ATTACHMENT I

TECHNICAL PROPOSAL INSTRUCTIONS

This Attachment contains detailed instructions for the completion of a project narrative. PLEASE READ EACH SECTION OF THE NARRATIVE INSTRUCTIONS CAREFULLY. NO GRANT WILL BE RECOMMENDED FOR FUNDING THAT FAILS TO PROVIDE THE INFORMATION REQUIRED BY THIS GUIDANCE.

FORMAT

Although the Department encourages applicants to submit applications online, applicants may also elect to submit applications via disks or CDs, or in hard copy. If an application is submitted in hard copy, the text of the project narrative must be double-spaced with one-inch margins at the top, bottom, right and left sides. <u>Pages must be numbered</u>. The Department permits the use of graphs, maps, and tables, but these must be properly labeled. In addition to using the required section headings, the Department encourages applicants to use brief topic headings for paragraphs in the text.

To facilitate review of hard copy applications, the title, "PART I – PROJECT NARRATIVE" should be centered, the section headings and subheadings should be entered at the left-hand margin.

CONTENT

Content guidelines for the project narrative are discussed in the following five sections. The content must be concise and relevant. <u>Avoid direct reiteration of statutory or regulatory requirements</u>. The grant application must provide an explanation of the proposed project.

SECTION 1 – TECHNICAL APPROACH

This section requires information from the applicant about the operations of the proposed project and the methods and procedures that the applicant will use to implement project operations. You must provide a narrative that fulfills the requirements of the following two subsections.

A. **Plan of Action.** Provide a description of each project function or activity. You must provide adequate descriptions for the reviewer to ascertain how the applicant will implement the project. The following activities must be discussed separately:

(1) **Regional Economic Overview.** Provide an overview of the labor market and economic landscape of the regions in which you plan to implement your SCSEP projects. Your overview should identify industries that are growing in these regions, have high levels of total employment, or are otherwise critical to the success of the economies of these regions, and labor market information for specific occupations in those industries that offer career opportunities for SCSEP participants. If you are a national grantee and serve states or multi-state areas with more than three regions or if you are a state grantee serving multiple regions, you only need to provide this information for a sample of the regions in your service area.

(2) **Recruitment and Selection of Participants.** Outline a comprehensive plan for recruiting program participants. This plan should include specific recruiting activities that you will use, including the role of partners that will be involved in these efforts, and milestones, resources, and timelines. This plan should include a description of the role that One-Stop Career Centers will play in recruiting activities. The revised income definitions and income inclusions and exclusions for determining SCSEP eligibility, as described in TEGL 12-06, must be used to determine and document participant eligibility. Indicate how eligibility will be determined and documented. TEGL 12-06 may be accessed on www.doleta.gov/seniors under "Technical Assistance." Identify new strategies to recruit applicants who can meet the income eligibility guidelines, especially those who must have priority for service.

Priority is to be afforded to individuals who are 65 years of age and older or:

(a) Have a disability;

(b) Have limited English proficiency or low literacy skills;

(c) Reside in a rural area;

(d) Are veterans or spouses of veterans as defined in 20 CFR 641.520(a)(2);

(e) Have low employment prospects;

(f) Have failed to find employment after utilizing services provided through the One-Stop Delivery System; or

(g) Are homeless or are at risk for homelessness.   See OAA sec. 518(b)(1)-(2)

In addition, applicants must be mindful of the requirements of OAA sec. 515 regarding documentation of efforts to serve minority individuals under the program. Please refer to section (A)(25) of these instructions for planning requirements related to this provision.

(3) **20 CFR 641.505, Continued Eligibility for Enrollment in the SCSEP.** You are required to recertify the income of each participant at least once every 12 months. Indicate the schedule for certifying participants and the actions you plan to take to deal with those found to be ineligible, including notification of their right to appeal the finding. Indicate where eligibility records will be maintained. TEGL 12-06 does not permit self-attestation of income eligibility.

(4) **20 CFR 641.565(b)(ii)(A) and (B), Physical Examinations.** Describe the process for offering physicals to participants as a fringe benefit as required under current regulations. Also describe the process for maintaining documentation of those participants who elect to take physicals and those who waive them.

(5) **20 CFR 641.535(a)(1), Orientation.** Describe participant and host agency orientation procedures. The description should include mention of participant and agency responsibilities, permissible political activities, grievance procedures, etc.

