

Fiscal Year 2017

Management Procedures & Guidelines

for Cooperative Agreements

*U.S. Department of Labor
Bureau of International Labor Affairs
Office of Child Labor, Forced Labor and Human Trafficking
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I. List of Acronyms

CFR	Code of Federal Regulations
CMEP	Comprehensive Monitoring and Evaluation Plan
CSEC	Commercial Sexual Exploitation of Children
DPMS	Direct Participant Monitoring System (formerly Direct Beneficiary Monitory System)
FCA	Federally Cognizant Agency
FFR	Federal Financial Report
FOA	Funding Opportunity Announcement
GAGAS	Generally Accepted Government Auditing Standards
GOR	Grant Officer's Representative
GPRMA	Government Performance and Results Modernization Act
HHS-PMS	Department of Health and Human Services Payment Management System
ILAB	Bureau of International Labor Affairs
ILO	International Labor Organization
M&E	Monitoring & Evaluation
MPG	Management Procedures and Guidelines
NICRA	Negotiated Indirect Cost Rate Agreement
NGO	Non-Governmental Organizations
OCD	Office of Cost Determination
OCFT	Office of Child Labor, Forced Labor and Human Trafficking
PIO	Public International Organization
PMP	Performance Monitoring Plan
SF	Standard Form
TPR	Technical Progress Report
USDOL	U. S. Department of Labor
VAT	Value Added Tax

II. Introduction

This document provides general management procedures and guidelines for cooperative agreements entered into by the U.S. Department of Labor's (USDOL) Bureau of International Labor Affairs/Office of Child Labor, Forced Labor and Human Trafficking (ILAB/OCFT). The cooperative agreement recipient (hereinafter referred to as "recipient") of USDOL funds from OCFT are subject to the requirements contained in these OCFT Management Procedures and Guidelines (MPG).

The MPG contains information that may not be explicitly detailed in the relevant Funding Opportunity Announcement (FOA) and/or terms and conditions of the cooperative agreement and provides examples of the format for deliverables. However, not all sections of the MPG will apply to all projects. In cases where the MPG and terms and conditions of award are not aligned, the terms and conditions of award take precedence. The recipient should contact USDOL if further clarification is necessary.

Note that USDOL may revise the OCFT MPG annually and/or as needed, and any new or revised provisions will apply to subsequent expenditures under this award. For the latest version of the OCFT MPG, please see the Grants and Contracts page, under Resources on the ILAB webpage: <https://www.dol.gov/agencies/ilab/resources/grants>.

Additionally, the recipient must comply with all applicable Federal regulations. The recipient also must have written internal policies and procedures (e.g., a PIO's or NGO's financial rules, regulations and procedures) and must document consistent use of those policies and procedures. See the [terms and conditions of award](#) for the order of precedence among these requirements. See also sections of [2 CFR Part 200](#) that address a recipient's right and responsibility to maintain their own internal controls (e.g. 2 CFR 200 Subpart D, 2 CFR 200.303, 2 CFR 200.400, 2 CFR 200.403).

III. Roles and Responsibilities

The principal purpose of the USDOL-recipient relationship is the transfer of money, property, services, or anything of value to the recipient in order to accomplish a public purpose of support or stimulation authorized by federal statute. Funds from this award provided to contractors and/or subrecipients are subject to relevant requirements, including those provided for in the USDOL cooperative agreement.

A cooperative agreement is a form of a grant where substantial involvement is anticipated between USDOL and the recipient during performance of the proposed activities. The level of monitoring and accountability required by USDOL is less than what is required in a contract, but more than in a regular grant.

USDOL's involvement focuses on elements that are essential to meet program requirements and assure achievement of program objectives. USDOL involvement may include but is not limited to the designation and approval of key personnel positions and the of key personnel; collaboration with the recipient in order to refine the project design and strategy; development and implementation of the baseline and follow-up survey methodology; development and implementation of a Comprehensive Monitoring and Evaluation Plan (CMEP) (or a Performance Monitoring Plan (PMP) in limited, designated cases); monitoring project implementation through work plans, progress reports, evaluations, attestation engagements, corrective actions, site visits or conference calls with the recipient; and approval of deliverables outlined in the cooperative agreement and MPG. USDOL may refine and approve any requests for modifications to the cooperative agreement, including technical or budget revisions.

IV. Project Implementation Requirements

The recipient must implement the project according to the applicable USDOL FOA, the terms and conditions of award, the recipient’s approved technical and cost proposal, and the approved Project Document (see Section 2.1). In addition, the recipient must adhere to the requirements and deliverables as described in the MPG, as applicable to the project.

1. General Timetable of Deliverables

Using the official period of performance date stated in the cooperative agreement as the base, the recipient will provide the following information/deliverables to USDOL, as applicable to the project and unless other deadlines or deliverables are specified in the applicable terms and conditions of award:

DEADLINE ¹	DELIVERABLE
INITIAL AND ONGOING IMPLEMENTATION DELIVERABLES	
Quarterly: January 30, April 30, July 30, October 30	Federal Financial Report (FFR) Standard Form (SF) 425
Semi-annually: April 30 and October 30	Technical Progress Report (TPR), with all required attachments
Quarterly: January 30 and July 30	Quarterly Status Report, with all required attachments. Only applicable to projects where USDOL has required a quarterly report.
Within 12 months of award and Bi-annually	Equipment and Real Property Inventory List submitted to Grant Officer
Within 30 days of award	Contact information for recipient provided to USDOL, including name, address, phone and email of point of contact at recipient headquarters and in the project country(ies).
Within 45 days of award	Written notification that key personnel have begun to work on the project.
Within 12 months of award	An inventory list of all equipment and real property purchased submitted to the Grant Officer.
Within 3 months of award	Initial Draft Project Document Package Draft Performance Monitoring Plan (PMP), only applicable to projects not participating in the CMEP process; refer to the terms of award.
Within 5 months of award	Final Project Document Package (for projects with PMP only; not participating in the CMEP process) Final PMP (for projects with PMP only; not participating in the CMEP process)
Within 6 months of award	Assessment of Safe and Healthy Learning Environment
Within 4 months of first CMEP workshop	Project Document Package (final draft) (for projects participating in the CMEP process)
Within 4 months of award and as applicable	Information on Proposed Funding to Host Country Governments and/or to Subawards.
Within 7 months of award and to be updated annually in October TPR	Sustainability strategy

¹ All deadlines specified therein refer to calendar days. If a particular calendar day falls on a weekend or holiday the deadline will refer to the following business day.

