grant approved and a copy of the Special Grant Provisions. This notice is the formal, legal grant award. Although the grant award letter approves the multi-year State Plan, it only provides funding for the first fiscal year.

Upon notification that the grant has been awarded, the DVET/GOTR may schedule a post-award conference to review the [Special Grant Provisions](#), [General Grant Provisions](#), and any other terms specified in the Grant Award. The Post Award Conference should be used as a technical assistance tool that can help ensure the effective and efficient conduct of the grant and improve grant outcomes.

In the event an appropriation has not been enacted by October 1st, and the President signs a Continuing Resolution (CR) bill, grantees continue to operate under the previous year's grant award and will be provided enough funding to cover each CR period.

In both situations, new grant award and one or more CR periods, funding is made available for drawdown by the state agencies in the Health and Human Services Payment Management System (HHS/PMS). The HHS/PMS provides a clearinghouse type arrangement with Federal Agencies and their grantees to permit the electronic storage of Federal funds that may be accessed and drawn down remotely by grantees. The Jobs for Veterans National Lead Center and VETS National Office provide the funding amounts to the Regional Offices to prepare and distribute the Notice of Obligation Authority (NOA) to grantees. The NOA is sent to the grantee and to the appropriate DVET. It identifies the funding period covered and the amount of funding available for DVOP, LVER, and TAP.

8.4 Annual Funding Modifications

Even though VETS approves the grantees' 5-year State Plan, funding awards are only for one fiscal year as noted above. Therefore, each year, upon receipt of the next fiscal year's funding allocation target, each state agency must review its State Plan and submit an [Annual Funding Modification Request](#). DVETs work closely with their state agency as it prepares the Annual Funding Modification Request. The Annual Funding Modification Review Checklist provided to assist DVETs and RAVETs in their review should be shared with each state agency early in the process to assist them in preparing their funding request.

At a minimum, the request will contain the fiscal forms needed to request funding, but it may also contain changes to the scope of the State Plan itself. Upon approval, the annual funding request modifies the approved State Plan and is incorporated into the grant file as appropriate.

8.4.1 Transmittal Memorandum

All funding requests must include a Transmittal Memorandum that conveys:

- An assurance that the grantee will continue to comply with 38 U.S.C., Chapters 41 and 42;
- The number of full-time and half-time DVOP specialists and LVER staff the state agency has determined can be fully supported by the annual allocation amount. If there is a difference between the numbers listed in the transmittal memorandum when compared to those listed in the Staffing Directory, the transmittal memorandum will contain an explanation for the difference;
- A brief summary of proposed changes (referenced by the page number of the document being amended) to the approved State Plan or a statement indicating there are no proposed changes to the State Plan;
- As assurance that the State Agency has an approved, or has submitted for approval, a Cost Allocation Plan or Negotiated Indirect Cost Rate;
- If applicable, a description of the equipment (with a useful life of more than one year and a per-unit cost of \$5,000 or more) that would be purchased if forecast spending is approved; and
- A description and justification for costs related to DVOP/LVER training conferences, meetings or other related activities to be charged directly to the JVSG.

The Transmittal Memorandum for the Annual Modification Request must be signed by a person authorized to enter into an agreement with the USDOL. Under normal circumstances, governors delegate this signature authority to the person who manages the grantee agency, i.e. State Agency Administrator, Director, Commissioner, etc. This person may further designate his or her signature authority. If the Transmittal

Memorandum is signed by the person given signature authority by the governor, it must contain a statement that the signatory is authorized to enter into an agreement with the USDOL. If it is signed by someone else, a delegation of signature authority must be included with the funding request. It cannot be signed “for” another person unless the name of the person who signed can easily be discerned and a signature delegation for that person is provided.

8.4.2 Changes to Scope of Approved Plan

States review their JVSG State Plans each year to determine if changes are needed to improve service and outcomes. Information provided in the State Plan narrative must be sufficient to explain and justify all costs forecast in the Annual Budget Plan.

The State Plan should clearly describe the provision of services to Veterans, transitioning Service Members (TSMs) and other eligible persons. Since service delivery strategies may need modification in order to adapt to special client needs or changing labor market conditions, states may amend their plan narratives to reflect any changes to the scope of work or for the addition of new initiatives to serve Veterans.

When changes are made to the previously approved State Plan, states should not submit copies of the entire document. Instead, they should provide the language that is being replaced, added, and/or deleted and specifically reference the page number of the most recently approved State Plan that is being changed. If no changes to the plan narrative are needed, the annual JVSG application transmittal memorandum must include a statement to that effect.

The amount allotted for Incentive Awards is equal to one percent (1%) of the annual state grant allocation as calculated by DOL. States may submit Incentive Award Plans for any year during the 5-year grant cycle even if none was submitted in response to the state planning guidance. Approved plans may be amended and submitted for approval as well.

8.4.3 Grant Assurances and Certifications

A new [Assurances and Certifications Signature Page](#) is required any time the state agency administering the JVSG changes during the 5-year grant cycle, even if the change is in name only. This Signature Page is not a delegation of signature authority, nor is it required when there is change in designated signature authority(s).

8.4.4 The Annual Budget Plan

The Annual Budget Plan should demonstrate how the grantee will distribute allocated funding between the DVOP and LVER programs, how many FTE will be funded in each program, and how the allocation will be distributed during the fiscal year. Current versions of all forms that are needed to complete the plan are provided to the states electronically in Microsoft Excel.

To make completing JVSG budget forms easier, the [SF 424M \(Application for Federal Assistance\)](#), [VETS 401 Budget Information Summary](#), [VETS 501 Staffing Directory](#), and

[VETS 601 TAP Employment Workshop Forecast](#) forms are pre-filled with standardized information and locked cells where no entry of information is needed. States may also be required to submit Indirect Cost documentation received from or provided to the Division of Cost Determination as part of the Annual Budget Plan.

The Annual Budget Plan demonstrates the planned use of allocated funding by identifying:

- The number of half-time and full-time DVOP and LVER positions the allocation will support;
- How the allocation will be divided between JVSG funded programs, i.e. DVOP, LVER, and if applicable, TAP; and
- Whether or not Incentive Award funding is requested.

8.4.4.1 Staffing Directory

The [Staffing Directory \(VETS 501\)](#) is required for all Annual Budget Plans. The form contains all staffing information needed by VETS for monitoring and reporting. When completed properly, this directory ensures that states identify:

- All locations where full- and half-time DVOP specialists and LVER staff are assigned as a primary duty location, to include central and sub-state offices, by office name and address;
- All staff, whether funded in whole or in part by the grant, by name, position (DVOP or LVER), and type of appointment (half-time or full-time);
- All staff funded through a Special Initiative or by grant funding to provide functional oversight, regional coordination or other supervisory/managerial responsibilities by name, title, and location;
- Dates of appointment to current position (DVOP or LVER); and
- All vacancies and all positions filled by non-Veterans for more than six months.

8.4.4.2 Budget Forms

The [Application for Federal Assistance, SF 424 - Mandatory \(SF 424M\)](#) is a form used to request Federal granting provided under formula grants such as the JVSG. VETS requires states to use the VETS 401, Budget Information Summary to forecast grant costs that are not detailed on the SF 424M. The SF 424M must be completed in accordance with the instructions provided with the form. It must be signed by a proper signatory as described for the Transmittal Memorandum above. The total amount of funding requested on the SF 424M must cross-walk to the total amount requested on the VETS 401 Budget Information Summary.

The [Budget Information Summary \(VETS 401\)](#) demonstrates how the grantee plans to divide its grant allocation between JVSG funded programs and how much of the total funding is needed each FFY quarter. Cost estimates for DVOP Activities, LVER Activities, TAP, certain DVOP and LVER Special Initiatives, and Incentives will be

broken out as either Direct or Indirect. Direct costs are listed by object class category in accordance with instructions provided to complete the form.

In accordance with 2 CFR, Part 225:

“Direct costs are those that can be identified specifically with a particular final cost objective.”

In the JVSG, direct costs are those that can be directly related to individual DVOP specialist or LVER staff. The Object Class Categories associated with direct costs are:

Personnel: Costs for salaries, wages, and overtime forecast for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Fringe Benefits: Costs forecast for fringe benefits provided for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Travel: Costs forecast for program related travel for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Equipment: Costs forecast to purchase non-expendable personal property that has a useful life of more than one year and a per-unit cost of \$5,000 or more. A description and justification for equipment purchases must be included in the state’s Transmittal Memorandum when applicable.

Supplies: Costs forecast for consumable supplies and materials to be used during the project period (including but not limited to computers/laptops and other electrical or electronic equipment) with a per-unit cost of less than \$5,000

Other (Direct): The sum of the separate amounts for:

- Program related staff training;
- Performance Awards and Incentives in accordance with the State Plan (will total up to one percent of the state’s combined DVOP and LVER allocation); and
- All other direct costs not clearly covered by the object class categories listed above.

Indirect costs are incurred for common or joint objectives that cannot be readily identified with a particular grant, contract or other activity of the organization. Based on the cost principles established in 2 CFR, Part 225, states support the indirect costs that they incur by submitting an Indirect Cost Rate proposal or a Cost Allocation Plan to the Division of Cost Determination for negotiation and approval.

8.4.4.3 TAP Employment Workshop Forecast

State Agencies may request funds to facilitate Transition Assistance Program (TAP) Employment Workshops that are in addition to the annual funding allocation provided by VETS. When funding in addition to the allocation is requested, the number and location of workshops these funds will support will be listed on the [TAP Employment Workshop Forecast \(VETS 601\)](#). VETS will compare the cost per workshop forecast to private contractor costs. If the forecast costs are excessive, further justification will be needed and the funding request may be disapproved.

When the state agency elects to provide facilitators for TAP Employment Workshops, it assumes responsibility for ensuring the staff are properly trained by NVTI and are qualified to conduct effective job search workshops. Facilitators should meet the following criteria:

- Possess good presentation skills;
- Be willing to travel;
- Get along well in individual and group settings;
- Look professional, be well groomed; and
- Adjust well to change.

DVETs should coordinate with all responsible partners to schedule workshops, ensure availability of adequate facilities, equipment and materials, and coordinate guest speakers if utilized.

DVOP specialists, LVER staff, and other state employees who facilitate TAP Employment Workshops may charge the actual number of hours spent on facilitation to the JVSG, but under no circumstances will the amount charged exceed 24 hours per workshop. States may charge Direct and Indirect Costs to TAP in accordance with the most current [guidance on cost allocation](#).

The hourly costs for state employees who facilitate TAP Employment Workshops should be comparable to what is charged to the JVSG for the same staff person performing other duties, i.e. if a grantee projects a DVOP specialist cost at \$40/hour, the rate when facilitating TAP should be comparable after consideration of reasonable travel and related costs.

In accordance with the requirements of the grant, the same cost entries cannot be recorded in more than one grant activity to avoid duplicate charges. For example, the hours charged for an LVER to facilitate a TAP Employment Workshop must be recorded only as “TAP” costs and may not also be entered as “LVER” costs.

When conducting TAP Employment Workshops, half-time grant-funded staff should charge the number of hours spent facilitating to the TAP time code, not to exceed 24 hours per workshop. The balance of their work week, up to 20 hours, may also be charged to the DVOP or LVER time code as appropriate.

Full-time state employees who facilitate TAP Employment Workshops cannot charge a full 40 hours that week to their normal activity. The time spent (up to 24 hours) facilitating a TAP Employment Workshop is charged to the TAP time code and the remainder to the other program assigned, LVER, DVOP, Wagner-Peyser, etc. The advantage of using full-time staff to facilitate TAP Employment Workshops for the state is the ability to use the funds not charged to the grant to subsidize other grant-funded staff. DVOP specialists and LVER staff may provide disabled transition assistance program or DTAP services, but if so, this is part of their normal program responsibilities funded under DVOP or LVER Activities as applicable. Travel funds, may be charged to the JVSG if needed, in the same manner they would be charged for other “outreach” activities.

8.4.5 GOTR Technical Assistance

DVETs should provide technical assistance to the state as they conduct the annual review of the State Plan to ensure it continues to meet all guidelines established in legislation, regulation and policy. States may/should amend their plan narratives annually to reflect any changes to the scope of work, addition of new programs, or adoption of new initiatives to serve Veterans. When changes are made, states should NOT submit copies of the entire plan: they should provide the language that is being replaced, added, and/or deleted and reference the page number of the original document being changed.

A [Modification Review Checklist](#) is provided to assist DVETs (and RAVETs) as they review both draft and final Annual Funding Modification Requests. DVETs should share this checklist with the state early in the process to assist them in preparing the funding request. Additionally, a [DVET Review Summary](#) is provided as a management tool and is to be completed by each DVET to help them determine if the forecast spending for each object class category is reasonable and if the cost per position for grant-funded staff and the cost per TAP workshop (if applicable) are reasonable when considering the impacts of pay raises, increases in the costs of benefits, rescissions in other DOL funded programs, etc.

At any point in the review process, the Annual Funding Modification Request may be returned to the state, via the DVET/GOTR, if there are corrections to be made or issues in need of clarification. To avoid or minimize this possibility, the DVET/GOTR should provide all technical assistance necessary to ensure a complete and accurate application package.

8.4.6 Annual Modification Request Review

All requests for funding receive three levels of review; the DVET/GOTR, RAVET, and National Team Review. Using guidance provided in an annual [VPL](#), states submit an annual modification request to the DVET for review and analysis. Using the additional guidance provided in a [DM](#), the DVET forwards the application package with his or her recommendation after all action items identified for correction and/or explanation have been cleared.

Any discrepancy or item noted during the DVET/RAVET review that may require consideration or action by the VETS National Office must be sent forward to the Jobs for Veterans National Lead Center and VETS National Office as soon as discovered.

Proposed actions that may warrant special consideration include but are not limited to:

- A major realignment staffing such as changing all grant-funded staff to DVOP specialists or LVER staff;
- A request to use grant-funded staff to manage resource rooms or other common areas where they would also serve non-Veterans;
- A request to change the Agency that will administer the JVSG; or
- A request to convert large numbers of grant-funded staff to half-time vs. full-time.