(6) **20 CFR 641.535(a)(2), Assessment.** Describe procedures for assessing the job aptitudes, readiness, and preferences of participants, their barriers to employment, as well as their potential for transition into unsubsidized employment. Training and supportive service needs of participants must also be addressed as part of this assessment. You must conduct assessments no fewer than two times during a twelve-month period.

(7) **20 CFR 641.535(a)(3), Individual Employment Plan (IEP).** Describe how you will use the assessment to develop a participant's IEP, how often the IEP will be updated, and how the participant will participate in this joint effort at least as often as the assessment.

(8) **20 CFR 641.535(a)(4), Assignment to Community Service Employment Activities In Host Agencies.** Describe how participants will be assigned to community service employment activities and receive training. Include such factors as:

  (a) Types of community service employment activities that you will emphasize in assigning participants, and how they were chosen;

  (b) Methods you will use to match participants with community service employment assignments;

(c) Extent to which you will place participants in community service employment assignments involving the administration of the project itself and how you will ensure that all participants in a project are treated equally;

(d) Types of host agencies you will use and the procedures and criteria you will utilize in selecting the community service employment assignments;

(e) Process for ensuring that community service employment activities offered in communities provide training that prepares participants for unsubsidized employment;

(f) Process for ensuring that community service activities support the regional economy by helping prepare participants for employment opportunities that are prevalent in key industries in the regional economy or are otherwise critical to the success of the regional economy;

(g) Average number of hours per week for participants in community service employment assignments, including an explanation of circumstances if you anticipate that this may be adjusted during the course of the grant year to accommodate over-enrollment;

(h) Average hourly wage paid to participants during community service employment assignments, reflecting the higher of the local, State or Federal minimum wage as required at 641.565(a), and the average hourly wage paid to participants assigned to project administration;

(i) Time limits, if any, on the amount of time participants may spend at a particular host agency;

(j) Procedures for ensuring that participants are given adequate supervision during their community service employment assignment by host agency staff; and

(k) Procedures for ensuring that participants work in safe and healthy conditions.

(9) **OAA sec. 502(c)(6)(A)(i), Participant Benefits.** The 2006 Amendments change the prior policies that applied to participant fringe benefits. The use of grant funds for benefits is now limited to those that are required by State or Federal law (such as workers' compensation or unemployment insurance), the costs of physical examinations, compensation for scheduled work hours during which an applicant's or sub-recipient's business is closed for a Federal holiday, and necessary paid or unpaid sick leave that is not part of an accumulated sick leave program. At this time, the Department has not determined if the statute requires that grantees must provide necessary sick leave and Federal holiday pay to participants, and leaves it to the discretion of the grantees to develop reasonable

documented policy on this matter. Grant funds may not be used to pay the cost of pension benefits, annual leave, accumulated sick leave or bonuses. With the exception of physical examinations for participants, which is addressed in section A(4) above, you must describe benefits you will provide to participants, consistent with these new statutory parameters.

(10) **Other Training.** Describe the training that you will provide to participants in addition to training provided as part of a community service employment assignment, including, but not limited to, training provided through the One-Stop Delivery System. Identify the types of training provided (including occupation-specific training); the credential(s) that training leads to, including industry-recognized credentials, where appropriate; organizations that will provide training; how no-cost or low cost training is being leveraged through partnerships; and how training is linked to IEPs and the needs of the community, and will help prepare participants for unsubsidized employment, including employment opportunities that are prevalent in key industries in the regional economy or are otherwise critical to the success of the regional economy. Such training includes lectures, seminars, classroom instruction, individual instruction, online instruction, private sector on-the-job experiences, work experience or other arrangements. See Older Worker Bulletin 04-04.

In particular, applicants should describe plans to arrange to provide computer training for participants who require such instruction to prepare for meaningful community service employment assignments and unsubsidized employment, and should specify in the budget submissions that grant funds have been set aside for this purpose. If you have determined that your participants will not require computer training, you must provide documentation to support this decision.