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DEADLINE ¹	DELIVERABLE
M&E DELIVERABLES	
Within 3 months of award	First Draft of Child Labor and/or Forced Labor Definitions submitted (as applicable) Scope of Work for Pre-Situational Analysis (PSA) submitted (as applicable)
Within 4 months of award	First Draft of Terms of Reference (TOR) for Baseline Survey submitted (as applicable)
Within 1 month of submission of the first draft of TOR	TOR for Baseline Survey or Scope of Work for Pre-Situational Analysis finalized and approved by USDOL (Please note: The TOR/Scope of Work cannot be posted for procurement until approved by USDOL)
Within 3 months of submission of the first draft of the definitions	Definitions of Child Labor or Forced Labor finalized and approved by USDOL (Please note: Data collection for the prevalence survey, if applicable, cannot begin until the definitions are finalized)
Within 7 months of award	Final Baseline Survey Methodology Package accepted by USDOL (Please note: Enumerator training, piloting and data collection cannot be started until the final methodology package is approved by USDOL)
TBD based on coordination with USDOL and as applicable; generally within 9 months of award	Pre-situational analysis completed and draft and final reports submitted) (Please note: final report must be approved by USDOL)
TBD based on coordination with USDOL; generally within 12 months of award	Final CMEP submitted
Within 6 months of final baseline survey methodology package	First Draft of Baseline Survey Report
Within 3 months of the first draft of baseline survey report	Baseline Survey Report and Data Package Finalized and Approved by USDOL
Within 1 month of finalization of either baseline (prevalence survey) report OR pre-situational analysis report	Strategy Review Memo submitted.
Within 3 months of finalization of interim evaluation report	Review of CMEP indicators and targets based on interim evaluation report, mid-project CMEP check-in completed, and CMEP revision submitted (as applicable) (Please note: mid-CMEP check-in must be documented and completed in consultation with USDOL)
At least 12 months prior to the end of the cooperative agreement	First Draft of TOR for Follow-up Survey submitted. (As applicable) (Please note: The TOR cannot be posted for procurement until approved by USDOL)
Within 1 month of submission of the first draft of TOR	TOR for Endline Survey finalized and approved by USDOL (Please note: The TOR cannot be posted for procurement until approved by USDOL)
At least 10 months prior to the end of the cooperative agreement	Follow-up Survey Methodology Package finalized and approved by USDOL (as applicable) (Please note: Enumerator training, piloting, and data collection cannot be started until the final methodology package is approved by USDOL)

DEADLINE ¹	DELIVERABLE
At least 4 months prior to the end of the cooperative agreement	First Draft of Follow-up Survey Report (Please note that the Follow-up Survey Report must not only discuss the endline results but also compare them to the baseline data).
At least 1 month prior to the end of the cooperative agreement	Follow-up Survey Report and Data Package finalized and approved by USDOL
6 months prior to end of the cooperative agreement	Project submits plan for End of Project Results Analysis to USDOL (Please note: the End of Project Results Analysis will be due with the Final Technical Progress Report)
CLOSEOUT DELIVERABLES	
At least 120 days prior to the end of the cooperative agreement period	Government Property Inventory Disposition Request; inventory list of all real property, equipment with an acquisition value of USD 5,000 or more per unit, and supplies if aggregate value exceeds USD 5,000.
Within 90 days after the end of the cooperative agreement period	Submittal of Closeout Documents Checklist; Final Technical Progress Report; Final Quarterly FFR/SF-425; Closeout Financial Form; Recipient’s Release Form; Recipient’s Assignment of Refunds, Rebates, and Credits Form; Government Property Closeout Inventory Certification.

2. Required Project Components

2.1. Project Document Package

The recipient is required to carry out a review of the project strategy and project budget included in their proposal and produce a Project Document Package, in consultation with OCFT. This consists of the project design elements, full project life-cycle work plan, and outcome-based budget. Operating within the scope of the approved proposal, the OCFT Grant Officer’s Representative (GOR), as named in the cooperative agreement, will be involved in the development, review, and approval of the Project Document Package. The initial draft of the Project Document Package must be produced within deadlines established in the General Timetable of Deliverables. The outcomes of the first CMEP workshop (as applicable) may necessitate additional revisions to the Project Document Package; the final version of the Project Document Package must be submitted within deadlines established in the General Timetable of Deliverables. The final Project Document Package (which may include refinements to the project strategy/budget) is subject to final approval by the GOR and Grant Officer. Following that review process, if further refinement of the project strategy or budget are determined to be needed by the recipient or OCFT, the recipient will be required to consult with the GOR in preparing and then submitting a Project Revision Request to the Grant Officer proposing refinements to the project strategy and budget. In such circumstances, the recipient must submit a Project Revision request, as described in the [Project Revisions](#) section below.

2.2. Information on Proposed Funding to Host Country Governments and/or Subawards

The recipient must submit information on any funds going to host country governments for prior approval. Information on funds used for procuring goods and services from non-governmental entities, such as supplies, equipment, rent, and other administrative services, is not needed for prior approval purposes, but should be included in the budget and budget narrative as needed. Information on funds used for third-party entities to perform a substantive part of the project, but not approved as part of the original award, is needed for prior approval.

All funds provided to host country governments require prior approval by USDOL regardless of whether the transaction is a subaward or a contract (see [section XII.3](#) for more information). For more

information on [Subawards and Contracts, see section XII.2.](#)

2.3. Recipient Post-Award Baseline and Follow-up Prevalence Surveys

OCFT requires projects with direct project participants to conduct quantitative baseline and follow-up surveys to calculate an area-based child labor prevalence rate and to understand changes in key variables that occur during the life of the project. Awardees conducting baseline and follow-up prevalence surveys must adhere to all requirements stated in OCFT's Baseline and Follow-up Prevalence Survey Guidelines (available at <https://www.dol.gov/agencies/ilab/resources/grants>).