The Regional Office reviews the modification request and forwards it to the Jobs for Veterans National Lead Center and VETS National Office as directed in the current guidance.

A National Review Team is formed each year to complete a final review of the request using the following ground rules:

- Each request is reviewed by two members;
- A member cannot review submissions from states in his/her own region;
- Members must maintain the integrity of the signed original and copies;
- When the review is complete, the original request and all working copies, review checklists, and findings are provided to the VETS National Office; and
- The VETS National Office will verify team findings if applicable and notify the State, through appropriate VETS personnel via email.

At any point in the review process, it is possible that the JVSG modification request will be returned to the applicant, via the DVET/GOTR, if there are corrections to be made or issues in need of clarification. To avoid or minimize this possibility, the DVET/GOTR should provide all technical assistance necessary to ensure a complete and accurate modification request is prepared prior to, rather than after, the due date for submittal.

DVETs and RAVETs are asked to make themselves available the week(s) the JVSG National Reviews are completed to answer any questions that might arise and request information or changes from their states, as appropriate. Under normal circumstances states are given two weeks to make required changes, provide additional documentation, or provide requested explanations.

8.4.7 Annual Funding Modification Approval

After the National Team Review completes their review and prior to October 1st, the Jobs for Veterans National Lead Center and VETS National Office finalize the grant packages and prepare them for the Grant Officer. After October 1st and upon enactment of a

Department of Labor appropriation, the Grant Officer prepares a Notice of Grant Award that is sent to the official authorized to operate in each state with a copy to the DVET and RAVET. The grant award package includes a transmittal letter, a description of the scope of the grant approved and a copy of the Special Grant Provisions. This notice is the formal, legal grant award. Although the grant award letter approves the multi-year State Plan, it only provides funding for the first fiscal year.

Upon notification that the grant has been awarded, the DVET/GOTR may schedule a post-award conference to review the [Special Grant Provisions](#), [General Grant Provisions](#), and any other terms specified in the Grant Award. The Post Award Conference should be used as a technical assistance tool that can help ensure the effective and efficient conduct of the grant and improve grant outcomes.

In the event an appropriation has not been enacted by October 1st, and the President signs a Continuing Resolution (CR) bill, grantees continue to operate under the previous year's grant award and will be provided enough funding to cover each CR period.

In both situations, new grant award and one or more CR periods, funding is made available for drawdown by the state agencies in the Health and Human Services Payment Management System (HHS/PMS). The HHS/PMS provides a clearinghouse type arrangement with Federal Agencies and their grantees to permit the electronic storage of Federal funds that may be accessed and drawn down remotely by grantees. The Jobs for Veterans National Lead Center and VETS National Office provide the funding amounts to the Regional Offices to prepare and distribute the Notice of Obligation Authority (NOA) to grantees. The NOA is sent to the grantee and to the appropriate DVET. It identifies the funding period covered and the amount of funding available for DVOP, LVER, and TAP.

8.5 Interim (or Mid-year) Modifications

During a fiscal year, states may identify a need to amend the scope of their State Plan, the number or assignment of DVOP specialists or LVER staff needed to support grant goals or the funding levels that support the staffing levels contained in the approved State Plan. States may also identify a need to request additional funding to support a Special Initiative or respond to exigencies. Any significant changes to the cost, scope, or conditions of a JVSG require Grant Officer (GO/National Office) approval. Therefore, under any of the above circumstances, grantees are required to request a modification via the DVET and RAVET, and must receive approval from the Grant Officer prior to implementing the proposed changes. Grantees should first consult their DVET to determine whether a particular situation requires a modification to their approved State Plan.

In accordance with the [current guidance](#), modifications to the JVSG may be submitted as a completely separate request simultaneously with the annual funding request or at a later date during the FFY. When changes are made to the State Plan, grantees should NOT submit copies of the entire plan: they should provide the language that is being replaced, added, and/or deleted and reference the page number of the original document being changed.

All modification requests must be received in the VETS National Office at least forty-five (45) days before the quarter in which the grantee is requesting the changes to become effective. Interim modification requests cannot be processed until Annual Funding Modification Requests are processed and signed by the Grant Officer. All requests for additional funding will be held for consideration in the order received, prioritized, and approved if and when funds become available. Grantees must clearly describe all costs associated with the requested modification and the expected quantifiable outcomes. Requests for additional funds will be considered to cover exigencies such as, but not limited to, national or state disasters, unanticipated fluctuations in state unemployment levels or a need to provide workshops or direct services to large numbers of TSMs. Approval or disapproval will be based on the merit of the request and the availability of funding for reallocation.

8.5.1 Transmittal Memorandum

The transmittal memorandum with original signature of an authorized agency representative should include a clear description of the changes requested in the modification to include intended results, particularly how the targeted category of Veterans or TSMs will benefit. It should also include an assurance that all fiscal year funding, including any additional funding received as a result of the approved modification, will be obligated by the December 31st following the end of the current FFY.

Additional funding can be requested to support more than one initiative or project and each request has a different priority when considered for approval. Since each portion of

the request will be considered separately based on its merit, need, and availability of funding, the transmittal memorandum must clearly show:

- The amount of the total request that would be used for each purpose; and
- The quarter(s) in which the funds for each purpose would be expended or obligated.

8.5.2 Changes to Scope of Approved Plan

Once a State Plan has been approved by the Grant Officer, the terms of the Plan are to be followed. Those terms include the numbers of DVOP specialists and LVER staff employed, assigned physical locations of grant-funded staff, number of other individuals such as the State Veterans' Programs Coordinator (or Veterans' Coordinator) that may directly charge time to the grant, approved training conferences, etc. If at any time during the fiscal year the grantee desires to deviate from the approved plan, an interim modification request is necessary. This includes changes to the approved State Plan that may not require any fiscal changes (i.e. no-cost modification requests).

8.5.2.1 Requests for Additional Funding

Grantees may, at any time, request additional funding from VETS through an interim modification request. Additional funding can be requested for a number of different purposes such as training conferences, increased staff costs for approved levels of DVOP specialists and LVER staff, increased numbers of DVOP specialists or LVER staff to respond to exigencies, Special Initiatives, or to make Incentive Award funds available when not previously requested.

Grantees may request funding for Special Initiatives - unique or innovative proposals for programs or services for Veterans. Special Initiative funding covers a specified period of time with no expectation that it will be continued or re-approved for subsequent timeframes. Funding for Special Initiatives is in addition to that provided in the annual allocation. DVETs will provide necessary technical assistance to state agencies in the development of any Special Initiative proposal. Assignment of state personnel to temporary federal positions under the Intergovernmental Personnel Act (IPA) for VETS program purposes are also funded as Special Initiatives.

Special Initiatives are requested as stand-alone modifications to the State Plan and must:

- Demonstrate and describe the scope of the program;
- Provide an evaluation of the need and benefit of the proposed services and planned activities; and
- Indicate the expected quantifiable outcomes (or return on investment) of the proposal to show the initiative is financially responsible.

When a DVET/GOTR receives a modification request for additional funding, he or she should review the request using the [current guidance](#) provided to ensure completeness,

accuracy, feasibility, and adherence to policy and guidance. Any errors or omissions noted by the DVET should be corrected before the request is forwarded to the RAVET.

After a thorough review of the modification request in accordance with the most recently issued review guidance, the DVET/GOTR should provide an analysis of the request. The analysis should clearly identify the objectives of the modification request and should identify the costs of those objectives. Using this analysis, the DVET should make a written recommendation to the RAVET as to whether or not the request should be approved. The recommendation should be clearly supported by the analysis.

Regional Office staff will review Interim Modification requests, identify whether or not they concur with the DVET's recommendation and forward all electronic and hard copy documents to the Jobs for Veterans National Lead Center and VETS National Office as directed in the current guidance.

8.5.2.2 Requests to Shift Funding

Employment conditions may change during the five-year grant period and states may need to change approved State Plans to accommodate those changes and meet the needs of Veterans served by grant-funded staff. A grantee could find that a reduction in LVER staff and an increase in DVOP staff (or vice versa) may better suit the climate of the employment needs of the Veterans being seen in local offices or areas. In order to accomplish this, the state must submit an interim modification request and wait for approval from the Grant Officer before initiating the change. Although the request may seem insignificant, VETS must have the opportunity to review the proposed change and either approve or disapprove the requested changes.

If the changes are approved by the Grant Officer, an NOA will be issued to the grantee to reflect the decrease of funds in one program and equal increase in the other. At that time funds available for drawdown in the HHS/PMS will also reflect the revised totals for each program.

8.5.2.3 Non-Funding Requests

Not all interim modification requests involve funding. Some modification requests relate to how the grantee intends to deliver services to Veterans, grant-funded staff office locations, changes in the primary duties of grant-funded staff (i.e. out-stationing to VA VR&E), or other cost-neutral actions. Although JVSG funds may not be impacted by such proposals, it is still necessary for the grantee to submit an interim modification request to receive approval and effect the change.

DVET/GOTRs will review the cost-neutral modification requests in the same way as other requests involving the addition or transfer of grant funds. However, the emphasis of the review shifts to the expected positive outcomes expected by the changes. As in the case with other modification requests, VETS staff at the state and region will provide an analysis and recommendation for approval or disapproval to the Jobs for Veterans National Lead Center and VETS National Office.

8.5.3 Grant Assurances and Certifications

The grantee is required to submit a new [Assurances and Certifications Signature Page](#) any time the state agency administering the JVSG changes during the 5-year grant cycle, even if the change is in name only. This Signature Page is not a delegation of signature authority nor is it required when there is change in designated signature authority(s).

8.5.4 Revised Budget Plan

If the interim modification request affects the approved Budget Plan, a revision must be submitted that demonstrates how the grantee will distribute the revised funding between the DVOP and LVER programs, how many FTE will be funded in each program, and how the allocation will be distributed during the remainder of the fiscal year. Current versions of all forms that are needed to complete the budget modification are provided to the grantees electronically in Microsoft Excel.

To make completing JVSG budget forms easier, the [SF 424M \(Application for Federal Assistance\)](#), [VETS 401 Budget Information Summary](#), [VETS 501 Staffing Directory](#), and [VETS 601 TAP Employment Workshop Forecast](#) forms are pre-filled with standardized information and locked cells where no entry of information is needed. States may also be required to submit Indirect Cost documentation received from or provided to the Division of Cost Determination as part of the revised Budget Plan.

The revised Budget Plan demonstrates the planned use of allocated funding by identifying:

- The number of half-time and full-time DVOP and LVER positions the allocation will support;
- How the allocation will be divided between the DVOP, LVER, and if applicable TAP programs; and
- Whether or not Incentive Award funding is requested.

8.5.4.1 Staffing Directory

The [Staffing Directory \(VETS 501\)](#) contains all staffing information needed by VETS for monitoring and reporting. This form is required for Interim Modification requests, if the proposal makes changes to number or approved assignment of grant-funded staff. If needed, this directory ensures that states identify:

- All locations where full- and half-time DVOP specialists and LVER staff are assigned as a primary duty location, to include central and sub-state offices, by office name and address;
- All staff, whether funded in whole or in part by the grant, by name, position (DVOP or LVER), and type of appointment (half-time or full-time);
- All staff funded through a Special Initiative or by grant funding to provide functional oversight, regional coordination or other supervisory/managerial responsibilities by name, title, and location;

- Dates of appointment to current position (DVOP or LVER); and
- All vacancies and all positions filled by non-Veterans for more than six months.

8.5.4.2 Budget Forms

The [Application for Federal Assistance, SF 424 - Mandatory \(SF 424M\)](#) is a form used to request Federal granting provided under formula grants such as the JVSG. VETS requires states to use the VETS 401, Budget Information Summary to forecast grant costs that are not detailed on the SF 424M. The SF 424M must be completed in accordance with the instructions provided with the form. It must be signed by a proper signatory as described for the Transmittal Memorandum above. The total amount of funding requested on the SF 424M must cross-walk to the total amount requested on the VETS 401 Budget Information Summary.

The [VETS 401 Budget Information Summary](#) demonstrates how the grantee plans to divide its grant allocation between JVSG funded programs and how much of the total funding is needed each FFY quarter. Cost estimates for DVOP Activities, LVER Activities, TAP, certain DVOP and LVER Special Initiatives, and Incentives will be broken out as either Direct or Indirect. Direct costs are listed by object class category in accordance with instructions provided to complete the form.

[OMB Circular A-87](#), Attachment A, states:

“Direct costs are those that can be identified specifically with a particular final cost objective.”

In the JVSG, direct costs are those that can be directly related to individual DVOP specialist or LVER staff. The Object Class Categories associated with direct costs are:

Personnel: Costs for salaries, wages, and overtime forecast for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Fringe Benefits: Costs forecast for fringe benefits provided for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Travel: Costs forecast for program related travel for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Equipment: Costs forecast to purchase non-expendable personal property that has a useful life of more than one year and a per-unit cost of \$5,000 or more. A description and justification for equipment purchases must be included in the state’s Transmittal Memorandum when applicable.

Supplies: Costs forecast for consumable supplies and materials to be used during the project period (including but not limited to computers/laptops and other electrical or electronic equipment) with a per-unit cost of less than \$5,000

Other (Direct): The sum of the separate amounts for:

- Program related staff training;
- Performance Awards and Incentives in accordance with the State Plan (will total up to one percent of the state's combined DVOP and LVER allocation); and
- All other direct costs not clearly covered by the object class categories listed above.

Indirect costs are incurred for common or joint objectives that cannot be readily identified with a particular grant, contract or other activity of the organization. Based on the cost principles established in [2 CFR, Part 225](#), states support the indirect costs that they incur by submitting an Indirect Cost Rate proposal or a Cost Allocation Plan to the Division of Cost Determination for negotiation and approval.

8.5.4.3 TAP Employment Workshop Forecast

States may request additional funding to facilitate TAP Employment Workshops for any year during the 5-year grant cycle, even if none was submitted in response to the initial planning guidance. The [TAP Employment Workshop Forecast \(VETS 601\)](#) must be included in an interim modification request only if the state is requesting changes to the most current, approved number and/or scope of TAP Employment Workshops. The VETS 601 contains cells for all necessary information needed for supporting funding requests and DVET monitoring/reporting. Grantees must identify each location, days and hours by quarter; so that VETS has the basis to favorably consider any proposed changes, which must also meet the requirements spelled out in the most current guidance issued regarding TAP funding requests.