(11) **OAA sec 502(c)(6)(C), Additional Funds for Programmatic Activity Costs**
The 2006 Amendments permit an exception to the 75% minimum level of expenditures on participant wages and fringe benefits that allows grantees to request to use not less than 65% of program funds for wages, benefits, and other costs, so that up to an additional 10% of funds is available for training and supportive services. Applicants that wish to request this authority must provide:

(a) A description of the additional training and supportive services;

(b) An explanation of how such activities will improve the effectiveness of the project and the employment outcomes for individuals served;

(c) A sequence and timeline for these activities; and

(d) If applicable, an explanation concerning whether any displacement of eligible individuals or elimination of positions for such individuals will occur, information on the number of such individuals to be displaced and

of such positions to be eliminated.

Applicants that requested this authority with their conditional applications should include a copy of this request with their complete application. If item (d) above applies, an additional explanation should be provided.

(12) **20 CFR 641.545, Supportive Services.** Describe the supportive services that you will offer to help participants obtain and retain an unsubsidized job. Identify the source(s) of these services.

(13) **20 CFR 641.550, Placement into Unsubsidized Employment.** Describe the steps that you will take to move or place participants into unsubsidized employment. Describe strategies for: identifying current employment opportunities and projected employment opportunities in regions, including employment opportunities in industries and occupations that are critical to the success of the regional economy; developing and maintaining partnerships with employers; efforts to identify employment opportunities with established career ladders; specific placement strategies, including strategies for placing individuals in industries and occupations that are critical to the success of the regional economy; strategies for placing participants in opportunities with established career ladders; and retention strategies once participants enter the workforce. Include the cooperative measures that you will take with the Workforce Investment Act and One-Stop delivery system in support of this effort, and who will be responsible for this implementation.

(14) **OAA sec. 502(b)(1)(C), Average Participation.** The 2006 Amendments require that grantees must meet an average participation cap for eligible individuals (in the aggregate) of 27 months starting on July 1, 2007, subject to extension for extenuating circumstances. Describe the procedures you will implement to meet this new requirement.

(15) **OAA sec. 518(a)(3)(B)(i), Maximum Duration of Program Participation.** The 2006 Amendments mandate new requirements relating to the maximum time period a participant may spend in the program. Describe how you will institute procedures to ensure that, starting on July 1, 2007, eligible individuals may not participate in the program in excess of a maximum duration of 48 months in the aggregate (whether or not consecutive), except in certain instances when an exception is granted by the Department. Describe how you will institute procedures to transition participants to unsubsidized employment or other assistance before the maximum duration time period has expired.

(16) **20 CFR 641.580, Terminations.** Describe participant termination policies for:

(a) provision of false information;

(b) income ineligibility determined at recertification;

(c) incorrect initial eligibility determination;

(d) cause; and

(e) failure to comply with the terms of the IEP.

(17) **20 CFR 641.910, Applicant, Employee and Participant Complaint Resolution.** Describe the system of due process for cases in which an adverse action is contemplated against a participant, an employee of the grantee or sub-recipient, or in cases in which an applicant for enrollment wishes to dispute an unfavorable determination of eligibility. Attach an example of the written explanation of the due process system that is given to each participant.

(18) **Over-Enrollment.** Describe how participant over-enrollment would be handled to minimize the impact on participants. Describe how you will notify participants in advance of any duration limits that are imposed, and how you will document acknowledgement of such limits. Describe how you will work with other grantees to balance Equitable Distribution requirements with over-enrollment to achieve equitable distribution.

(19) **OAA sec. 502(b)(1)(G), Maintenance of Effort.** Describe steps that you will take to ensure compliance with the maintenance of effort requirements, which have been slightly modified from the current regulations as a result of the enactment of the 2006 Amendments:

Each project funded under title V:

(a) Must not reduce the number of employment opportunities or vacancies that would otherwise be available to individuals not participating in the program;

(b) Must not displace currently employed workers (including partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits);

(c) Must not impair existing contracts or result in the substitution of Federal funds for other funds in connection with work that would otherwise be performed; and

(d) Must not assign or continue to assign any eligible individual to perform the same work or substantially the same work as that performed by any other individual who is on layoff.

(20) **Procedures for Payroll and Payment of Workers' Compensation Costs.** Describe how payroll and workers' compensation premiums are paid for

participants. Include in this description an estimate of how much is paid in a grant year for workers' compensation premiums and separately for workers' compensation claims. GRANTEES MAY NOT DELEGATE THESE PROCEDURES TO HOST AGENCIES.