2.4. Recipient Post-Award Pre-Situational Analysis

For policy, awareness-raising, and capacity-building projects with no direct-service component, OCFT may require in the cooperative agreement that the project conduct a pre-situational analysis (PSA). The nature of the PSA will vary from project to project, and specific designs must be discussed and agreed with OCFT. The PSA may be composed of a number of different activities, and is meant to provide a better understanding of the operating environment and suitability of project strategies. In collaboration with OCFT, projects may decide to incorporate existing, planned activities into pre-situational analyses in lieu of conducting a separate PSA activity. A resource on designing and conducting a PSA is available for grantees' optional use at <https://www.dol.gov/agencies/ilab/resources/grants>.

2.5. Project Strategy Review based on Baseline Prevalence Survey or Pre-Situational Analysis Findings

In consultation with OCFT, recipients shall use information gathered by a baseline prevalence survey or pre-situational analysis to propose adjustments in the project document package, as appropriate. This may be in addition to adjustments that are made during the CMEP process (see section 2.4 below on CMEP). Within one month of completing the baseline or pre-situational analysis report, the recipient must review the findings in the report to determine whether any modifications to the project document package are needed in light of new information about the project's implementing environment, or target population or areas. The recipient must prepare a brief memo, documenting how the recipient interprets the findings of the survey/analysis and explains how it affects project strategies.

In the case that the recipient determines that the implementation strategy or budget should be revised, the recipient should contact the GOR to determine whether a Project Revision is necessary. If it is determined that a Project Revision is necessary, the Recipient must submit a Project Revision request, as described in [Project Revisions](#), to the GOR.

2.6. Comprehensive Monitoring and Evaluation Plan (CMEP)/Performance Monitoring Plan (PMP)

As specified in the terms and conditions of award, for projects that include a CMEP, the recipient must collaborate with OCFT and, for designated projects, a USDOL External M&E Expert to develop a CMEP within the timeline established in the General Timetable of Deliverables (in Sec. IV. 1.). In general, CMEPs are required for direct service, awareness-raising, policy and capacity-building projects. The CMEP is a tool to integrate and guide the process of monitoring, evaluating, and reporting on project progress toward achieving intended results and outcomes, and to inform and support project management and implementation, management decisions, and mid-course corrections. It promotes a strong link between project monitoring and evaluation activities, including establishing timelines for these activities so that they inform and build on one another and provide a full feedback loop. A full CMEP Guidance Document outlining the purpose and components of a CMEP, the development process, and an overview of OCFT M&E terminology and concepts can be found at <https://www.dol.gov/agencies/ilab/resources/grants>. Recipients are responsible for adhering to all the requirements stated in the CMEP Guidance Document, unless otherwise stated in the cooperative agreement.

Some projects require only a PMP in place of the full CMEP; recipients should refer to their particular FOA and cooperative agreement to determine whether a PMP is required in lieu of a CMEP. The draft PMP must be finalized in consultation with OCFT in accordance with the timeline laid out in the General Timetable of Deliverables (in Sec. IV. 1.).

CMEPs/PMPs must include the applicable OCFT common performance indicators and project-specific indicators to monitor the work status of children. The CMEP also will incorporate the child labor and/or forced labor definitions developed for the baseline and follow-up surveys or other project activities (as applicable to the project), and will document how the project will define and measure the work and education status of participants under its Direct Participant Monitoring System (previously Direct Beneficiary Monitoring System), if applicable. OCFT's Companion Guide to the USDOL Common Indicators, Guidance for Developing Project-Level Child Labor Definitions, and Direct Participant Monitoring System Guidelines (for direct services projects) are available at <https://www.dol.gov/agencies/ilab/resources/grants>.

2.6.1. CMEP Revision Process

CMEPs may be revised as needed during the life of the project, in accordance with the following guidance:

- In cases of minor modifications to the CMEP, such as small alterations in indicator wording or M&E management processes internal to the project, projects must notify the GOR of any and all changes and then submit a revised CMEP.
- Substantial changes that alter targets, involve major changes to indicator wording, add or remove indicators, involve major revisions to written sections of the CMEP, or affect the scope of the project (including changes to major project activities) must be discussed with and approved by the OCFT GOR and M&E staff point of contact, and then a revised CMEP must be submitted for full review and approval by USDOL. The OCFT GOR also will advise if a proposed CMEP revision requires a formal project modification to be approved by the Grant Officer.

2.6.2. Mid-Project CMEP Review and Check-In

Within the timeline established in the General Timetable of Deliverables (in Sec. IV. 1.) for completion of the interim project evaluation, the project must undertake a review of CMEP indicators and targets, using feedback provided in the interim evaluation report, and submit a revision of the CMEP as applicable. The project also should conduct a mid-project CMEP check-in with USDOL, which should include a review of any CMEP revisions, data quality to date, and overall implementation and usage of the CMEP.

2.7. Participant Selection Criteria and Monitoring

For project providing direct education or livelihoods services (or referrals to those services), recipients must develop specific criteria for selecting participants, based on the project child labor and/or forced labor definitions developed, as well as factors such as geographic areas of focus, common risk factors, and criteria relevant to the nature of the service. Selection criteria for participants receiving direct services or referrals may be refined in consultation with OCFT as a result of baseline prevalence survey data collection. Projects targeting youth age 18 and older are subject to criteria outlined in the FOA and consultation with OCFT to develop acceptable criteria for participant selection.

In addition, recipients that provide direct services or referrals to participants are responsible for developing a Direct Participant Monitoring System (DPMS). The DPMS will be developed by the recipient at the same time as the CMEP, in consultation with USDOL. The work and education status of children must be included in the DPMS and be monitored and reported on every 6 months. The recipient will be responsible for managing the DPMS. Projects targeting youth age 18 and older, or migratory populations, are subject to criteria outlined in the FOA and consultation with OCFT to develop an

acceptable and applicable DPMS. OCFT's Direct Participant Monitoring System Guidelines are available at <https://www.dol.gov/agencies/ilab/resources/grants>.

2.8. Safe and Healthy Learning Environments

USDOL supports the provision of safe and healthy learning environments. USDOL expects that its recipients will seek to ensure that goods, services, and schools and other learning environments (including restroom facilities) sponsored by and/or associated with the recipient, partner, and/or subrecipient or subcontractor are safe and pose no threat to the mental or physical well-being of project participants.