8.6 Performance Measures and Negotiating Goals

8.6.1 Legislation

[Title 38 United States Code, Section 4102A](#) (38 U.S.C. 4102A)

8.6.2 Other References

[ET 406 Handbook](#), expiration date March 31, 2012;

[VPL 03-11](#), Negotiating Performance Goals for Service to Veterans for Program Year 2010, dated June 30, 2010;

[TEGL 29-10](#), Negotiating Performance Goals for the Workforce Investment Act Title 1B Programs and Wagner-Peyser Act Funded Activities for Program Year 2011;

[TEGL 5-09](#) -- Reporting Guidance and Instructions for the Workforce Investment Act (WIA), Section 166, Indian and Native American (INA) Supplemental Youth Services Program, Including Performance Accountability Reporting for the American Recovery and Reinvestment Act (Recovery Act) of 2009 dated September 4, 2009; and

[TEGL 17-05 Change 2](#), Common Measures Policy for the Employment and Training Administration (ETA) Performance Accountability System and Related Performance Issues, dated February 17, 2006.

8.6.3 ET Handbook 406

The [ET 406 Handbook](#) details the data collection and reporting process to support labor exchange performance measurement within the context of partner program performance measurement systems. The five handbook sections comprising the ETA 9002 reporting instructions are divided into three distinct areas:

- Services (ETA 9002 A and B);
- Outcomes (ETA 9002 C and D); and
- Job Openings Received (ETA 9002 E).

Reporting requirements for employment services and performance outcomes of the state - administered, federally-funded Wagner-Peyser Act program are contained in this Handbook. Data reported on the ETA 9002 A, 9002 B, 9002 C, 9002 D, and 9002 E reports plus the VETS 200A, 200B, and 200C reports are comprised of information compiled from the state's management information system, which contains information on job seeker characteristics, services provided to participants, and job orders. Additionally, data is obtained through matching information on job seekers with employment outcome information obtained from unemployment insurance (UI) wage records, the state Directory of New Hires (SDNH) database, or other automated sources.

Appendices A, B and C of the ETA 406 Handbook contain the report formats, data element specifications, and report calculation specifications needed to prepare these reports.

8.6.4 ETA 9002 Reports

Wagner-Peyser Act funded services are reported on the ETA 9002A for all participants and on the 9002B for participants who are Veterans, eligible persons, or TSMs. The ETA 9002C and D follow this sequence by separately capturing the employment outcomes resulting from the provision of employment services for all individuals who exit from Wagner-Peyser (ETA 9002 C) and exiters who are Veterans, eligible persons, or TSMs (ETA 9002 D).

8.6.5 VETS 200 Reports

The VETS 200 Reports are a subset of the ETA 9002 reports data. The data reported contain similar elements as the ETA 9002, but only apply to the activities of participants who received one or more services from DVOP specialists and/or LVER staff. This enables VETS to evaluate the outcomes of the more intensive services offered to participants under these two programs. The VETS 200 reports are the:

- VETS 200A, Services/Outcomes by DVOP specialists;
- VETS 200B, Services/Outcomes by LVER staff; and
- VETS 200C, Unduplicated Count of Services/Outcomes Provided by DVOP/LVER staff.

8.6.6 Common Measures

As mandated by 38 U.S.C. 4102A, the ASVET has established and implemented a performance accountability system to measure the effectiveness of services provided to Veterans by the One-Stop Career Center System. Current guidance quantifies the effectiveness of the state agency's employment delivery system in meeting the needs of Veterans, TSMs and other eligible persons seeking employment. To fulfill its statutory monitoring and oversight role, VETS issues [guidance](#) that establishes national goals that reflect high, positive employment outcomes for Veterans and are achievable by the cumulative efforts of the state grantees. There is an expectation that state agencies will set goals high enough to be challenging and to contribute to the National goals, but still achievable. If a state agency falls short of their negotiated goals, VETS may take action to remedy the situation.

8.6.6.1 Public Labor Exchange Measure

States are expected to use the performance accountability system to develop strategies and policies that demonstrate continuous improvement. The following performance goals will be negotiated with the State Workforce Agency for One-Stop/Labor Exchange employment and workforce information services delivered to Veterans:

- Veterans' Entered Employment Rate (EER)
- Veterans' Employment Retention Rate (ERR)
- Veterans' Average Earnings (AE)
- Disabled Veterans' EER
- Disabled Veterans' ERR
- Disabled Veterans AE

8.6.6.2 Grant-Based Measures

Target values will be negotiated with each State Workforce Agency for the four performance measures addressing the outcomes experienced by the two subgroups of Veterans targeted to be served by DVOP specialists and LVER staff consistent with the guidance in [VPL 07-10](#), Refocused Roles and Responsibilities of Jobs for Veterans State Grant Funded Staff, dated June 29, 2010:

DVOP (Data Source: VETS-200A):

- Disabled Veterans Entered Employment Rate (EER) (following Staff Assisted Services)
- Disabled Veterans Employment Retention Rate (ERR)
- LVER (Data Source: VETS-200B):
- Recently Separated Veterans EER (following Staff Assisted Services)
- Recently Separated Veterans ERR

Target values also will be negotiated for the three performance measures addressing outcomes experienced by Veterans served by DVOP specialists and/or LVER staff measured on a consolidated basis (i.e., based on the unduplicated results included in the VETS-200 C Report):

Consolidated DVOP/LVER (Data Source: VETS-200C):

- Veterans EER (following Staff Assisted Services) – Weighted (see section below)
- Veterans ERR
- Veterans AE

8.6.6.3 Weighted Performance Goal

The measure to be weighted is the consolidated Entered Employment Following Staff Assisted Services Rate for Total Veterans and Eligible Persons (Row 19, Column C on the VETS-200 C Report). The weighting is implemented by adjusting the value for that measure based on the Entered Employment Following Intensive Services Numerator (Row 20, Column C on the VETS-200 C Report). [Attachment 3 of VPL 03-11](#) identifies the data elements and calculations involved in weighting the EER for a sample State based on the number of Veterans entering employment following receipt of intensive

services. That attachment also identifies shortened titles for the three reported data items that are applied to calculate the weighted EER. The steps to calculate a weighted EER are presented below, with the numeric values from Attachment 3 appearing in parentheses:

1. Identify the Veterans Numerator (1,025).
2. Identify the Veterans Denominator (1,450).
3. Identify the Entered Employment Following Staff Assisted Services Rate (71%) *for informational purposes only*.
4. Identify the Veterans Receiving Intensive Services Numerator (210).
5. Calculate the Veterans Receiving Intensive Services Weighting Factor: Multiply the Veterans Receiving Intensive Services Numerator (210) by 0.25 to calculate the Veterans Receiving Intensive Services Weighting Factor (53*).
6. Calculate the Weighted Veterans Numerator: Add the Veterans Receiving Intensive Services Weighting Factor (53) to the Veterans Numerator (1,025) to calculate the Weighted Veteran Numerator (1,078).
7. Calculate the Weighted Veterans EER: Divide the Weighted Veterans Numerator (1,078) by the Veterans Denominator (1,450) to calculate the Weighted Veteran EER (74%), rounded to the nearest whole number or percent.

An automated form for calculating this measure using VETS-200 reports is provided as an attachment to the most recent guidance on the subject of negotiating performance goals.

Weighting the EER for Veterans based on the number of Veterans that received Intensive Services is intended to give extra credit for the time and effort it takes to serve harder to serve Veterans. It is also meant to serve as an incentive for states to focus efforts on the legislatively mandated role of DVOP specialists.

Under this approach to weighting, every four Veterans who enter employment after receiving intensive services make a contribution to the weighted EER that is equal to the contribution made to that measure by five Veterans who enter employment without receiving intensive services. So, the successful outcomes of four Veterans who received intensive services generate the same credit for a state as the successful outcomes of five Veterans who did not receive intensive services.

8.6.7 Negotiating Goals with State Agency(s)

Performance accountability is a key component of the information system used to manage the efficacy of the workforce investment system. State agencies should use the negotiation of goals as an opportunity to encourage innovation that shows continuous improvement in the provision of services to Veterans, TSMs, and other eligible persons.

Negotiation for each One-Stop goal can be based on comparable, historical data reported by the state agencies on the ETA 9002D Quarterly Report on Performance Outcomes for Veterans, Eligible Persons and TSMs, as well as how those outcomes compare to the National performance goals for the appropriate PY. Performance levels for each of the six outcomes are negotiated separately. For any proposed outcome that is less than the National goal, negotiations should strive to set a goal that shows as much positive improvement toward meeting the national targets as possible. When recently reported outcomes exceed the national targets, negotiations should be geared toward positive improvement that will enhance the potential for collectively attaining the national goals.

Negotiation of the two outcomes for DVOP specialists will be based on the historical performance data reported by the grantee on the VETS 200A DVOP Quarterly Report. Negotiation of the two outcomes for LVER will be based on the historical data reported by the grantee on the VETS 200B LVER Quarterly Report for the same periods. Negotiation of the three consolidated outcomes for DVOP/LVER will also be based on the historical data reported by the grantee on the VETS 200C for the same periods. Each of the seven grant-based outcomes listed above will be negotiated separately. Negotiations should strive for target outcome rates that demonstrate positive improvement above what was reported for the previous 12-month period.

8.6.7.1 Coordination with ETA Negotiations

State agencies may negotiate performance goals with the DVETs at the same time they are negotiating performance goals for a variety of USDOL programs with their ETA Federal Project Officers (FPOs). RAVETs are encouraged to meet with their counterparts from ETA to encourage joint or collaborative negotiations between DVETs and assigned FPOs with their respective State Agencies. Geographic location of the DVETs and FPOs may affect the level of cooperative effort that is achievable. However, collaborative negotiations can be useful for the states in reducing a duplication of effort, but also useful for the DVETs and FPOs in eliciting a consistency of expectations across USDOL grants programs. DVETs should be aware of ETA's most current guidance to the states regarding performance negotiations. This guidance may include an explanation of ETA's methodology for assessing performance against negotiated goals which differs from that of VETS. For example, in the most recent [TEGL](#), ETA advised states that its assessment methodology would include criteria for exceeding, meeting or failing to meet performance goals based on certain percentages of achievement. In this ETA methodology, a state will be considered to have met a performance goal if the actual performance achieved falls in the range of 80-100% of the negotiated level of performance for the measure. Since VETS has not adopted a similar methodology, state agencies may tend to be more conservative in the performance goals they set for service to Veterans than they would be in other USDOL grant programs administered by ETA.

8.6.7.2 How to Negotiate Goals

The process for negotiating performance goals generally begins in April of each year when VETS issues a VPL promulgating guidance to the state agencies. The state agencies will be advised to submit proposed performance levels to the DVETs in accordance with a [set format](#) outlined in the current VPL. State Agencies are expected to

meet with the respective DVET to negotiate the performance goals. Historical performance data, current labor market information and demographic factors play a key role in developing performance goals. Examples of economic and demographic factors that should be considered when negotiating outcomes are:

- Employment opportunities as affected by the rate of job creation/job loss in the state;
- Trends in state and sub-state unemployment;
- The number of demobilizing National Guard and Reservists in the state; and
- The availability of shared wage records used to report entered employment and retention outcomes.

State Agencies should conduct a thorough analysis of the outcomes reported to date for the current program year and all factors that may impact future performance prior to entering into negotiations with the DVET. DVETs should work closely with their state grantee to develop and implement new strategies if the outcomes for One-Stop services for Veterans are not meeting the national targets, or if the grant-based outcomes for services provided by DVOP specialists and/or LVER staff are below 50%. In those cases, negotiations should include a discussion of various factors that may impact outcomes such as:

- Grant-funded staff utilization rates;
- Targeting services to areas of high unemployment;
- Employer outreach;
- Job development; and
- Staff training, etc.

Any state agency that does not meet one or more of its negotiated goals for a given program year will be required to work closely with the respective DVET during the following twelve months to improve outcomes. During this period of technical assistance, the DVET will be instrumental in assisting the state with exploration of the problems or issues that impact the shortfall, and in recommending improvements designed to improve the state agency's capacity to meet its goals. If needed, a second year of technical assistance can be provided to ensure that the state agency achieves outcomes that are reflective of its economy and that contribute to the National goals. If the deficiency continues at the end of the second year of technical assistance, the DVET, in consultation with the appropriate RAVET, may place the state agency under a Corrective Action Plan (CAP.)

8.6.7.3 Submitting Negotiated Goals

Prior to the date established in the current VPL, State Agencies will submit the proposed performance goal to the respective DVET. State Agencies are encouraged to use the [format](#) provided by VETS to submit their goals. If an alternative format is submitted, it

must include the same information listed in the two tables and must be signed by an approved state signatory(s) if not on agency letterhead.

Once the state grantee and the DVET reach agreement, the DVET will forward a signed copy of the agreed performance levels to the RAVET for review. If the proposed goals are unacceptable, the RAVET may direct the continuation of the negotiation process until mutual agreement is reached. RAVETs will indicate their approval by submitting the final, negotiated performance goals for each state agency, signed by the DVET and the RAVET, to the Jobs for Veterans National Lead Center and the VETS National Office by the established due date. Each signed memorandum will be incorporated into the respective approved State Plan.

8.7 Recurring Reports

The [Special Grant Provisions](#) for Jobs for Veterans Grants outline the performance measures for which the state agencies will be held accountable as part of the JVSG. Grantees are expected to collect, maintain and submit valid, verifiable data that reflect the accomplished activities and expenditure of grant funds. The DVET/GOTR is authorized to review reports and records, monitor progress of the grant, and otherwise make recommendations to the Grant Officer on all grant matters and requests. In accepting the JVSG, the grantee agrees to give the DVET/GOTR access to all grant reports and state records relative to the provision of employment, education and training-related services to Veterans, other eligible persons and TSMs.