(21) **Collaboration.** Describe how you will collaborate with other entities serving the same area to maximize opportunities for SCSEP participants to obtain intensive and training services, and to move into unsubsidized employment:

  (a) Coordination with the public workforce system. Describe collaboration with workforce investment boards, One-Stop Career Centers, and other WIA partners, such as: stationing SCSEP staff at One-Stop Career Centers; co-enrolling SCSEP participants at One-Stop Career Centers; utilizing intensive and/or training services available through WIA; and partnering with One-Stop Career Center staff on employer engagement strategies;

  (b) Collaboration with other key organizations in the community. Describe other organizations in the community with which the SCSEP program will collaborate, including vocational rehabilitation providers, basic education and literacy providers, and education and training providers such as community colleges; and

  (c) Establishment of Memoranda of Understanding (MOUs). Describe how MOUs will be established in areas where they do not exist, and the timeline for having agreements with all areas.

(22) **Non-Federal Share (Required Match).** Outline your strategy for providing the non-federal share of your project (i.e. the required match). This includes the specific cash and/or in-kind contributions that will be provided to satisfy this requirement. As provided at sec. 502(c)(1), in general, the Department may pay a Federal share not to exceed 90 percent of the cost of any project for which a grant is made unless a project is an emergency or disaster project, or a project in an economically depressed area, as determined by the Department in consultation with the Departments of Commerce and Health and Human Services.

(23) **Leveraged Resources**. Describe any strategy you may have for leveraging other resources, in addition to the non-federal share (i.e. the required match), from other key partners in your region(s) (including organizations in both the public and private sector) to support your SCSEP program. Organizations providing leveraged resources could include state and local government agencies, foundations, employers, community-based organizations, and other entities. Leveraged resources include the following:

  (a) Cash and/or in-kind contributions that could qualify as non-federal share (i.e. the required match), but are not included on the SF-424 and 424A as part of the formal non-federal share (i.e. the required match);

(b) Resources provided through involvement with other federal programs, such as Vocational Rehabilitation , Adult Education and adult services funded through the Workforce Investment Act;

(c) Cash and/or in-kind contributions that are allowable costs under OMB cost provisions, but are restricted and unallowable costs for the SCSEP program.

(24) **20 CFR 641.500(b), Cross-Border Agreements.** State applicants may enter into agreements to permit cross-border enrollment of eligible participants. Such agreements must cover both State and national grantee slots and must be submitted as an attachment to this section for approval by the Department.

(25) **OAA sec. 515, Service to Minorities.** The 2006 Amendments require that the Secretary prepare an annual report on the levels of participation and performance outcomes of minority individuals served by SCSEP. Accordingly, describe your plans to serve minority individuals in your service areas.

B. **Data Collection and Reporting.** In this section, describe how you will ensure complete, accurate, and timely data collection and reporting by all sub-recipients. Specifically, you   must indicate:

(1) How you will use SCSEP grant money or matching funds to obtain any needed hardware or Internet connectivity;

(2) How and where data entry will be accomplished if sub-recipients lack the capacity to perform data entry;

(3) How you will ensure that those capturing and recoding data are familiar with the latest instructions for data collection, including Department guidances, such as Older Worker Bulletins, TEGLs, the Data Collection Handbook, and Internet postings;

(4) How you will ensure that data are submitted timely for the QPR and final QPR;

(5) That sub-recipients will be legally obligated to enter all required data relating to all participants served during the period covered by its sub-grants;

(6) That sub-recipients will be legally obligated to turn over complete data files in the specified electronic format, as well as hard copy case files, to the grantee at the time that the sub-recipient ceases to administer the SCSEP;

(7) That any new sub-recipients will be legally obligated to enter complete data related to any participants whom they acquire upon becoming sub-recipients; and

(8) For non-Web DCS users, how you will ensure that data are uploaded to SPARQ in accordance with Department timelines and guidance.

C. **Equitable Distribution.** Describe any current slot imbalances and the steps you are proposing to correct such inequities in conjunction with other selected SCSEP applicants. Applicants must ensure that this information is consistent with the ED report.

SECTION 2 – GEOGRAPHIC AREAS TO BE SERVED

List the cities and counties where you will conduct the project and its subprojects. Include the number of SCSEP authorized positions that you will establish in each jurisdiction. For those applicants with a project located in a city but also serving surrounding counties (or other jurisdictions), the authorized positions for the surrounding counties/jurisdictions must be listed as well. Please indicate where the Department has changed authorized positions from the prior year. Also include a list of how many slots are filled and the number that are vacant. The Department suggests using a chart format, although you may elect to provide a narrative or other format.