For all projects providing education services to either adults, children, or both, the recipient is required to conduct a needs assessment of learning environments and develop a plan to inspect schools and other learning environments attended by direct participants; identify those with conditions that present risk of illness or injury to the health or safety of the children; and, if risks are identified, develop and implement an action plan for mitigating such risks during the life of the project.

If, after conducting the required needs assessment and inspection of schools and other learning environments attended by direct participants, the recipient determines that additional funding for construction beyond the initially approved amount is needed in order to make schools or other learning environments safe and/or protect the health of the project's direct participants, the recipient should notify the GOR as soon as possible. Funding for construction must not exceed 10 percent of the project budget without prior approval by the Grant Officer. Recipients unable to adhere to this threshold given the state of school conditions must (1) use alternative sites for the delivery of project services or 2) propose a Budget Revision that would allow for the reallocation of sufficient project funding to cover the costs of improvements needed to ensure the provision of safe and healthy learning environments for children. See the [Budget Revisions](#) and [Construction](#) sections below.

2.9. Sustainability Strategy

Recipients must submit to the GOR their strategy for promoting sustainability, including a strategy for building local capacity as a means to promote the sustainability of efforts to combat child labor and/or forced labor beyond the life of the project, within the timeline established in the General Timetable of Deliverable (in Sec. IV. 1.). Recipients' strategies should explain which of the project's specific objectives will be sustained after the project ends and how they will be sustained. Recipients must provide updates to their sustainability strategy annually as part of each October TPR. The assessment to prepare the sustainability strategy must be linked to project impact and the ability of individuals, communities, and the nation to ensure that the key activities or changes implemented by a project endure, and that organizations critical to these efforts have the capacity to maintain and/or expand them.

Although, there are restrictions on the award of subawards or contracts to government entities, to the extent possible, recipients should consider engaging relevant government agencies through other mechanisms, as well as partnering with other organizations or associations to strengthen their capacity in areas including advocacy and awareness-raising on child labor and/or forced labor issues. As part of a sustainability strategy, recipients should also aim to work with companies and/or industry groups to develop and/or improve their voluntary social compliance practices regarding child labor and/or forced labor.

2.10. Research

In projects where the recipient is required to conduct project-specific research, the recipient is expected to implement the research proposed in their application, subject to final approval by the GOR, during project implementation. However, USDOL recognizes that the need for different or additional research topics may be discovered during project implementation, including after conducting the [Baseline Prevalence Survey](#). The recipient is encouraged to contact the GOR to present new research

suggestions and request approval for any change to the approved research topics.

As needed, recipients should consider engaging local research organizations, especially universities to design and conduct the proposed research activities, following competitive procurement requirement as applicable. The recipient's dissemination strategy should ensure that the project's research outputs, including data sets and reports, are publicly available and endure beyond the life of the project. USDOL expects recipients to implement dissemination strategies that will ensure that research is widely distributed and available to the public, including through the use of creative means such as Web-based platforms. Dissemination strategies should be practical and appropriate, given the implementing environment and cultural and social context in target areas. The recipient must provide a justification for the research design (qualitative, quantitative, and/or mixed-methods). Proposed research methodologies are subject to final approval by the GOR.

All research conducted using USDOL funding must be summarized into a report and presented to the GOR for review prior to publically disseminating results and official publication. At minimum, the report must include the research purpose, research questions, sample, methodology, data analysis, and findings. All research reports must include a cover page with the title, date, author, publishing organization and adhere to USDOL's funding acknowledgement requirements. Once reviewed and approved by the GOR, recipients must disseminate their findings publicly, unless an alternative plan for dissemination has been confirmed with the GOR. See the [Information Dissemination and Intellectual Property](#) (in Sec. VI. 6.) for more information.

Recipients should also note that research activities should not be included in the M&E budget, and must be budgeted for separately.

V. Project Reporting Requirements

The following procedures satisfy U.S. Government reporting requirements and those related to the Government Performance and Results Modernization Act (GPRMA).

1. Technical Progress Reports

TPRs must be sent electronically to the GOR by the deadlines in General Table of Deliverables. If the recipient cannot submit a report by the deadline, the recipient is expected to inform the GOR by email at least 10 days before the required deadline of the cause for the delay and the date when the report is expected to be submitted.

Technical progress reports are meant to serve as an official record of project progress and performance, including progress towards all indicators in the Performance Monitoring Plan. A TPR format is provided at <https://www.dol.gov/agencies/ilab/resources/grants>. Attachments that cannot be sent electronically must be sent in hard copy by mail (accompanied by an email message alerting the GOR of its pending arrival).

USDOL may follow-up on information provided in reports with comments or additional questions to the recipient. In these cases, the recipient may be requested to respond to USDOL comments within a timeframe specified by the GOR.

1.1. Quarterly Status Reports

USDOL may require quarterly technical Status Reports in addition to the semiannual TPRs. In the event that quarterly reporting is required, USDOL will communicate this requirement to the recipient in writing. Quarterly Status Reports should follow the same format as the TPRs and include the same attachments.

Quarterly Status Reports must be submitted to the GOR by the recipient no later than January 30 and July 30, covering a 3-month period, as indicated in Table 2.

Table 2. Quarterly Status Report Timeline

Report	Report Period	Submission Deadline
July Status Report	April 1-June 30 (3 months)	July 30
January Status Report	October 1-December 31 (3 months)	January 30

1.2. Work Plan

The recipient is responsible for submitting an updated Work Plan for the life of a project as an Annex to each TPR. The Work Plan should identify major project activities (including M&E activities²), deadlines for completing these activities, and person(s) or institution(s) responsible for completing these activities. Updates should include any significant change in a planned project activity or the activity implementation timeframe.

1.3. Final Technical Report

The recipient must submit a Final Technical Report to the GOR, using the required TPR format available at <https://www.dol.gov/agencies/ilab/resources/grants>, no later than 90 days after the project completion date.

The Final Technical Report is a stand-alone report that provides a complete and comprehensive summary of the progress and achievements made during the total life of the project. The cover page must include actual dates for evaluations and a revised completion date, if applicable. The latest Work Plan and the CMEP (including all components) must be submitted along with the report. The report must also include information on the closeout process, including the dates that subawards were closed and the financial closeout (including plans for property disposition at the end of the project). For regional projects, the report is expected to include an estimate of total expenditures per country.