The [VPL](#) and [DM](#) on recurring reports provide current requirements on report contents, due dates, review, analysis and distribution. The DVET/GOTR, then, must be familiar with the various reports, records and processes to effectively execute his/her oversight duties and evaluate the grantee's performance in providing employment and training services to Veterans as stipulated in the grant.

These quarterly reports are reviewed and carefully analyzed by the DVET prior to forwarding to the regional office for their review and submission to the Jobs for Veterans National Lead Center and VETS National Office and (See sections [8.8 Fiscal Analysis](#) and [8.9 Evaluating and Improving Performance](#) for detailed information). DVETs are encouraged to schedule quarterly meetings with the State Agency to review their reported obligations and performance outcomes. Open discussions will increase the likelihood that the grantee will complete the year on target with the approved budget plan and performance outcome goals.

8.7.1 Manager's Report on Services to Veterans

38 U.S.C. 4104(e) requires a report on employment and training services provided to Veterans and eligible persons by the local employment service delivery point (SDP) or area. This narrative report is provided to the DVET no later than 45 days following the end of each FFY quarter. The report to the DVET should provide information regarding compliance with Federal law and regulations with respect to special services and priorities for Veterans and eligible persons. The Manager's Quarterly Report on Services to Veterans was developed to meet this requirement by providing a snapshot of Veterans' services at the local office or regional level. The [VPL](#) on Recurring Reporting Requirements provides detailed information on the Manager's report. The following is a list of required content for this report:

Time Period Covered: Fiscal year and quarter.

Office or Area Covered: Name and location or description of SDP or area covered.

Report Author: Name of individual(s) primarily responsible for the preparation and/or submission of the report.

Outreach to Veterans Efforts: Summary of efforts made by grant-funded staff to locate Veterans with barriers to employment, particularly those targeted for specialized services in the State Plan and the results of those efforts.

Case Management/Intensive Services: Provide the:

- Number of Veterans and other eligible persons newly enrolled in case management this quarter.
- Number of Veterans exiting case management this quarter.
- Of the Veterans exiting case management, the number:
 - That entered employment or improved wages.
 - That achieved another successful outcome such as disability or other compensation sufficient to be sole source of income.
 - The number that terminated case management without a successful outcome.

Outreach to Employer Efforts: Summarize outreach efforts to employers and other organizations:

- To promote the hiring of Veterans and other eligible persons and the results of those efforts.
- To inform them of incentives for hiring Veterans such as the Work Opportunity Tax Credit, apprenticeship, and on-the-job training through the GI Bill, etc.
- To develop a job for a specific Veteran or other eligible person.
- For the above job development contacts, provide the number of Veterans who subsequently entered employment.

Priority of Service: Describe how Veterans and covered persons receive priority of service in all Department of Labor funded programs in the SDP or area covered by the report. Specifically:

- How are Veterans and covered persons identified at the point of entry to programs and services?
- How are Veterans and covered persons made aware of:
 - Their entitlement to priority of service?
 - The full array of programs and services available to them? and
 - Eligibility requirements for those programs and/or services?
- How does the SDP or area covered by the report ensure that Veterans and covered persons take precedence over eligible non-covered persons in obtaining services?

Success Stories/Best Practices: Describe any noteworthy successes and/or best practices.

Special Projects: Describe any new or unique grant funded staff projects, accomplishments, or other initiatives undertaken and the results or expected results of these efforts.

8.7.2 TAP Quarterly Report

DVETs report information on TAP Employment Workshops facilitated at all TAP sites within their state each quarter. This information may come from a variety of sources as determined by local policy, e.g. TAP Site Manager, TAP Workshop facilitator, state Veterans' Program Coordinator, etc. Regardless of who provides the information, the data needed for each individual site is:

- State
- Military service branch of the installation
- Military installation name
- Number of workshops facilitated by grant-funded staff
- Number of retiring participants
- Number of separating participants
- Number of spouse participants
- Number of participants from each branch of service
- Number of participants within 90 days of separation
- Number of participants more than 90 days from separation
- Number of workshops facilitated by grant-funded staff
- Number of workshops facilitated by VETS staff
- Number of workshops facilitated by contractors
- Number of workshops facilitated by WAE employees (when actually employed)

When the VOPAR reporting system is available, DVETs will enter quarterly TAP participant information in the automated system as directed in the VOPAR User Guide.

When VOPAR is unavailable, DVETs will enter the quarterly data for their state's TAP sites into the TAP Quarterly Report provided as an attachment to the DM on Recurring Reports. DVETs will forward the completed TAP Quarterly Activity Report to the appropriate Regional Office no later than 30 days following the end of each FFY quarter. The Regional Office will consolidate the reports received, using the same report template, and will forward one consolidated Regional TAP Quarterly Activity Report to the TAP Lead at the National Office. The consolidated report is due in the National Office no later than 10 business days after the DVET deadline.

The TAP Lead will consolidate the Regional reports and maintain the master report. Once VOPAR is again available, the National Office will migrate the data into the

system. When TAP sites need to be added to the TAP Quarterly Report, DVETs will inform the TAP Lead who will add the site to the Report template and to the Master Report.

8.7.3 The VETS 201, VR&E Tracking Report

The VR&E Tracking Report is used to record information on Veterans participating in the Department of Veterans Affairs' Chapter 31 program who are referred to state grantees for labor market information and/or employment services. The information provided on the report is used to track the status of referred participants, referral and registration dates, and outcomes.

Each JVSG recipient is required to designate an Intensive Services Coordinator (ISC) who is responsible for collecting and entering information on all Veterans provided labor market information (LMI) or other services during the VR&E evaluation phase and all VR&E participants determined to be job ready and referred to a One-Stop office or SDP for employment services.

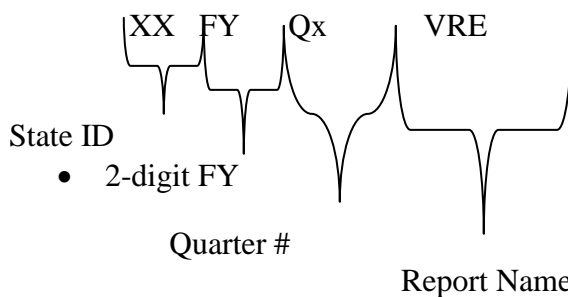
In accordance with the instructions provided with the form, Veterans and other eligible persons will be tracked by the ISC in coordination with VA VR&E staff. During the evaluation phase, potential participants referred to the State Agency for LMI or other services will be recorded on the VR&E Tracking Report, but upon completion of those services, will be "closed" with an "L" closure code to indicate that the State Agency's evaluation phase involvement has ended.

"Job Ready" VR&E participants referred to the state for job search and other employment services are recorded on the report until such time a favorable outcome is achieved or they are no longer monitored by the VA VR&E. Even though the participant may receive services from the state for a long period of time, when the VA VR&E closes a participant's case, a closing date is entered on the VR&E Tracking Report and an appropriate closure code (as determined jointly with VA VR&E staff) is entered. Participants will not be tracked indefinitely even if they are still receiving employment related services from the state. DVETs should review the closure code descriptions contained in the VR&E Tracking Report instructions to ensure participants are closed and coded appropriately.

NOTE: Tracking VA VR&E participants is a joint VA, VETS, and state venture and must be based on common terminology. Therefore, in most cases, the VA VR&E office is the partner that determines when a participant record is closed and the reason for the closure. A VA VR&E participant may enter employment that results in a positive outcome for the One-Stop and/or grant based goals, but only the VA can determine whether or not it is "Suitable Employment" and may close the case as a "Rehabilitation." The state will get credit for all registered VR&E participants that receive services on the ETA 9002 and/or VETS 200. The VR&E Tracking Report will only be used to report outcomes or cases closed as agreed to by VA VR&E staff and the ISC.

Each FFY quarter, the ISC will forward the completed VR&E Tracking Report electronically to the DVET and appropriate VR&E staff no later than 30 days after the last day of the reporting quarter. The DVET, ISC, and appropriate VR&E staff will reconcile the data within five working days of the end of each quarter.

- After reconciliation, the DVET will enter the information contained on the Report worksheet of the VETS 201 workbook into VOPAR and will email the reconciled spreadsheet to vets-vre@dol.gov with a copy to the ISC and appropriate JVSG state staff for inclusion in the JVSG Quarterly Report. A copy will also be sent to the appropriate VA VR&E staff. The following file name protocol will be used for files forwarded to vets-vre@dol.gov:



The following examples depict the correct way to name electronic VR&E Tracking Report files:

Example 1: NY 11 Q2 VRE.xls would be an Excel file submitted by New York that contains the VR&E Tracking Report for the 2nd Quarter of FY 2011.

Example 2: TX 11 Q4 VRE.xls would be an Excel file submitted by Texas that contains the VR&E Tracking Report for the 4th Quarter of FY 2011.

8.7.4 JVSG Quarterly Report

To fulfill legislatively mandated grant oversight requirements, State Agencies are required to submit fiscal, performance and program activity reports for each Federal Fiscal Year (FFY) quarter in which grant funds are obligated or expended. VETS monitors expenditures reported by grantees to ensure funds are spent in accordance with cost principles established for Federal awards to state government agencies as well as approved State Plans.

When authorized by the Department of Labor’s annual appropriation, JVSG funds not obligated by September 30th are allowed to be carried into the first quarter of the next fiscal year or the “5th quarter.” States must carry this funding forward and use it on a First In, First Out (FIFO) basis for staff salaries and expenses.

Prior to obligating carry-in funds for any purpose including staffing, conferences, training, or equipment, states must submit a 5th quarter spending plan to the respective

DVET. States should forecast spending for the remainder of the year at the end of the 3rd quarter and if required, submit a 5th quarter spending plan with the quarterly report due on August 14th. This spending plan must be approved by the RAVET. States may assume the spending plan is approved unless informed otherwise by the DVET prior to September 30th.

Funds not obligated for prior FY purposes and carried over into the first quarter of a new FY must be used on a FIFO basis and must be apportioned to each object class category proportionately with the amount of the next fiscal year's first quarter funds that are obligated. As a simple example, if a state charges a total of \$100,000 to DVOP in the first quarter of which \$20,000 (20%) is "carried in" from the previous fiscal year, 20% of the total costs for salaries, for benefits, for travel, etc. should be charged to the previous fiscal year and 80% to the current fiscal year.

When funds from one or both programs are expended or obligated in the 5th quarter, fiscal reports, completely separate from the concurrent 1st quarter report, must be submitted. These reports will include a FFR for each program in which funds were spent or obligated, an EDR, and a transmittal memorandum that explains how the funds were used.

All states must designate one of the quarterly reports as a "Final" fiscal report for both the DVOP and LVER programs. The Final report for both programs need not be submitted at the same time. The timing for each report is dependent upon the quarter in which the state determines that all obligations for the program are known and have been liquidated. This may occur in the quarter which ends September 30th, in the 5th FY quarter which ends December 31st or the final quarter which ends March 31st of the following year. All fourth quarter and subsequent financial reports must be identified as either final or not final by checking the appropriate boxes on the FFR and EDR.

The Final fiscal report for each program, submitted with a transmittal memorandum, is due to the DVET no later than 30 days after the end of the quarter in which all obligations are liquidated in that program and in all circumstances, no later than April 30th of the following fiscal year. Specifically:

- When all fiscal year obligations are liquidated by September 30th:
 - The 4th quarter report due October 30th can be considered "Final" by checking the appropriate blocks on the FFR entered into E-Grants and on the EDR; or
 - A separate "Final" report is due no later than January 30th of the following fiscal year.
- When all fiscal year obligations are liquidated at the end of the 5th quarter, ending December 31st:

- The 5th quarter report due January 30th of the following fiscal year can be considered “Final” by checking the appropriate blocks on the FFR and EDR; or
- A separate “Final” report is due not later than April 30th of the following fiscal year;
- When funds obligated in the 5th quarter are liquidated in the 2nd quarter of the next fiscal year, states should enter a properly annotated FFR into E-Grants and submit a Final EDR not later than April 30th of the next fiscal year. This is the only circumstance in which states should use the “Final” worksheet in the EDR workbook.

The E-Grants system requires a Closeout Report for all grants. The Closeout Report can only be submitted after the Final Quarter Report has been entered and certified in E-Grants. To access the Closeout Report, select the quarter in which the Final Report was submitted. The cumulative data from the Final Report will be carried forward into the Closeout Report. A new cumulative column will be available to update closeout entries if needed. If data is changed in the Closeout Report, a new Final EDR and transmittal memorandum explaining the changes must be submitted. If no data is changed, entry of the Closeout Report into E-Grants is all that is needed.

8.7.4.1 Report Requirements (Quarters 1-4)

In accordance with the [current recurring report guidance](#), states must submit the following documents for each of the four FFY quarters:

- Technical Performance Narrative (TPN)
- Financial Report:
 - SF 425, FFR (DVOP)
 - SF 425, FFR (LVER)
 - Expenditure Detail Report (EDR), VETS 402A or VETS 402B
- Performance Reports:
 - ETA 9002A - Services To Participants
 - ETA 9002B - Services To Veterans, Eligible Persons and TSMs
 - ETA 9002C - Performance Outcomes-All Exiters
 - ETA 9002D - Performance Outcomes-Veterans, Eligible Persons and TSM
 - ETA 9002E – Job Openings Received by Occupation

- VETS 200A - Services/Outcomes by DVOP Staff
 - VETS 200B - Services/Outcomes by LVER Staff
 - VETS 200C - Unduplicated Counts of Services/Outcomes provided by DVOP/LVER Staff
- Vocational Rehabilitation & Employment (VR&E) Tracking Report, VETS 201
 - Manager's Reports on Services to Veterans

All quarterly reports and associated documents will be identified by state and grant number. States must submit their Financial Report no later than 30 days after the end of each FFY quarter. Performance and Narrative reports are due no later than 45 days after the end of each FFY quarter.

Grantees certify data from the SF 425, FFRs in E-grants no later than 30 days after the end of each FFY quarter. States that receive funding in both the DVOP and LVER programs certify two FFRs – one for each program.

DVETs will enter data from the EDR submitted by the state into the VOPAR system.