SECTION 3 – PROGRAM ADMINISTRATION

A. **Organizational Structure, Staff and Systems.** Describe the organizational structure of the project, including a brief explanation of the mission and function of each unit connected with the project. Identify the key staff involved in the project, including their primary responsibilities. Outline the primary systems that you will use to support the project, including both MIS systems to track and collect participant data and financial management systems.

B. **20 CFR 641.861, Sub-recipient Management.** Sub-recipients are the legal entities to which a sub-award of financial assistance, which may include a subcontract, is made by the grantee (or by a sub-recipient), and that is accountable to the grantee for the use of funds provided. For purposes of the SCSEP, "sub-recipient" is defined at 29 CFR 95.2(kk).

Address key aspects of the management of SCSEP sub-recipients. Describe how you will communicate grant requirements to sub-recipients, and how you will keep sub-recipients informed of all significant policy, program, data collection, and performance developments and directives for which you are accountable. Describe how you will ensure that sub-recipients receive adequate resources to effectively operate local projects. Finally, describe the training that you will provide to increase their skills, knowledge, and abilities. Where applicable, include a description of the proposed staff training with dates, content, and potential participants. In completing this section, you need not provide specific information on your sub-recipients. For the purposes of this TEGL, the Department is interested in general procedures and practices you will utilize to manage and select your sub-recipients.

C. **<u>OAA sec. 514(e)(2), Special Consideration by National Grantees in Sub-recipient Selection.</u>** The 2006 Amendments articulate specific requirements for national grant applicants in selecting sub-recipients. In areas where a substantial population of individuals with barriers to employment exists, national grant applicants must describe how they will give special consideration to organizations (including former recipients of national grants) with demonstrated expertise in serving individuals with barriers to employment. As provided at OAA sec. 514(e)(1), individuals with barriers to employment include minority individuals, Indian individuals and individuals in the priority of service categories described at OAA 518(b)(2).

D. **<u>Project Monitoring</u>.** Explain the methods and procedures you will use to monitor and evaluate project activities and sub-recipients to determine whether such project activities and sub-recipients are in accordance with Federal guidelines and regulations and whether sub-recipients are meeting project goals and timetables. Respond to the following particulars:

> (1) Frequency of monitoring/evaluation visits to local projects;
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> (2) Person(s) responsible for monitoring and evaluation;
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> (3) Key programmatic, administrative, and financial aspects of the grant that you will evaluate;
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> (4) Monitoring tools that you will utilize;
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> (5) Methods for prescribing corrective action when necessary;
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> (6) Follow-up procedures to ensure that any identified problem has been remedied; and
>
> (7) Validation of sub-recipient reports.

E. **<u>Financial Monitoring</u>.** Describe how you will monitor the financial management system of local sub-recipients. The following particulars should be addressed:

> (1) Person(s) responsible for monitoring sub-recipient expenditures;
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> (2) Frequency of monitoring of expenditures;
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> (4) Training provided to sub-recipients to help them effectively manage their own expenditures;
>
> (5) Follow-up procedures to be used; and
>
> (6) Validation of financial reports.

F. File Maintenance. Describe how you maintain files for privacy. Also describe how your files are set up, including whether they are electronic or hard copy files. Include a description of how you will ensure that participant files are maintained for three (3) program years after the program year in which all follow-up activity for a participant has been completed.

You should describe how sub-recipients will protect personnel records, including the I-9 forms for all participants, to avoid identity theft and other violations of personal information. Specific steps should be outlined to assure that participant records are securely stored and access is limited to appropriate staff. If applicable, describe measures that you will take to protect the electronic storage and retrieval of personnel information.

If you are interested in using electronic media for record keeping, describe the safeguards that you will use to preclude tampering with the information and assurances that electronic signatures, Personal Identification Numbers (PINS), etc., belong to the individual who is certifying the information. If document authenticity can be assured and safeguarded, utilization of electronic media is an acceptable means of record keeping.

G. Audits. Describe audit coverage including plans to audit local projects as well as plans to audit the activities of headquarters. To the extent feasible, provide dates, possible audit firms and selection procedures for future audits. Provide specific references to the most recent audit. Include the name of the audit firm and the date.