Final Technical Reports are expected to provide the following specific information:

- An assessment of achievement in terms of efficiency, effectiveness, relevance, sustainability, and interrelationships between objectives. If information is missing or not applicable, the recipient should indicate and explain why in a footnote. A narrative assessment is expected to be provided for each indicator.
- A table including the actual life-of-project reporting figures for project participants. These numbers must be consistent with what has been reported in the Common Indicator Tracking Forms for GPRMA. If the numbers differ from those previously reported, the recipient must explain a) the changes to the figures and b) the reason for change.
- A final and complete list of subawards, including the name of the funded entities, activities or services performed, program duration, the approved budget, actual expenditures, delivery rate, date of closeout, and any additional remarks.
- An assessment of project sustainability as outlined in the recipient's sustainability strategy. The assessment must be linked to project impact and the ability of individuals, communities, and nation to ensure that the activities or changes implemented by a project endure.

2. Reporting Problems Encountered

The recipient is expected to notify the GOR immediately of any developments, problems, delays, or adverse conditions that may have a significant impact on project implementation or which may materially

² Refer to CMEP guidance document section Sec. IV. 6 for list of M&E activities to include.

impair the recipient's ability to meet the project objectives. The recipient is also expected to identify such issues in their TPRs. USDOL will work with the recipient to monitor and resolve any issues as necessary.

Additionally, should any information, suspicion, or allegation relating to waste, fraud, or abuse of USDOL funds come to the attention of the recipient, the recipient must contact the GOR immediately. The recipient must describe in writing any action taken, or contemplated to be taken, to investigate, and, if necessary resolve the situation, and a timeframe for doing so.

2.1 Corrective Action

USDOL may require the recipient to participate in a Corrective Action process, in response to concerns about the project performance. Depending on the extent and nature of the concern with the project performance, USDOL may resolve issues and concerns through a variety of methods, including but not limited to: issuing a Corrective Action Letter; placing Special Conditions on the award; conducting oversight site visits; requesting additional conference calls or meetings; directing an attestation engagement of the cooperative agreement (see section XI); requesting the grantee to develop and implement a Corrective Action Plan; requiring quarterly Status Reports; requesting additional documentation; and/or requiring revised Work Plans. USDOL may take additional actions as necessary to monitor project performance more frequently and in more detail. See 2 CFR 200.207 Specific conditions and 2 CFR 200.338 Remedies for noncompliance.

3. Financial Reports

3.1 Quarterly Federal Financial Report SF-425

All recipients must submit quarterly financial reports using the FFR/SF-425 throughout the period of performance of the cooperative agreement. The FFR/SF-425 indicates the status of funds at the project level. The recipient must submit an updated FFR/SF-425 electronically through both the Department of Health and Human Services Payment Management System (HHS-PMS) and the *E-grants* system no later than 30 days after the end of each quarter as outlined below in Table 3. See [Annex II: Federal Financial Report \(sample\)](#) for an example of an SF-425. Refer to the HHS-PMS website for information on HHS-PMS reporting requirements, help resources and more:

https://www.dpm.psc.gov/grant_recipient/grant_recipient.aspx?explorer.event=true.

Table 3. FFR/SF-425 Timeline

Report Period	Submission Deadline
October 1 – December 31	January 30
January 1 – March 31	April 30
April 1 – June 30	July 30
July 1 – September 30	October 30

3.2 Cost Sharing/Matching Funds/In-Kind Contributions

Cost sharing, matching funds or in-kind contributions are not required for OCFT programs. Any cost sharing, matching and/or in-kind contributions included in the recipient's Application for Federal Assistance, SF-424, must comply with requirements described in 2 CFR 200.306.

Committed cost sharing, matching or in-kind contributions must be reported quarterly in the FFR/SF-425. Such cost share, matching or in-kind contributions must abide by the same restrictions as funds awarded by USDOL. In addition, the recipient is required to obtain USDOL approval to report direct participants for GPRMA purposes when the participant services are not fully funded by USDOL.

If a recipient elects to commit cost sharing, matching or in-kind contributions, including funds from subrecipients, such contributions must be used to support the work of the project or defray its costs.

Applicants may not make subawards contingent upon a subrecipient agreeing to provide cost sharing, matching or in-kind contributions.

In addition to the guidance set forth in 2 CFR 200.306(b), for Federal awards from the Department of Labor, the recipient must account for funds used for cost sharing or match within their accounting systems as the funds are expended.

3.3 Final Federal Financial Report SF-425 and Closeout Financial Form

A final FFR/SF-425 quarterly report and a Closeout Financial Form must be submitted electronically through the *E-grants* system no later than 90 days following completion of the cooperative agreement period.

3.4 Additional Financial Reporting

Per 2 CFR 200.207, USDOL may ask the recipient to submit on a case-by-case basis, an update of the project's detailed outcomes-based budget, or a Federal Financial Report SF-425 that provides information on total allocations, expenditures, commitment of balances and project balance by budget categories identified in SF-424A (Budget Information Form).³

4. Inventory List of all Equipment and Real Property

The recipient must submit an inventory list of all equipment and real property to the Grant Officer within the timeline established in the General Timetable of Deliverables, at any time that additional equipment or real property is purchased with project funds, and at least once every two years, consistent with the regulations applicable to "Property Standards" at 2 CFR 200, Subpart D – Post Federal Award Requirements (see [Annex IV: Inventory List Template \(Sample\)](#)).⁴

The Inventory must also be submitted as part of the project closeout. See [Project Closeout Procedures](#) below.

VI. Communication

Effective communication is essential to the successful collaboration between USDOL and the recipient. Both parties are expected to keep the other fully informed of project-related issues.

The recipient's primary point of contact with USDOL regarding technical matters is the OCFT GOR, as named in the relevant terms and conditions of award. In some instances, there may be a different individual other than the GOR responsible for oversight of the cooperative agreement. In these circumstances, USDOL will specify the recipient's primary point of contact within OCFT. If the recipient is unable to contact the primary point of contact, the recipient is advised to communicate with the relevant OCFT Division Chief.

1. Formal Communication

Within 30 days of award, the recipient must designate a person(s) who will serve as the point of contact at their headquarters. The name of a point person(s) in the field shall also be identified.