8.7.4.2 Report Requirements (5th Quarter)

The 'fifth' fiscal year quarter is simply a period of time congruent with the first quarter of the subsequent fiscal year in which a grantee can still spend or obligate retained surplus funds remaining from the fourth quarter of the previous FY. This carry-over of unobligated fourth quarter funds is generally used by the grantee to maintain continuity in the JVSG during the transition from one fiscal year to the next.

Since spending is reported in the same fiscal year as the funding is provided, 5th quarter obligations must be reported separately from any 1st quarter obligations, even though the funds may go for the same purpose during the same period of time. The 5th quarter report is a fiscal report on obligations of the surplus funding only; performance reported for the timeframe is attributed to the 1st quarter report (following FY). The 5th quarter report will contain:

- Technical Performance Narrative (TPN)
- Financial Report
 - Federal Financial Report (DVOP) (if surplus funding was obligated)
 - Federal Financial Report (LVER) (if surplus funding was obligated)
 - Expenditure Detail Report (EDR) (or alternate format)

The following examples depict what documents are required for different fifth quarter scenarios:

Scenario 1:

The state grantee reports that all DVOP and LVER funds are fully obligated on the 4th quarter report; all DVOP obligations were reported as liquidated and the FFR and EDR are marked “Final,” while a portion of the LVER obligations were unliquidated.

The grantee would be required to submit a 5th quarter report containing a TPN, FFR (LVER) and EDR for the quarter ending December 31st.

Scenario 2:

The state expends all LVER funds in the fourth quarter and marks the corresponding Federal Financial Report (LVER) as “Final.” The fourth quarter Federal Financial Report (DVOP) shows an unobligated balance of \$12,000.

The grantee would be required to submit a fifth quarter report containing a TPN, Federal Financial Report (DVOP) and EDR.

Scenario 3:

The state reports an unobligated balance for both DVOP and LVER at the end of the 4th quarter.

The state must submit 5th quarter reports for both DVOP and LVER – A TPN, FFR (DVOP), FFR (LVER), and EDR. All funds from both programs must be fully obligated by the end of the 5th quarter. If funds are obligated but not liquidated by the end of the 5th quarter, the funds liquidated in the following quarter must be reported for the quarter ending March 31st. Any remaining funds not liquidated will be returned to Treasury.

8.7.5 Technical Performance Analysis Report (TPAR)

The DVET will thoroughly review and analyze all reports and related documents provided by the grantee, including the Annual Incentive Awards Summary Report. The DVET review is critical to ensuring that:

- Funds are expended in accordance with the approved fiscal plan;
- A plan has been developed by the grantee to make up for deficiencies before the end of the fiscal year, whenever the grantee is over-expended in any funding source, i.e. Special Initiatives, TAP or DVOP/LVER Activities;
- A detailed, approvable plan has been developed by the grantee to spend all allocated funds before the end of the funding period (4th quarter or when authorized the 5th quarter) or wishes to have the excess funds reallocated when under-expended in any program;
- The ratio of funds expended for salaries and benefits as a percentage of total outlays (PS+PB/Total) is not more than 2% less than the approved ratio;
- A good faith effort is taken to fill vacancies in a timely manner with qualified Veterans in accordance with statutory priorities;

- Good progress is being made toward meeting the grantee's negotiated performance goals;
- DVOP specialists and LVER staff are fulfilling the separate and distinct statutory roles and responsibilities and operating accordance with current policy guidance;
- DVOP specialists and LVER staff are only serving Veterans and other eligible persons when charging to the JVSG;
- DVOP specialists and LVER staff are fully and effectively integrated into the One-Stop system;
- Priority of service is provided to eligible Veterans in all Department of Labor funded employment and training programs in accordance with VPL 07-09;
- VR&E clients are served by a DVOP specialist or LVER staff when referred by the Department of Veterans' Affairs;
- The cost for grant-funded staff to facilitate TAP Employment Workshops is in line with the State Plan and cost effective for VETS; and
- Issues, problems, best practices, and success stories that may have an impact on the quality of services provided to Veterans are identified by the grantee in the TPN.

While not a comprehensive list, analysis of the state's quarterly report will require the DVET to complete such actions (see sections [8.8 Fiscal Analysis](#) and [8.9 Evaluating and Improving Performance](#) for more detailed information) as are necessary to:

- Verify that the outlays and obligations reported on the previous quarter's fiscal report have not changed;
- Verify that outlays and obligations reported on the EDR are rolled up on the appropriate Federal Financial Report;
- Verify that calculated expenditures, such as those reported in "Cumulative" column are correctly reported on all financial forms;
- Calculate the staff utilization rate (percentage of planed positions filled) by comparing the average Base Positions Paid reported on the EDR to the approved staffing levels;
- Identify newly assigned grant-funded staff and those no longer paid by the grant;
- Calculate the average cost per position for each funding source by dividing the cumulative amount expended in each funding source by the average Base Positions Paid by that funding source;
- Calculate the average cost per TAP Employment Workshop (when applicable) by dividing the cumulative amount expended on TAP by the total number of workshops facilitated by grant funded staff;

- Analyze the percentage of services to non-Veterans by DVOP and LVER staff reported on performance reports;
- Analyze services to Veterans as they compare to services to non-Veterans; and
- Compare the Entered Employment Rates, Employment Retention Rates, and Average Earnings outcomes to negotiated goals and account for variances.

The DVET will submit a TPAR that addresses the issues listed above for the 1st, 2nd, 3rd, and 4th quarters. The TPAR should 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.

Carry-in funds are used to supplement or supplant first quarter funds in accordance a RAVET approved fifth quarter spending plan. Therefore, no analysis is needed regarding staff utilization, cost per position, cost per TAP workshop or performance. When funds are expended in the fifth quarter, the DVET needs to prepare and submit a transmittal memorandum that identifies the amount of any funds obligated to be liquidated in the “final” quarter, or any funds left un-obligated.

After P.L. 109-461 was enacted requiring DVOP specialists and LVER staff to complete specialized training with NVTI, grantees were required to provide the names of all DVOP specialists and LVER staff on their Staffing Directory, provide the dates appointed to their current position, and identify whether or not each had completed the mandatory “core” training. This information was used to create a National database of grant-funded staff that is now maintained and updated by NVTI to forecast future training class requirements. To keep the database current, DVETs are required to report staffing changes identified in the state TPN. This includes all staff persons whose date of appointment to their current position falls within the report quarter and those staff no longer paid by the grant due to relocation, reassignment, retirement etc. When grant-funded LVER staff are reassigned to DVOP specialist positions, and vice versa, they should be considered “Newly Assigned” to their current position and “No Longer” in their previous position for reporting purposes.

8.7.6 Reallocation Recommendations

In the event a grantee has not fully expended or obligated to expend all grant funds by the end of each FFY quarter, the grantee must report those unobligated funds on FFR and EDR for the quarter. These funds may then be identified for reallocation by VETS. Subject to reallocation means that they may or may not be reallocated at a later date in the current fiscal year. When a reallocation occurs, a subsequent quarterly allocation is reduced by a like amount.

The DVET’s comprehensive financial analysis of the DVOP or LVER grant funds is used to make a sound recommendation to the RAVET about what should be done with unobligated funds. Before making a reallocation recommendation the DVET should consider:

- The explanation of why there are surplus funds;
- The grantee's identification of known future expenses and exigencies that could directly support their need to retain some unobligated or unexpended grant funds; and
- Whether or not the grantee's plan to use some or all of those excess funds is acceptable.

The DVET/GOTR must provide the RAVET separate recommendations to reallocate DVOP or LVER funds or not when surpluses exist in both programs. Great care should be taken to ensure that the grantee is not asking to exempt funds in order to accomplish things that might change the scope of the grant. If that is the case, the DVET/GOTR should advise the grantee to submit a modification request to retain and utilize the surplus funds for that reason. All recommendations regarding surplus funds should:

- Identify the amount of funds that should be reallocated;
- Identify the amount of funds that should be exempted from reallocation; and
- Include a fully supported explanation for the reallocation or exemption.

The DVET/GOTR's recommendation in support of or against reallocation of JVSG funds should be clearly explained in the quarterly report's TPAR. The recommendation should be made to the RAVET and provide him or her with sufficient details to make an informed recommendation to the Jobs for Veterans National Lead Center and VETS National Office. The RAVET recommendation is made in the Regional Rollup of reports and will provide evidence in support of his or her recommendation.

8.7.7 Distribution of Reports

Report distribution is described in the [current guidance](#) on reviewing recurring reports. This guidance also provides a standardized naming protocol for electronic files.

8.7.8 Regional Rollup

Each VETS Regional Office is responsible for compiling all of the quarterly reports for states within the region for submission to the VETS National Office as well as the Jobs for Veterans National Lead Center. The rollup consists of four major sections: Fiscal, Performance, Reallocation Recommendation and Staffing Changes.

The regional rollup is designed and formatted in such a way to assist the Jobs for Veterans National Lead Center and VETS National Office, to determine how well grant-funded staff in states are serving Veterans, to identify new DVOP and LVER staff for training needs, to analyze national trends in spending and performance and to advise decision makers about reallocating funds.

8.8 Fiscal Analysis

DVETs provide a comprehensive analysis of the fiscal status of the DVOP and LVER grant funds used and remaining for his or her state agency each quarter. One of the many outcomes of this analysis is an evaluation of how well the state grantee is following its plan. It is imperative that the DVET/GOTR compare the quarterly fiscal report to the grantee's budget plan in order to provide quality technical assistance to the state agency, and also to provide a sound recommendation to the RAVET about what should be done with regard to unobligated funds.

8.8.1 Planned vs. Actual Spending

NOAs provided to state grantees include the amount of funding, by program, available for drawdown from HHS/PMS. The approved VETS 401, Budget Information form is the source document for the initial funding amounts provided on quarterly NOAs. Each NOA specifies the amount of funding previously provided, the net increase or decrease, and the new cumulative amount available for drawdown. While NOAs are normally issued at the beginning of each FFY quarter, they may be issued any other time they are warranted, such as to cover a funding period authorized by a CR or to provide additional funds through a modification approved after the fourth quarter NOA has been issued. The DVET/GOTR should compare the amounts reported on the FFRs and EDR to the corresponding NOAs to determine if the grantee is spending funds in accordance with their approved plan. This information should be used to provide technical assistance as needed to help the state align actual spending with planned spending.

8.8.2 Base Positions Paid (BPP)

BPP are the number of DVOP and LVER positions directly charged to the grant. The BPP should closely reflect the number of positions filled. State accounting systems generally calculate the BPP by comparing the total hours charged to a program code (DVOP, DVOP Special Initiatives, LVER, LVER Special Initiatives, or TAP) to the total hours available for the program if all assigned staff charged every available hour. BPP is reported for each funding source on the EDR and allows the DVET/GOTR to accurately calculate staff utilization rates and cost per position for each funding source.

8.8.3 Staff Utilization

The DVET/GOTR should compare the approved staffing levels (listed in the Transmittal Memorandum or Staffing Directory submitted with the approved State Plan or most recently approved modification, to the current quarterly TPN update to ensure the state is staffing adequately and appropriately.

Note: Calculation of a quarterly staff utilization rate *and* calculation of an YTD staff utilization rate may be needed to effectively evaluate how closely the grantee is following their annual staffing plan:

- To calculate the quarterly utilization rate, use the BPP reported in the “Reported this Quarter” column of the EDR
- To calculate the YTD utilization rate, use the BPP from the “Reported YTD” column of the EDR

Because the JVSG is used to fund DVOP specialists and LVER staff, variations from the approved staffing numbers will negatively impact the state’s spending plan:

- The DVOP or LVER staff utilization rate can be calculated by comparing the actual BPP reported on the EDR to the number of approved positions identified in the Transmittal Memorandum or Staffing Directory submitted with the approved annual funding request or most current, approved modification.
- The reported BPP for TAP may need to be combined with DVOP or LVER, as appropriate, to get an accurate comparison to the approved plan since the positions planned for TAP may not be identified separately on the Staffing Directory.

Since the positions planned and reported for Special Initiatives are identified separately on both the Staffing Directory and the EDR, the utilization rate for staff funded by a Special Initiative can be separately calculated.

Example #1

Staffing Directory from the approved plan shows 14 full-time and 7 half-time DVOP staff or 17.5 full-time equivalent (FTE) positions; and the EDR (Reported this Quarter) shows 15.58 BPP:

- $15.58 \text{ actual positions paid} \div 17.5 \text{ approved planned positions} = 89\%$
DVOP Utilization Rate

In this example, the low utilization rate may lead to surplus funding. The longer the vacancies exist, the greater the surplus leading to funds subject to reallocation. Since the vacancies could have existed anytime during the quarter, the DVET should check the progress of filling them (if not already filled by the time the report is received).

Example #2:

Staffing Directory from the approved plan shows 78 full-time and 4 half-time LVER staff or 80 FTE; and the EDR (Reported Year to Date) shows 86.45 BPP

- $86.45 \text{ actual positions paid} \div 80.0 \text{ approved planned positions} = 108\%$
LVER Utilization Rate

In this example, the state has paid for more positions than approved in their Plan. If not corrected, this situation may lead to a shortage of total funding sometime during the year. Unless a calculation of the quarterly utilization rate shows the state has reduced staffing, it should be encouraged to reduce staff and comply with the approved State Plan. If not, the state may end the FY overspent. As per the special grant provisions, overspending is borne by the State Agency, not VETS.

8.8.4 Cost per Position (CPP)

The CPP is calculated by dividing the aggregate amount expended in each funding source (DVOP, DVOP Special Initiative, LVER, LVER Special Initiative, and TAP) by the BPP paid by that funding source.

Note: When funds from the previous FY were obligated or expended in the 5th quarter, they are included in the aggregate amount of funding expended for the following year. Because funds expended in the 5th quarter only supplement 1st quarter funding, no BPP are attributed to spending during a fiscal year's 5th quarter. All BPP in the 1st quarter are attributed to that quarter and paid by the combination of fifth quarter carry-in and 1st quarter obligations.

You can calculate the quarterly CPP and the YTD CPP. The YTD CPP can be extrapolated to estimate the annual CPP. When compared to the planned amounts, both the quarterly CPP and the estimated annual CPP are useful for analysis.

