ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 2-10, Change 1

- TO: STATE WORKFORCE AGENCIES STATE WORKFORCE LIAISONS STATE WORKFRCE ADMINISTRATORS STATE AND LOCAL WORKFORCE INVESTMENT BOARDS ALL YOUTHBUILD GRANTEES
- FROM: PORTIA WU /s/ Assistant Secretary
- **SUBJECT:** Further Clarification on the Use of YouthBuild Funds Provided by Separate Year Funding Appropriations
- 1. <u>Purpose</u>. To further clarify the use of YouthBuild funds expended under each Program Year's (PY) grant awards.
- 2. <u>References</u>.
 - Workforce Innovation and Opportunity Act (PL 113-128 July 2014), https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf
 - YouthBuild Final Rule, 20 CFR Part 672, https://www.federalregister.gov/articles/2012/02/15/2012-2373/youthbuild-program
 - Notice of Availability of Funds and Funding Opportunity Announcement (FOA) for YouthBuild Grants, FOA-ETA-16-10, https://www.doleta.gov/grants/pdf/FOA-ETA-16-10.pdf
- 3. <u>Background</u>. The Department of Labor (DOL) has awarded grants to organizations to operate YouthBuild programs since PY 2007. These organizations are funded for a three-year program cycle that includes two years of core program services and one year of required follow-up (including supportive services and tracking of participant outcomes). Many YouthBuild programs receive a new grant award every other program year (e.g. PY 2007, PY 2009, PY 2011, etc.) to fund a new and separate grant cycle of two years of program services and one year of required follow-up. This Training and Employment Guidance Letter (TEGL) clarifies the use of funds and enrollment of youth in overlapping program cycles (e.g. PY 2013).
- 4. <u>Enrollment of Youth</u>. If an organization receives a YouthBuild grant that overlaps with a previous YouthBuild program cycle, they must have a new and separate program cycle up and running with new and separate participants. **Youth enrolled and served with previous**

RESCI SSI ONS	EXPIRATION DATE
None	Continuing

program cycle funds may not be served with any portion of YouthBuild funds from subsequent grant awards simultaneously. If a youth dropped out of a previous program cycle for any reason prior to completion or graduation from the program, and if that youth was exited as an unsuccessful completer in DOL's Web-based Management Information System (MIS), then he/she could be considered a new enrollee in the subsequent grant cycle.

As an example, Grantee X received a YouthBuild award in 2013 and in 2015. Participant A enrolled in late 2014 and received services from the 2013 award, while Participant B enrolled in late 2015 and received services from the 2015 award. Participant A and Participant B may work on the same work site and attend the same classes and training sessions, but Grantee X must track and carefully distinguish expenditures of grant dollars for teacher time, work site trainer costs, construction materials, and other shared costs based on the number of participant A's costs to the PY 2013 award, whereas the grantee would charge Participant B's costs to the PY 2015 award. Grantees should be properly budgeting and allocating for grant award funds have been depleted, Grantee X may continue to serve Participant A using Grantee X's PY 2015 funding only by exiting Participant A as an unsuccessful exiter from the PY 2013 grant's MIS and subsequently reenrolling that participant as a new participant in the PY 2015 grant MIS.

It is the responsibility of the grantee to coordinate the cost allocation and budgetary tracking necessary to run programming for two separate groups of youth participants simultaneously if necessary and to ensure that funding for each program is accounted for separately and appropriately within each grant award. The grantee is responsible for separately tracking each grant award. The grantee must provide separate financial (ETA 9130), quarterly performance, and narrative reports covering the participants served under each grant award. A new ETA-9130 Form is required for each grant award. More than one ETA-9130 Form may be required if a grant award includes monies from more than one appropriation or Payment Management System subaccount number. Please also be advised that OMB has recently approved a new ETA-9130 Form which is expected to be implemented shortly. A copy of the new ETA-9130 form can be found at

https://www.doleta.gov/grants/financial_reporting.cfm.

5. <u>Inquiries</u>. Questions on this TEGL may be addressed to the appropriate ETA regional office.