All formal communication will be in writing, by post, fax, or email, between USDOL and the recipient's

³ A sample SF-424A is available at: <http://apply07.grants.gov/apply/forms/sample/SF424A-V1.0.pdf>.

⁴ **Equipment** means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. (2 CFR 200.33).

headquarters, if applicable. Any correspondence sent by mail or courier to USDOL should be accompanied by an email message to the GOR alerting USDOL of its pending arrival. Any mail or courier delivery should be addressed to the GOR at:

U.S. Department of Labor,
Bureau of International Labor Affairs, Room S-5317
200 Constitution Avenue, NW
Washington D.C. 20210
United States

In addition, either party (the recipient or USDOL) may request a telephone conference consultation at any time to discuss project-related matters.

2. Press Communication

To the extent possible, the recipient must inform the GOR and the US Embassy in advance of press releases, major press events, and/or interviews. The recipient should make every effort to inform OCFT and the US Embassy with as much advance notice as practicable. The recipient should provide OCFT with copies of all press releases, as well as copies of press articles and notification of media or internet broadcasts.

3. Responding to Allegations about the Project

If problems or allegations about the project are reported, USDOL expects to consult with the recipient to determine the proper and most efficient manner to respond to news stories and other issues affecting the project. USDOL expects to work together with the recipient, where appropriate, to resolve such matters. See [Reporting Problems Encountered](#).

4. Guidelines for Acknowledgment of USDOL Funding and USDOL Disclaimer

The recipient must acknowledge USDOL funding support in all publications, announcements, speeches, and press releases that describe the project or relate to, project activities. The acknowledgement must be as follows:

Funding is provided by the United States Department of Labor under cooperative agreement number IL-XXXXX.

In addition, the recipient is required to include a disclaimer in publications, reports, and other materials that have been directly funded by USDOL and that are produced, edited and published for distribution beyond the recipient and USDOL (i.e., to other donors, organizations, or the general public) as follows:

This material does not necessarily reflect the views or policies of the United States Department of Labor, nor does mention of trade names, commercial products, or organizations imply endorsement by the United States Government. XX percentage of the total costs of the project or program is financed with Federal funds, for a total of XX dollars.

If there are any reasons preventing the recipient from including the USDOL acknowledgment or disclaimer in the publications, reports, or other materials listed above, the recipient must discuss the issue with the GOR prior to publication to obtain appropriate guidance from the Grant Officer on the matter.

Subject to prior USDOL approval, the recipient may apply the USDOL seal to USDOL-funded material prepared for distribution, including posters, videos, pamphlets, research documents, national survey reports, impact evaluations, best practices reports, and other publications of global interest. The recipient must consult with the GOR with sufficient advanced notice on whether the seal may be used on any such

items prior to final draft or final presentation for distribution. The recipient must obtain USDOL written permission before placing the USDOL seal on any item.

5. Social Media

Recipients utilizing social media to share information regarding USDOL-funded projects must provide OCFT with the appropriate URLs to access this information. This information is subject to the requirements of [Guidelines for Acknowledgment of USDOL Funding and USDOL Disclaimer](#) above. USDOL reserves the right to request the recipient to remove any material regarding USDOL-funded projects it deems inappropriate.

6. Information Dissemination and Intellectual Property

The recipient must make select USDOL-approved project materials and research outputs available to the public via the recipient's Web site or other means within 45 days of availability of such project materials or completion of each output. The recipient will inform the GOR of the dissemination plan and notify the GOR prior to publication.

Select materials and research outputs include, but are not limited to, 1) project abstracts; 2) baseline and follow-up prevalence survey reports; and 3) rapid assessments. The GOR will inform the recipient of any additional project-specific materials or research outputs that must adhere to this requirement. In so doing, the recipient disseminates information about child labor and/or forced labor in the project country(ies) and promotes both best practices in combating child labor and/or forced labor, as well as cooperation with other child labor and/or forced labor-related projects. Distributing project information and collected data allows awareness raising objectives to be met and also provides raw data to enable future research. However, if the recipient believes that any such materials should not be made publicly available, the recipient must inform and obtain the GOR's agreement in writing.

All published documents must comply with Section 508 of the Rehabilitation Act of 1973, as amended. Recipients must format these documents into a publication-ready document for the final draft submission to the GOR. Publication-ready means the report is formatted for Section 508 compliance, does not disclose personally identifying information about the researcher or the interview subjects, is well-written in English, and is free of typographical errors. For more information on compliance with Section 508 of the Rehabilitation Act, see <http://www.section508.gov> and <http://www.access-board.gov>.

The recipient may copyright works created or for which ownership was purchased with USDOL funds; however, USDOL reserves a royalty-free non-exclusive and irrevocable right to obtain, copy, publish, or otherwise use such works for Federal purposes and to authorize others to do so.

USDOL reserves a paid-up, nonexclusive and irrevocable license to reproduce, publish, or otherwise use, and to authorize others to use for Federal purposes: i) the copyright in all products developed under the award, including a subrecipient; and ii) any rights of copyright to which the recipient, subrecipient or a contractor purchases ownership under an award (including, but not limited to, curricula, training models, technical assistance products, and any related materials). Such uses include, but are not limited to, the right to modify and distribute such products worldwide by any means, electronically or otherwise. The recipient may not use Federal funds to pay any royalty or license fee for use of a copyrighted work, or the cost of acquiring by purchase a copyright in a work, where the Department has a license or rights of free use in such work. If revenues are generated through selling products developed with award funds, including intellectual property, these revenues are program income. Program income is added to the award and must be expended for allowable activities. Additionally, the Federal government has the right to require intellectual property developed under a competitive Federal award process to be licensed under a Creative Commons Attribution license. This license allows subsequent users to copy, distribute, transmit and adapt the copyrighted Work and requires such users to attribute the Work in the manner specified by the recipient.