For the calculation examples below, assume the grantee's approved FY plan reflects the following information for the LVER program:

- **Total forecast for LVER Activities: \$850,000**
- **Total forecast for LVER Special Initiatives: \$79,000**
- **Total forecast for TAP: \$22,000**
- **Total TAP Workshops planned: 24**
- **Total LVER positions forecast: 12.5 FTE**

The forecast CPP for all LVER staff then would be:

- $(\$850,000 + \$79,000 + \$22,000)$ divided by 12.5 FTE = \$76,080 per position

The actual cost per position for each subcategory of DVOP and LVER requires the analysis of the EDR. For the following four examples of CPP calculations, refer to the third quarter EDR below. **NOTE:** Each example is correct for a state that reported no outlays or obligations in the 5th quarter.

Example 1:

Calculate the quarterly CPP (rounded) for all LVER staff:

- $(\$192,549 + \$19,861 + \$5,896)$ divided by $(9.85 + 0.97 + 0.34) = \$19,561$ in the third quarter.

Example 2:

Calculate the YTD CPP for LVER (note use only funds which have been obligated YTD):

- \$654,974 divided by (9.78 + 0.98 + 0.34) = \$59,006 CPP YTD

Example 3:

Estimate the annual CPP for all LVER staff using the third quarter EDR:

- a) \$59,006 divided by 3 (*three quarters to date*) = \$19,669 per quarter (average)
- b) \$19,669 multiplied by 4 (*annualized*) = \$78,676 estimated annual CPP

Example 4:

Compare the estimated annual CPP to the planned CPP to see how close current costs per LVER staff levels are to the planned cost per position.

- \$78,676 estimated annual CPP divided by \$76,080 planned CPP (above)= 103.4%

LVER Expenditures			
12. Base Positions Paid for LVER Activities:	9.74	9.85	9.78
13. Personal Services (PS) for LVER Activities:	\$148,975.23	\$85,239.23	\$234,214.46
14. Personnel Benefits (PB) for LVER Activities:	\$114,589.65	\$41,258.36	\$155,848.01
15. Total Outlays for LVER Activities:	\$385,655.17	\$192,548.74	\$578,203.91
16. Base Positions Paid for LVER Special Initiatives:	0.99	0.97	0.98
17. Personal Services (PS) for LVER Special Initiatives:	\$15,994.26	\$8,651.29	\$24,645.55
18. Personnel Benefits (PB) for LVER Special Initiatives:	\$12,555.38	\$5,251.51	\$17,806.89
19. Total Outlays for LVER Special Initiatives:	\$39,422.81	\$19,861.14	\$59,283.95
20. # TAP Workshops Facilitated by Grant Funded Staff:	12	6	18
21. Base Positions Paid for TAP:	0.34	0.34	0.34
22. Personal Services (PS) for TAP:	\$4,880.23	\$3,012.52	\$7,892.75
23. Personnel Benefits (PB) for TAP:	\$3,015.68	\$1,002.69	\$4,018.37
24. Total Outlays for TAP:	\$11,589.64	\$5,896.36	\$17,486.00
25. Total Outlays for Incentive Awards:			
26. Total Outlays for LVER:	\$436,667.62	\$218,306.24	\$654,973.86
27. Federal Share of LVER Unliquidated Obligations:			
28. Total LVER Fund Outlays and Obligations:	\$436,667.62	\$218,306.24	\$654,973.86

8.8.5 Cost per TAP Workshop

For those states in which grant-funded staff facilitate TAP Employment Workshops, the average cost per TAP Employment Workshop is determined by dividing the total amount spent on TAP by the total number of workshops facilitated by grant-funded staff. The actual cost per workshop should be compared to the planned cost per workshop.

1) Using the same Budget Plan information from the previous example listed above and the assumptions used in the examples above for calculating CPP, you can calculate the planned cost per workshop as:

- \$22,000 approved divided by 24 workshops = \$917 per workshop

2) The actual cost per workshop using the EDR year-to-date (YTD) is:

- \$17,486 divided by 18 actual workshops to date = \$971 per workshop

3) The comparison of actual cost per workshop to planned cost per workshop is:

- \$971 actual cost per workshop to date divided by the \$917 planned per workshop = 105.89% or a higher than planned cost per workshop.

8.8.6 Unliquidated Obligations

Unliquidated obligations are funds that have been obligated, but not yet ‘expensed’ by the state. In other words, they are bills that have been incurred, but not yet paid. For example, a state agency may order laptop computers for grant-funded staff in one quarter, but the payment may not be made until the supplies (*computer equipment with a per unit cost of under \$5,000 are considered ‘supplies’*) are actually delivered in the following quarter. The funds will be obligated in the quarter they were ordered and reflected as “Unliquidated Obligations” in the appropriate section of the EDR and on the corresponding FFR. Unliquidated obligations cannot be included in the amount considered for reallocation because funds need to be retained to cover payment upon receipt of those bills.

8.8.7 Personal Services + Personnel Benefits as a percentage of Total Outlays (PS+PB/Total)

JVSG funds are used to pay for grant-funded staff salaries and benefits, i.e. Personal Services (PS) or ‘*salaries for personnel*’ and Personnel Benefits (PB) or ‘*fringe benefits*’. VETS requires justification when the ratio forecast in the annual Budget Plan is less than 65%.

Once the Annual Budget Plan is approved, the PS + PB to Total ratio forecast will be compared to the actual ratio each subsequent FFY quarter to ensure expenditures are in line with the approved ratio. If the reported ratios deviate down from the approved ratio by 2% or more, the DVET will provide technical assistance. If the PS + PB ratio continues to be disproportionate with the approved plan, the DVET may place the state on a Corrective Action Plan.

Calculating Planned PS + PB to Total Ratio


Using VETS-401, JVSG Budget Information Summary, Section B, Columns (a) – (e)

(Line 1 (Personnel) + Line 2 (Fringe Benefits)) divided by Line 9 (Total Costs)

Example (DVOP Activities):

(\$331,985.96 + \$166,985.25) divided by \$760,000.00 = 65.65% PS+PB to total planned ratio

Description: The sum of Lines 1 (PS) and 2 (PB) divided by Line 9 (Unrounded Total) for each item in each Section B. VETS-401 column (Columns. a- e).

 JOBS FOR VETERANS STATE GRANTS BUDGET INFORMATION SUMMARY							
						OHP Control Number: 1233-0003 Expiration Date: 11/30/2012	
SECTION A – GRANTEE IDENTIFICATION INFORMATION							
State: AW		Grant Number: AW-DV-14587-10-55-5-16			Date Prepared: 7/28/2010		
SECTION B - BUDGET SUMMARY BY CATEGORY							
U.S. DEPARTMENT OF LABOR FUNDS							
Object Class Category	(a) DVOP Activities	(b) DVOP Special Initiatives	(c) LVER Activities	(d) LVER Special Initiatives	(e) TAP	(f) Incentives	(g) Total
1. Personnel	\$331,985.96	\$32,879.69	\$338,945.21		\$10,296.35		\$714,107.21
2. Fringe Benefits	\$166,985.25	\$11,147.85	\$195,639.85		\$5,564.83		\$379,337.78
3. Travel	\$2,450.00		\$3,500.00		\$500.00		\$6,450.00
4. Equipment							\$0.00
5. Supplier							\$0.00
6. Other	\$128,546.96	\$6,258.97	\$145,879.96		\$5,284.58		\$285,970.47
7. Total Direct Costs (Lines 1-6)	\$629,968.17	\$50,286.51	\$683,965.02	\$0.00	\$21,645.76		\$1,385,865.46
8. Indirect Costs	\$130,031.83	\$9,713.49	\$106,034.98		\$2,354.24		\$248,134.54
9. Total Costs (Lines 7+8)	\$760,000.00	\$60,000.00	\$790,000.00	\$0.00	\$24,000.00	\$0.00	\$1,634,000.00
10. Total Costs (Rounded)	\$760,000.00	\$60,000.00	\$790,000.00	\$0.00	\$24,000.00	\$0.00	\$1,634,000.00
11. Total Costs (By Program)	\$820,000.00		\$814,000.00				

Calculating Actual Year-to-Date PS+PB to Total Ratio

Using VETS-402 (A or B) JVSG Expenditure Detail Reports, Quarters 1- 4, Section C. Expenditure Information, Column C

(Lines 2, 6, 13, 17 and 22 (PS by Activity) + Line 3, 7, 14, 18 and 23 (PB by Activity)) divided by the respective Lines 4, 8, 15, 19 and 24 (Total Outlays by Activity)

Example (DVOP Activities):

(\$237,371.81 + \$117,888.10) divided by \$512,245.56 = 69.35%

Description: The sum of Personal Services (PS) and Personnel Benefits (PB) lines by activity (below) divided by Total Outlays for each Activity (DVOP, LVER, TAP) in Section B, VETS-402 A or B, Column (c) Reported Year-to-Date (YTD).

SECTION A - GENERAL INFORMATION			
1) State:	AW	2) Grant Number:	AW-DV-14587-10-55-5-16
3) Fiscal Year:	2010	4) Date Prepared:	7/19/2010
SECTION B - FUNDING INFORMATION			
CUMULATIVE FUNDS ALLOCATED THROUGH THE END OF THIS REPORTING PERIOD FOR:			
1) DVOP Total Fundr:	\$605,000.00	3) LVER Total Fundr:	\$610,000.00
Fundr:	\$40,000.00	4) LVER Special Initiative Fundr:	
		5) TAP Fundr:	\$18,000.00
SECTION C - EXPENDITURE INFORMATION			
	Previously Reported (a)	Reported this Quarter (b)	Reported YTD (c)
DVOP Expenditures			
1. Base Positions Paid for DVOP Activities:	9.66	9.71	9.68
2. Personal Services (PS) for DVOP Activities:	\$152,848.12	\$84,523.69	\$237,371.81
3. Personnel Benefits (PB) for DVOP Activities:	\$77,652.52	\$40,235.58	\$117,888.10
4. Total Outlays for DVOP Activities:	\$332,658.98	\$179,586.58	\$512,245.56
5. Base Positions Paid for DVOP Special Initiati	0.98	0.99	0.98
6. Personal Services (PS) for DVOP Special Initi	\$9,816.23	\$9,157.41	\$18,973.64
7. Personnel Benefits (PB) for DVOP Special Init	\$3,012.39	\$3,125.69	\$6,138.08
8. Total Outlays for DVOP Special Initiatives:	\$17,825.65	\$18,258.96	\$36,084.61
9. Total Outlays for DVOP:	\$350,484.63	\$197,845.54	\$548,330.17
10. Federal Share of DVOP Unliquidated Obligati		\$12,587.41	\$12,587.41
11. Total DVOP Fund Outlays and Obligations:	\$350,484.63	\$210,432.95	\$560,917.58
LVER Expenditures			
12. Base Positions Paid for LVER Activities:	9.74	9.85	9.78
13. Personal Services (PS) for LVER Activities:	\$148,975.23	\$85,239.23	\$234,214.46
14. Personnel Benefits (PB) for LVER Activities:	\$14,589.65	\$41,258.36	\$155,848.01
15. Total Outlays for LVER Activities:	\$385,655.17	\$192,548.74	\$578,203.31
16. Base Positions Paid for LVER Special Initiati			
17. Personal Services (PS) for LVER Special Initi			
18. Personnel Benefits (PB) for LVER Special Ini			
19. Total Outlays for LVER Special Initiatives:			
20. # TAP Workshops Facilitated by Grant Func	12	6	18
21. Base Positions Paid for TAP:	0.34	0.34	0.34

8.9 Evaluating and Improving Performance

Each quarter, the state is required to provide the DVET with copies of the ETA 9002 and VETS 200 reports which detail various aspects of activity and performance. While the reports indicate they are for a certain time period i.e. Quarter Ending..., they actually contain data for a “rolling four quarters.” Large variations in performance outcomes can occur between quarters due to seasonal employment variations, large numbers of demobilizing Reserve/Guard members, and other factors. The rolling four quarters approach to performance evaluation examines performance trends that reflect a four quarter average. Evaluating a year's worth of data each quarter removes cyclical quarter to quarter fluctuations to more clearly pinpoint overall performance trends which improve the accuracy of forecasts.

VETS negotiates performance measures on a PY basis. State Agencies in coordination with the DVET use [current guidance](#) to negotiate annual performance goals for their state. Since performance outcomes are reported each quarter, the DVET should begin to analyze performance the quarter immediately following negotiation. Analysis should focus on evaluating the accomplishments of the state workforce agency and grant-funded staff and the progress each has made toward reaching the negotiated goals.

While the quarterly outcomes are important and deserving of attention, each state agency is expected to meet its negotiated goals by the quarter ending June 30th. The DVET is not required to take formal action or institute a Corrective Action Plan for failing to meet goals in the preceding quarters, but a good analysis and early suggestions for correction may have a positive impact on future state agency accomplishments, to some degree.

Since entered employment and employment retention rates are based on wage records, there is significant lag time between the period in which a participant “exits” the program and when he or she is formally reported in the outcomes. The results of technical assistance provided by the DVET to improve performance outcomes will not be immediately evident, so it should be offered as soon as a problem, or once a negative trend, is identified.

Desk audits and on-site reviews of offices are an integral part of evaluating the state agency's performance. Guidance for DVETs in the performance of state workforce agency reviews can be found in the current [DM](#) and Technical Assistance Guide ([TAG](#)). The following sections provide more detailed information on the factors that may affect performance outcomes and suggestions on how to evaluate indicators of service.

8.9.1 External Factors

Some factors that may negatively impact performance outcomes are external to the state agency and are not directly controllable. The list of external factors is extensive; some examples are:

- Emergent economic conditions;

- Unemployment rates;
- Loss of major industries or downsizing;
- Decreased JVSG funding;
- State imposed mandates such as agency down-sizing, hiring freezes, and travel bans;
- High turnover rates for grant-funded staff;
- Funding cuts in other programs such Wagner-Peyser and WIA; or,
- Larger than anticipated numbers of demobilizing National Guard and Reserve members.

Even though the state cannot control these factors, they must develop strategies and take actions to react to them. A DVET that helps focus attention on one or more of the many internal factors (those that can be controlled) listed in the next section may assist the state agencies improve performance outcomes, even during economic downturns.

8.9.2 Internal Factors

There are factors over which the state agency can exert some control to improve performance outcomes, i.e. staff location, staff assignment and utilization, training, etc. VETS staff should provide technical assistance to grantees to examine those factors that can be controlled such as:

- Triaging Veterans in the service delivery points to ensure grant-funded staff help those most in need and that all staff adhere to providing priority of service to Veterans and other eligible persons;
- Targeting services to specific categories of Veterans to keep from spreading resources too thin;
- Assigning limited grant-funded staff to locations most in need;
- Converting grant-funded staff to full-time rather than half-time; or
- Changing the mix of grant-funded staff to serve those most in need (changing LVER staff to DVOP specialists and vice versa).
 - Making changes that allow DVOP specialists to focus on their primary core role which is to provide intensive services to targeted Veterans.
 - Make changes that allow LVER staff to focus on their primary role, which is employer outreach on behalf of Veterans.

8.9.3 Other Performance Indicators

The Common Measures described in [section 8.6.6](#) were developed as a means to evaluate programs with similar goals. OMB developed the uniform evaluation metrics for job training and employment programs in an effort to institute uniform definitions for performance. The common measures for job training and employment apply to 31 programs administered by six Federal Agencies.

Even though state agencies report and VETS evaluates the outcomes for these Common Measures, a look at other performance indicators can be very useful. Performance indicators should reflect the goals and strategies of an organization and should be quantifiable. For the JVSG, performance indicators should be evaluated to:

- Ensure grant-funded staff are serving only Veterans and other eligible persons when charging their time to the JVSG;
- Veterans and other eligible persons receive priority of service in all DOL funded programs; and
- Veterans and other eligible persons served by grant-funded staff need and receive more than the core services available to the general population served by Wagner-Peyser staff.

The ETA 9002A-D and VETS 200A-C reports, submitted by the states quarterly, allow the DVET/GOTR to assess grantee performance in meeting their negotiated performance goals. These reports can also be used to measure priority of service to Veterans seeking employment and employment assistance.

DVET/GOTRs can identify:

- The number of participants being served,
- Whether priority of service is observed,
- Who is providing services to Veterans and non-Veterans,
- Referral rates of Veterans compared to non-Veterans,
- Whether the DVOP and LVER are preserving their separate roles, and
- Outcome results (entered employment rates, employment retention rates, and average earnings/wage gains).

8.9.3.1 Service to Non-Veterans

DVOP specialists and LVER staff exclusively serve Veterans, TSMs, and other eligible persons (certain spouses) during the time they are paid by the JVSG. In accordance with the Special Grant Provisions, the following is the priority order of Veterans and eligible persons served by DVOP specialists and LVER staff:

- Service-connected Disabled Veterans;
- Veterans who served on active duty during a war or in a campaign or expedition for which a campaign badge or expeditionary medal has been authorized;
- Recently separated Veterans;
- Other eligible Veterans; then
- Eligible spouses (other eligible persons).

States may identify in their State Plan other populations of Veterans and eligible persons that will be targeted for outreach and intensive services.

States cannot use grant-funded staff to serve other customers under any circumstances. Grant-funded staff should not be assigned to work in common areas of the One-Stop or service delivery point such as referral desks or resource rooms where they may be required to provide services to non-Veterans. DVETs should closely monitor the number of non-Veterans served by grant-funded staff reported on the VETS 200 reports and require an explanation from the grantee when the numbers are not justified.

8.9.3.2 Veterans Served by Grant-Funded vs. Non-Grant Funded Staff

Even though grant-funded staff serve Veterans, TSMs, and other eligible persons exclusively, it is not VETS policy to require or recommend that every Veteran seeking employment services be seen by a DVOP specialist or LVER staff. The efforts of DVOP specialists and LVER staff should focus on those Veterans with barriers to employment, Disabled Veterans and others who need staff-assisted service or intervention to break into or reenter the civilian labor market. This is more clearly defined in [VPL 07-10](#), Refocused Roles and Responsibilities of Jobs for Veterans State Grant Funded Staff.

One means of determining the extent to which the state agency (or a particular One-Stop Center or employment office) is referring most or all Veterans to the DVOP specialist or LVER staff is by reviewing the ETA 9002B and the VETS 200A and/or VETS 200B and comparing the total number of Veterans and other eligible persons receiving staff assisted services by the entire staff vs. the grant-funded staff.

8.9.3.3 Rate of Referral

States sometimes compare the rate of referral to employment for Veterans to that of non-Veterans and, if the latter rate is lower, cite it as evidence of priority of service. While a higher rate of referral to employment for Veterans may be an indicator of priority of service, it is advisable to look beyond that statistic to determine how efficiently the state agency is exercising its responsibility. For example, comparing the entered employment rates for Veterans and non-Veterans could lend some perspective to the referral rates. If a state notes that its rate of referral to employment is X% higher for Veterans than non-Veterans, but the entered employment rates do not show a comparable margin in favor of Veterans, the DVET should examine why not. While there may be legitimate reasons for

a variance, the DVET may find that the state agency is simply referring Veterans to jobs for which they are not suitable or qualified, which is neither efficient nor advisable. Priority of service should be demonstrated by targeted referrals, job development, and results, not just by generating activity.

8.9.4 Technical Assistance to Improve Performance

State Agencies determine the number of half-time and full-time DVOP specialists and LVER staff appropriate to carry out services to Veterans, where grant-funded staff will be located, and what their specific job duties are. VETS has issued [policy guidance](#) on staff roles and responsibilities to help state agencies make effective and responsible staffing decisions:

- When the grant allocation allows assignment of at least one full-time equivalent (FTE) DVOP specialist position and/or LVER position to a particular location, each position will be assigned to one full-time staff member rather than to two halftime staff members. This restriction does not preclude the assignment of a halftime DVOP specialist and a half-time LVER staff member to the same location;
- No person will be employed as both a half-time DVOP specialist and a half-time LVER;
- When charging the JVSG, only duties consistent with the distinct roles and responsibilities for services to Veterans may be charged by DVOP specialists and LVER staff in accordance with [VPL 05-05](#) or the most current VPL on the subject of Direct and Indirect Charges;
- States must identify all staff that directly charge the grant for their time on all Staffing Directories (VETS 501) in accordance with instructions provided with the form and must ensure staff assignments are updated each quarter in accordance with [VPL 01-10](#) or the most current VPL on the subject of Recurring Reports;
- To the greatest extent possible, states should provide a separate desk code or logon identification to staff funded by the JVSG on a half-time basis to ensure only those services recorded as provided by DVOP specialist or LVER staff are reflected in performance reports;
- Timekeeping records must be maintained for each half-time DVOP specialist and/or LVER to ensure that at least 50 percent of their time is devoted to duties commensurate with and permissible under [VPL 07-10](#);
- Decisions to convert full-time grant funded positions to half-time should be made in consultation with the DVET to determine if a modification to the approved State Plan is needed.

8.9.4.1 Staff Location

Changes to the locations where grant-funded staff are assigned can, in many situations, improve performance. For example, if the LVER staff or DVOP specialists are assigned to offices where the population of Veterans seeking work is lower than other locations, VETS staff may recommend that they be reassigned they are located where they can have maximum exposure to Veterans seeking work, training, etc.

8.9.4.2 Diverse Roles and Responsibilities

DVOP specialists and LVER staff concentrate their efforts, according to their respective roles and responsibilities, on outreach and the provision and facilitation of direct client services to those who have been identified as most in need of intensive employment and training assistance. Through outreach with employers, LVER staff develop increased hiring opportunities within the local workforce by raising the awareness of employers of the availability and the benefits of hiring Veterans. VETS guidelines are in place to ensure that the two grant-funded positions maintain their separate roles and responsibilities. States use the VETS guidance to establish performance standards that are in line with regulations and grant provisions.

The roles and responsibilities provide the states with a framework that includes two key elements: 1) required core roles for DVOP and LVER staff, and 2) listings of examples of responsibilities that are appropriate for each of the required roles. States are required to maintain the core roles for each position but have the flexibility to add other appropriate responsibilities. This dual structure provides states with the opportunity to tailor DVOP specialist and LVER staff performance responsibilities to reflect the requirements of their unique service delivery environment while maintaining the differences between the two positions.

When evaluating performance outcomes, DVETS should evaluate how well defined roles and responsibilities for grant-funded staff align with the needs of the populations of Veterans being served.

8.9.4.3 Other Staffing Factors

For the purpose of the JVSG, part-time is defined as half-time. The Jobs for Veterans Act provided flexibility to states by allowing them to choose which SDPs are staffed with DVOP specialists and/or LVER staff. The Special Grant Provisions and subsequent guidance make clear that, to the greatest extent possible, full-time DVOP specialists and LVER staff should be assigned at every location with sufficient resources to support the assignment of full-time staff, rather than assigning two or more half-time staff. The main justification for using half-time DVOP specialists and/or LVER staff is to provide services in multiple or remote locations in states with limited funding and/or in SDPs without enough workload to justify a full-time position. In most cases, one or more full-time employees dedicated to serving only Veterans and other eligibles is more effective than multiple half-time employees dividing their time between different programs servicing diverse populations and customers. Exceptions to this policy must be justified by explaining how services to Veterans will be improved.

It is VETS policy that no one individual will be concurrently employed in both part-time DVOP and part-time LVER capacities. The intent of Congress is to have two separate programs that provide distinctly different services.

Every effort shall be taken by state agencies to hire qualified Veterans for both DVOP and LVER positions in the following order of priority: 1) Qualified service-connected Disabled Veterans; 2) Qualified eligible Veterans; 3) Qualified eligible persons, as defined in Title 38 U.S.C., Section 4101(5). Non-Veterans may be appointed to DVOP and/or LVER positions only after all means of recruiting qualified service-connected disabled and other Veterans have been exhausted.

Per Title 38 U.S.C. 4102A, (c), (B), the state must, "on an annual basis, notify the Secretary of and provide supporting rationale for, each non-Veteran who is employed as a Disabled Veterans' outreach program specialist and local Veterans' employment representative for a period in excess of six months". This notification is made to the appropriate DVET and may be made in the Technical Performance Narrative (TPN) with a quarterly report or under separate cover.

8.9.4.4 DVOP Specialists vs. LVER Staff

In order to best serve job-seeking Veterans effectively and efficiently, VETS, through the development of roles and responsibilities for each position, provides a framework that includes required core roles of a DVOP specialist and LVER staff, and examples of responsibilities appropriate for each of the core roles. This dual structure is intended to provide grantees with the ability to tailor DVOP specialist and LVER staff performance plans to reflect their unique service delivery structure and the particular situation in their state while maintaining the differences between the two programs.

DVOP specialists facilitate intensive services to Veterans with special employment and training needs. These are known as barriers to employment. Training courses are available on intensive services using the case management approach through NVTI. VETS definition of intensive services is consistent with WIA Section 134(d)(3)(C). The intensive services category includes:

- Comprehensive assessment of education, skills, and abilities;
- In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
- Group and individual career coaching;
- Short-term pre-vocational services that may include development of learning and communication skills, interviewing skills, personal maintenance skills, and professional conduct to prepare individuals for career goals; and

- Development of an individual employment plan that identifies employment goals, interim objectives, and appropriate services that will enable the Veteran to meet his or her employment goals.

DVOP specialists should target services to Special Disabled Veterans, Disabled Veterans, economically or educationally disadvantaged Veterans, and Veterans with other barriers to employment, especially homeless Veterans. In order to maximize services to those Veterans, DVOP specialists conduct outreach activities at a variety of sites including, but not limited to:

- Vocational Rehabilitation and Employment programs
- Homeless Veterans' Reintegration Project grantees
- Department of Veterans Affairs medical centers and Vet Centers
- Homeless shelters
- Civic and service organizations
- Community Stand Downs
- Military installations
- WIA partners
- State vocational rehabilitation agencies

LVER staff work with other service providers to promote Veterans, as job seekers who have highly marketable skills and experience, to employers. They advocate for Veterans for employment and training opportunities with business, industry and community-based organizations. To accomplish this, LVER staff must participate in a variety of outreach activities including, but not limited to:

- Planning and participation in job fairs
- Coordinating with unions, apprenticeship programs, and business organizations to promote employment and training opportunities for Veterans
- Informing Federal Contractors of their responsibility to recruit and retrain qualified Veterans
- Promoting credentialing and training opportunities for Veterans with training providers and licensing agencies

LVER staff provide and facilitate a full range of employment, training and placement services to meet the needs of Veterans with priority given to targeted categories identified

and approved in the State Plan. These services may include, but are not limited to the provision of:

- Job search assistance workshops
- Job development and referrals
- Vocational guidance
- Labor market information
- Referrals to training and supportive services

The needs of Veterans being served by a local office or in a geographic area and the local labor market should be considered when deciding whether grant-funded-staff are assigned as DVOP specialists or LVER staff. State agencies should periodically review the role assignments to ensure that DVOP and LVER staff continue to be appropriately utilized to maximize opportunities for the Veterans seeking employment or training-related assistance.

8.9.4.5 Staff Training

[P.L. 111-275](#) stipulates that all DVOP specialists and LVER staff appointed to their position after January 1, 2006 receive specialized training from NVTI or current contractor. Affected DVOP specialists and LVER staff have 18 months to complete the designated specialized training:

- Labor and Employment Specialist and Promoting Partnerships for Employment for LVER staff;
- Labor and Employment Specialist and Case Management for DVOP specialists.

These core training classes provide the foundation needed by grant-funded staff, but other training may be needed to improve performance outcomes for Veterans. The DVET should provide technical assistance to the grantee to identify problem areas that may be improved or corrected with additional training as well as the resources for the training.

8.10 Priority of Service

38 U.S.C. 4215 makes priority of service for Veterans (or other covered persons) mandatory in all workforce and job training programs funded in whole or part by the U.S. Department of Labor. VETS issued regulations established parameters for Veteran priority of service. For all covered programs, Veterans must meet the basic eligibility requirements in order to obtain priority of service. When a Veteran meets the basic eligibility requirements for a particular program, he or she is deemed “qualified” for participation in that program. Priority of service requires that a “qualified” Veteran or other covered person be given priority over a “qualified” non-Veteran for the receipt of employment, training and placement services provided under that program, notwithstanding any other provision of the law.