7. Coordination with Key Stakeholders

Establishing positive relationships is especially important in avoiding duplication of efforts and building synergies between organizations working in the same issue area. The recipient is expected to work with the ILO, other USDOL recipients, and other key stakeholders, including (as applicable): public international organizations (PIOs); non-governmental organizations (NGOs); national steering/advisory committees on child labor and education and/or forced labor; faith and community-based organizations; trade unions, employers' and teachers' organizations; children engaged in child labor and/or forced labor and their families; and, if relevant, adults engaged in forced labor. To the greatest extent possible and practicable, the recipient must coordinate with existing projects in the target country, particularly those funded by USDOL. The recipient is expected, when applicable, to coordinate with projects funded by other U.S. Government agencies, such as the U.S. Agency for International Development (USAID), the U.S. Department of State, Millennium Challenge Corporation (MCC), and the U.S. Embassy in the target country(ies).

8. Communication with U.S. Embassies

The recipient is expected to inform and invite the U.S. Embassy to all major events undertaken as part of the project and maintain communication with Embassy staff, copying the USDOL GOR on all correspondence.

In instances of project implementation problems, the recipient must first discuss such problems with OCFT, including any possible need for Embassy assistance in instances such as customs and VAT exemptions. Depending on the nature of the problem, USDOL will then decide whether USDOL will communicate directly with the Embassy on the issue or allow the recipient to inform the Embassy.

VII. Personnel

1. Conflict of Interest

Recipients must disclose all potential real and apparent conflicts of interest described in 2 CFR 200.318 in writing to the Grant Officer as required by 2 CFR 200.112.

Sample statement of no conflict of interest:

I acknowledge that I have been selected to participate in the project IL-XXXXX as a person involved in the procurement/purchasing process. To the best of my knowledge, I certify that neither I nor my spouse, domestic partner, dependent children, members of my household, immediate family nor personnel with whom I am seeking employment, have any direct or financial interest in any of the firms submitting proposals or in their proposed subcontractors, or have any other beneficial interest in such firms except as fully disclosed on an attachment to this certification.

2. Key Personnel

Individuals who have been designated as key personnel (e.g., Project Director, Education Specialist, Livelihood Specialist and Monitoring and Evaluation Officer), must be available to begin work on the project no later than 45 calendar days after cooperative agreement award, unless otherwise stated in the cooperative agreement. All key personnel must allocate the designated level of effort as stated in the terms and conditions of award or respective FOA. Key personnel positions may not be combined.

The recipient must inform the GOR immediately in the event that key personnel cannot continue to work on the project as designated. In such cases, the recipient is expected to nominate new personnel, through the submission of a formal project revision (see [Project Revisions](#)). The recipient must obtain prior approval from the Grant Officer before any change to key personnel is formalized. If the recipient is unable to propose a replacement for a key personnel position that both meets the requirements of the

position as outlined in the FOA and is acceptable to the Grant Officer, the Grant Officer reserves the right to terminate the cooperative agreement or disallow costs.

VIII. Payments

1. Health and Human Services (HHS) Payment Management System (PMS)

Funds must be drawn down by the recipient through the Health and Human Services (HHS) Payment Management System (PMS) via computer with SMARTLINK capability. When approved, funds may be transferred electronically to the recipient's financial institution as arranged with HHS. A revised direct deposit form must be submitted whenever there are changes in financial institutions and/or approved signatures.

Advanced payments are authorized provided the recipient maintains or demonstrates the willingness to maintain: Written procedures that minimize the time elapsing between the transfer of funds and disbursement by the recipient. Financial management systems that meet the standards for fund control and accountability as established in 2 CFR Part 200 and 2 CFR Part 2900 Subpart D—Post Federal Award Requirements Standards for Financial and Program Management.

The amount of advances requested must be based on actual and immediate cash needs in order to minimize federal cash on hand in accordance with policies established in 2 CFR 200.305 and 2 CFR 2900.7, Payment. In the event that the recipient accrues interest above \$500 per year on funds from this award, such interest must be returned to USDOL.

The Grant Officer may, after providing due notice to the recipient, discontinue the advance payment method and allow payments only by reimbursement when a recipient receiving advance payments demonstrates unwillingness or inability to establish procedures to minimize the time elapsing between the receipt of the cash advance and the disbursement thereof.

See 2 CFR 200.305 and 2 CFR 2900.7, Payment

2. Recipient Financial Management Systems

Recipient financial management systems shall provide for the requirements named in 2 CFR 200.302 Financial Management, including:

- Identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received. Federal program and Federal award identification must include, as applicable, the CFDA title and number, Federal award identification number and year, name of the Federal agency, and name of the pass-through entity, if any.
- Accurate, current, and complete disclosure of the financial results of each federally-sponsored project or program. Though USDOL requires reporting on an accrual basis, the recipient may not be required to establish an accrual accounting system. The recipient may develop such accrual data for its reports on the basis of an analysis of the documentation on hand.
- Records that identify adequately the source and application of funds for federally-sponsored activities. These records must contain information pertaining to federal awards, authorizations, obligations, unobligated balances, assets, outlays, income and interest.
- Effective control over and accountability for all funds, property and other assets. The recipient must adequately safeguard all such assets and assure they are used solely for authorized purposes.

- Comparison of outlays with budget amounts for each award. Whenever appropriate, financial information should be related to performance and unit cost data.
- Written procedures to minimize the time elapsing between the transfer of funds to the recipient from the U.S. Treasury and the issuance or redemption of checks, warrants or payments by other means for program purposes by the recipient.
- Written procedures for determining the allowability of costs in accordance with the provisions of the applicable federal cost principles and the terms and conditions of the award.
- Accounting records including cost accounting records that are supported by source documentation.

Refer to the HHS-PMS website for information on reporting requirements, help resources and more: https://www.dpm.psc.gov/grant_recipient/grant_recipient.aspx?explorer.event=true.

IX. Project Revisions and Use of Funds

Recipients may request a Project Revision to modify their cooperative agreement when technical or budgetary changes are necessary for the project to meet its objectives. Examples of changes requiring a modification to the cooperative agreement include, but are not limited to, a time extension to the cooperative agreement period, a change in key personnel, or changes to the budget above the annual threshold (see [Budget Revisions, below](#)).

The GOR is expected to submit a written response electronically to the recipient within 15 days after receipt of the revision request, acknowledging receipt, providing, comments, and/or requesting additional information. However, the revision is not considered approved until the recipient has received a Grant Modification signed by the Grant Officer, and no changes to project activities or spending under a revision may be implemented prior to the signed Modification.