The Department’s strategic vision for priority of service to covered persons honors Veterans and certain spouses of Veterans as our “heroes at home.” It envisions DOL-funded employment and training programs that provide outreach and comprehensive service delivery to covered persons as part of strategic workforce development activities across the country. Priority of service for Veterans is an important acknowledgment of the sacrifices of the men and women who have served in the U.S. armed forces.

Priority of Service will be monitored by both VETS and the applicable Grantor Agency in accordance with the departmental regulations ([20 CFR, Part 1010.240](#)).

8.10.1 Covered Programs

The [ETA guidance](#) on Veterans’ Priority of Service lists 20 DOL programs subject to the requirement. In the list below, an asterisk (*) after a program name indicates that Veterans must first be eligible in accordance with existing statutory priorities. A pound (#) sign after a program indicates that the program serves a specific target population. Veterans within that population will receive priority before non-veterans within that population. Prior to program participation, an individual Veteran’s status will be assessed at the same time as eligibility with the program’s distinct provisions.

- WIA Adult program*
- WIA Dislocated Worker program*
- Wagner-Peyser Employment Services
- Community-Based Job Funding Grants
- Trade Adjustment Assistance Programs
- National Emergency Grants
- Senior Community Service Employment Program*

- Migrant and Seasonal Farm Worker Program #
- Indian and Native American Program #
- H-1B Technical Skills Training Grants
- Job Corps *
- Office of Disability Employment Programs #
- Welfare to Work Program*
- Veterans Workforce Investment Program *
- WIA Youth Program*
- Labor Market Information Formula Grants
- Pilots and Demonstration Grants
- Research and Development
- Career One-Stop Electronic Tools
- Other Internet based tools operated by US DOL grantees

Priority of service ensures that covered persons receive priority employment and job training services that will effectively integrate them into the economy. The priority of service regulatory provisions are implemented to help ease the transition of Service Members to civilian careers and to honor their service and sacrifice. It does not change a program's intended functions; covered persons still need to meet all eligibility and program requirements for participation. In any decision on how to allocate funds and approve training slots, qualified Veterans have priority over qualified non-Veterans.

At the local level, priority of service is also a 'mindset' within the One Stop Career Centers that stresses partnership and collaboration among all One Stop partners and program providers in order to integrate Veterans and TSMs into the civilian workforce as smoothly and seamlessly as possible. Functional alignment within the One-Stop system supports this priority of service by ensuring that Veterans and other eligible persons have access to a full range of employment and training services, not limited to the labor exchange services provided by either Wagner-Peyser funded staff, DVOP specialists or LVER staff.

8.10.2 Measures of Priority of Service

NOTE: (Current guidance can be found in [TEGL 10-09](#) and [VPL 07-09](#)):

Veterans exercising their right to priority of service should expect assistance that goes far beyond the mention of or referral to a DVOP specialist or LVER staff. When evaluating the extent Veterans receive priority of service VETS staff should:

- Determine and verify how each state agency, One-Stop Career Center, and other SDPs provide and locally monitor priority of service;
- Determine and verify how Veterans are made aware of their entitlement;
- Determine and verify how other program provider staff are made aware of their responsibilities to provide priority of service;
- Determine how Veterans are made aware of the special assistance available from DVOP specialists and LVER staff; and
- Determine how the grantee addresses prioritization of special populations of Veterans identified in the State Plan.

8.10.2.1 Integration in the One-Stop Career Center

With the implementation of the [Workforce Investment Act \(WIA\) of 1998](#), DVOP specialists, LVER staff, Wagner-Peyser funded staff, and staff funded other employment-related programs were integrated into a nationwide network of One-Stop Career Centers. These centers deliver a significant percentage of all qualified job training services and are required to implement priority of service. All One-Stop Career Centers should have clear strategies for providing Veterans and certain spouses of Veterans with the highest quality of service at every phase of services offered. Veterans who seek One-Stop Career Center services must be:

- Provided the full array of services (universality) available to eligible Veterans within the system;
- Empowered with customer choice (choice) and given customized access to those services which satisfy their individual needs for career development;
- Provided information on and priority of service in all covered programs; and
- Provided access to a universal career center system at all virtual and affiliated physical One-Stop system locations ('no wrong door').

8.10.2.2 Indicators of Integration

States are required to submit a plan of service for Veterans and detail among other things, how DVOP specialists and LVER staff are integrated into the One-Stop Career Centers. This integration can range from basic functions of the One Stop System, such as assistance with job search and the need for skills training, to more customized initiatives such as creating pathways into high growth sectors of the economy. The One-Stop

system will draw on all available resources to support the needs of covered Veterans and their spouses to meet their specific needs and concerns.

Some examples of integration are:

- Communication between DVOP and LVER staff with other staff in the One-Stop Center;
- Direct provision by One-Stop Center staff of information to Veterans concerning all of the resources available to them; and, then helping them to access and use that information;
- Inter-office coordination and communication on how to best meet the unique needs of Veterans seeking employment or training-related services through interactive cooperation; and
- Ensuring at all levels, staff awareness and understanding of the state's strategy to integrate DVOP and LVER staff into the One-Stop Centers.

8.10.2.3 Technical Assistance

DVET technical assistance should be aimed at assisting the state agency to identify problem areas and find solutions to meet established performance goals and prevent deficient performance. DVETs should anticipate problems and issues and provide guidance to help state agency staff comply with priority of service requirements. When performing an on-site visit, the DVET should be able to discuss the applicable sections of legislation, regulations and policies to reinforce or emphasize requirements; provide useful suggestions for improvement and identify recommendations for corrective actions which are compliant with legislative intent/statutory provisions.

8.10.2.4 Best Practices

DVETs are encouraged to discuss review findings with other VETS staff to learn from each other's experiences and identify practices and strategies that might benefit Veterans in their state. While not an all-inclusive list, some examples of best practices are:

- Conducting periodic, recurring internal training with all One-Stop staff that facilitates idea sharing, identifies common barriers encountered, and brainstorms strategies to overcome them;
- Providing job ready Veterans with access to personal computers and all electronic placement services and programs within the One-Stop Center, rather than simply referring them to a DVOP specialist or LVER;
- Mapping out customer flow and developing necessary procedural linkages between service modalities to ensure all appropriate services are easily accessible to Veterans.

- Restricting DVOP client services for those who have barriers to employment and need intensive services beyond the core level; and ensuring that Wagner-Peyser and other partner staff provide core services for those Veterans who are job ready;
- Marketing job seeking Veterans to the business community by all One-Stop Center staff;
- Ensuring LVER direct access to the One-Stop Career Center Manager to make recommendations to improve services to Veterans;
- Ensuring understanding by all partner staff of programs and services for Veterans and ensuring DVOP specialists and LVER staff fully understand all of the partner services, so that mutual awareness of supportive services and employment opportunities maximize job or training prospects for Veterans; and,
- Services to Veterans are considered an all-staff responsibility and all staff are trained to correctly identify eligible Veterans and other eligible persons.

8.11 Assessment of Service Delivery Points and Validation Visits (reserved)

**8.12 Annual Assessment of the State Workforce Agency
(reserved)**

8.13 Stakeholder Outreach and Coordination

8.13.1 Coordination between VETS and the VA for Vocational Rehabilitation and Employment (VR&E)

A Memorandum of Understanding (MOU) signed October 3, 2005 between VETS and the VA provided for the establishment of a Joint Work Group (JWG) whose goal would be to improve the quality of employment services and outcomes for veterans with disabilities. The VA and VETS agreed that the JWG was the appropriate mechanism to establish and standardize processes that would ensure disabled veterans participating in the Chapter 31 program achieve the ultimate goal of successful career transition and suitable long-term employment. A new [TAG](#), provided as Attachment 3 to [VPL 01-09](#), dated December 11, 2008, outlines the roles and responsibilities of each player on the “team” and the processes that should be followed to ensure veterans that apply for and receive Chapter 31 benefits receive the very best service possible and achieve successful employment outcomes. The TAG was field tested in eight states and the results provided the basis for a new reporting process, through submission of a new data collection instrument which states will be required to submit on a quarterly basis. The Vocational Rehabilitation & Employment (Chapter 31) Tracking Report ([VETS-201](#)) and its [instructions](#) have been approved by OMB and are available through a link on the VETS Home Page.

8.13.2 Recovery and Employment Assistance Lifelines Program (REALifelines)

REALifelines provides information and assistance for the economic recovery and employment or reemployment of Service Members who were seriously wounded or injured in Operation Iraqi Freedom (OIF) [OIF was renamed “Operation New Dawn” on 09/01/2010] or Operation Enduring Freedom (OEF) and are transitioning to civilian life. The program addresses the employment needs of participants, identifies any barriers to employment they might have, and helps them overcome these barriers. REALifelines, which is administered by VETS, is a collaborative partnership among the DOL, the DoD, the VA, the state agency, and private and public employers.

In accordance with the [REALifelines TAG](#), the DVET (or designee) will serve as the primary liaison between the VETS Region, the REALifelines participant, the state agency, and other local partners. The DVET will function as the REALifelines lead for his/her assigned state, coordinating the cooperative structure and processes for REALifelines activities among all partners. The nationwide network of Career One- Stop Centers is integral to the success of REALifelines. One Stop staff, particularly DVOP specialists, are uniquely trained and ideally located to provide specialized and intensive services at the local level. Various resources provided by supportive service organizations are available at the national and state level.

8.14 VOPAR

VOPAR is a data entry system that was designed to receive and compile data and provide reports on the several VETS programs, including the JVSG. The [VOPAR JVSG User Guide](#) provides information on JVSG screens and is designed to walk an individual through the process of logging on, entering data, and reviewing reports. Each section of the User Guide includes screen shots with instructions for completing the following actions:

- Logging on and using the role-based system;
- Creating and revising the State Profile and Annual Plan;
- Creating and editing Notices of Obligation Authority (NOAs);
- Entering, editing and approving quarterly Expenditure data;
- Entering the annual Incentive Award Summary; and
- Viewing reports.

The VOPAR User Guide can be reached by this hyperlink: [\[VOPAR User Guide\]](#). You must be connected to the VPN for the link to work. You may also reach the VOPAR User Guide manually by going to the National Office drive (O: drive if you are in the field, or V: from a Regional Office) and browsing to Jobs for Veterans State Grants\VOPAR User Guide (JVSG).doc.

The VOPAR reporting system can be found at: <https://vopar.doleta.gov>. A user name and password is required to enter the system. New users can request access to VOPAR by completing a [VETS User Account Form](#) and signing the [Rules of Behavior](#) (ROBs).

The VETS employee requesting access to VOPAR must sign the ROBs. His or her supervisor must sign the account form authorizing the appropriate access level in VOPAR. Both forms should then be scanned to one PDF file and saved with the file name that reflects the new user's name in the format: Last name, First name.pdf. The file should then be sent to: vopar-help@dol.gov.

Upon approval, the requestor will be assigned a user name and password that allows access to the system based on the individual's "role", i.e. State User, DVET/GOTR, Regional Office User, or System Administrator. The following "roles" and associated access have been established for JVSG data in VOPAR:

- State User (for his/her state only):
 - Can view all screens
 - Can input or update information
- DVET / GOTR (for his/her state only):

- Can input and update the “State Profile and Annual Plan;” can view only the most current profile
- Can input and update quarterly “Expenditure” data
- Can view all Notices of Obligation Authority (NOAs)
- Can input and update annual Incentive Award data if applicable
- Can view and print reports
- Regional Office Users – (for all states within his/her region)
 - Will enter NOAs
 - Will review Expenditure data and approve or return to DVET for correction as applicable
 - Can view reports
- National Office/Administrator
 - Will issue access to VOPAR
 - Will open and reopen quarters for data input and updates as needed and requested
 - Can view all profile, NOA, Expenditure data and reports for all states

The DVET is responsible for ensuring the State Profile is entered before October 1st of each fiscal year. Those DVETs who have not done so will receive an automated E-mail message reminder on October 7th. The RAVET will be copied on the message along with National Office DVOP/LVER Program Lead and Jobs for Veterans Lead Center.

The Profile/Plan should be updated throughout the year any time there is a change to the information it contains. Reasons to update this screen include, but are not limited to:

- Changes to the name or address of the State Workforce Agency (SWA);
- Change to the name or title of the SWA Administrator;
- Change of Regional Administrator for Veterans’ Employment and Training;
- Changes to the fiscal spending forecast as a result of an approved modification or reallocation; or
- Changes to staffing levels resulting from approved modifications, cost increases, etc.

NOAs must be entered by a Regional Office user. An NOA cannot be created until the Profile for the state has been entered.

The DVET or other state user enters quarterly expenditure data each FFY quarter. The VOPAR system allows data entry for up to six quarters for each fiscal year – the four FFY quarters, a 5th quarter, and if needed, a closeout quarter that ends on March 31st of the following fiscal year.

The DVET is expected to have entered quarterly expenditure data before the 20th day of the second month following the end of the quarter (i.e., February 20th, May 20th, August 20th and November 20th). Those DVETs who have not done so will receive an E-mail reminder on the 22nd day of the months listed. The RAVET will be copied on the message along with selected Veterans' Lead Center and National Office staff.

8.15 JVSG Recurring Event Calendar

This volume of the VETS Manual Series covers numerous recurring JVSG related actions, due dates, and submission requirements. The JVSG Recurring Event Calendar summarizes that information for actions like issuance of NOAs, Quarterly Fiscal, Performance and narrative reports, the Annual Incentive Award Report, 5th Quarter Spending Plans, Annual Funding and Interim Modifications, etc. The JVSG Recurring Event Calendar can be reached by this hyperlink: [Recurring Event Calendar](#) . You must be connected to the VPN for the link to work.

You may also reach the Recurring Event Calendar manually by going to the National Office drive (O: drive if you are in the field, or V: from a Regional Office) and browsing to Jobs for Veterans State Grants\JVSG Recurring Event Calendar.xls.