Formal revision requests may be submitted to the GOR no later than six months before the end of the period of performance of the cooperative agreement. Only in exceptional cases will USDOL consider a revision request that is submitted less than six months before the end of the period of performance. However, very few cases are viewed by USDOL as “exceptional” and, therefore, very few project revisions will be approved under these circumstances.

1. Revision Request Process

To begin the process of requesting a project revision, the recipient should first discuss the need for a revision with the GOR to ensure that the changes necessitate a modification and that they may be acceptable to USDOL. If a revision is necessary, the recipient should submit the request to the GOR for review and the GOR will submit the request to the Grant Officer for approval.

Both programmatic and budget revisions must be done using the Project Revision Form (see [Annex I: Project Revision Form](#)). The form must include a narrative description of the purpose and need for the revision. The justification must include relevant details pertaining to the revision request, such as the status of project objectives, changes to the political or other implementing environment context, description of activities to be implemented and anticipated results given the additional funding or project direction.

The recipient should include supporting documentation to the revision request, as applicable. Examples of supporting documentation may include the resume, salary level, and fringe benefits of proposed key

personnel, a revised work plan, revised logic model, detailed outcomes-based budget, budget narrative, project indicators and revised targets, or other relevant documents.

2. Programmatic Revisions

USDOL prior approval is required for modifications to the project that include changes to strategy, geographical areas, changes in project partners or subrecipients, project deliverables, target participants, indicators at the purpose level, key personnel, or project duration. When a modification to the cooperative agreement is necessary, the recipient must receive a signed modification from the Grant Officer before implementing changes to the project.

3. Budget Revisions

Modifications to the cooperative agreement, with Grant Officer prior approval, are required for changes to the overall budget amount and for shifts between certain budget categories (as specified below).

Budget revisions must be explained in the Revision Form and include the current and proposed revised budget in an outcomes-based format, as included with the project proposal. In addition, revisions must include a brief summary sheet outlining the proposed budget line-item changes (see [Annex I: Project Revision Form](#)).

The following are examples of revisions to the outcomes-based budget that require prior Grant Officer approval through a revision request:

- The inclusion of costs that require prior approval in accordance with 2 CFR Subpart E—Cost Principles or 48 CFR Part 31.
- The transfer of funds budgeted for participant support costs as defined 2 CFR 200.75 to other categories of expense.
- Unless described in the proposal and funded in the approved award, the subawarding or transferring of any work under the federal award. (This does not apply to the acquisition of supplies, material, equipment or general support services.)
- Changes in the amount of approved cost-sharing or matching.
- The transfer of funds among direct cost categories that exceeds or is expected to exceed 10 percent of the total budget.
- The purchase of any equipment with a per unit cost of \$5,000 or more and a useful life of more than one year.
- The transfer of funds to host country governments (approved only on a very limited basis).
- Any revisions that would move funds from cost categories restricted in the FOA and/or in the terms and conditions of award (e.g. Monitoring and Evaluation costs).

See 2 CFR Part 200 (e.g. 200.308, 200.407) and the relevant cost principles for more examples of costs that may require prior approval.

4. Contingency Costs

Recipients must not budget for unforeseen costs or contingency provisions except in unusual circumstances as described in 2 CFR 200.433 Contingency provisions. Instead recipients are encouraged to prepare budgets with reasonable estimated cost projections and to request re-budgeting approval during the life of the project as needed.

5. Participant Support Costs

Recipients may use project funds to cover participant support costs associated with a conference, seminar, symposium, workshop or other event whose primary purpose is the dissemination of technical information and is necessary and reasonable for the successful performance under the Federal award and is in compliance with the recipient's internal operating procedures. Participant support costs means direct costs for items such as daily subsistence allowances and travel allowances paid to or

on behalf of participants or trainees (not including employees of the recipient or subrecipient institution) in connection with the events noted in the preceding sentence. Participant support costs are allowable with the prior approval of USDOL. Costs must be reasonable, taking into account where and when the project activity will take place, and are subject to review by USDOL or its auditors. Where possible, participant support costs should be paid for directly by the recipient or subrecipients to the service provider. If costs are paid directly to participants, recipients should make clear that participant support costs are covering cost incurred and are not compensation for participation at events.

X. Audits, Attestation Engagements, and Project Evaluations

1. Single Audits

As applicable, organization-wide or program-specific audits shall be performed in accordance with 2 CFR 200 Subpart F – Audit Requirements, which codifies the Single Audit Act Amendments of 1996. See [2 CFR 200.101 Applicability](#) for information on which types of entities are subject to these requirements. See also the terms and conditions of award, Administrative Requirements section, for a summary of which types of entities are subject to these requirements (e.g. non-profits, educational institutions) and which types of entities are not (e.g. foreign entities, PIOs).

- Recipients that expend \$750,000 or more in a year in Federal awards shall have a single or program-specific audit conducted for that year in accordance with the requirements contained in 2 CFR Part 200.
- Recipients that expend \$750,000 or more in a year in Federal awards under only one Federal program may elect to have a program-specific audit conducted in accordance with 2 CFR 200.507 Program-specific audits.
- Recipients that expend less than \$750,000 in a year in Federal awards are exempt from Federal audit requirements for that year (except as noted in 2 CFR 200.503 Relation to other audit requirements), but records must be available for review or audit by the Federal agency, pass-through entity and the Government Accountability Office (GAO) upon request.

As applicable, recipients must comply with the timeframes established in those regulations for the submission of their audits to the Federal Audit Clearinghouse. Recipients must notify their assigned GOR of each audit conducted within the timeframe of the DOL-funded project at the time it is submitted to the Federal Audit Clearinghouse. Recipients may be asked by the GOR to submit a copy of a single audit based on the GOR's review of the audit summary in the clearinghouse.

See 2 CFR Part 200, subpart F for more details about audit requirements.

2. Attestation Engagements

USDOL reserves the right to require project-specific attestation engagements to supplement the coverage provided by the annual single audits, which are referenced in the preceding section. All recipients, including non-U.S.-based and private for-profit recipients, are subject to attestation engagements at USDOL's expense during the cooperative agreement period and must cooperate if selected for examination. If USDOL selects a project that was awarded prior to FY17 for an attestation engagement, the project must discuss funding of the engagement with their GOR. For cooperative agreements awarded in FY17, funding of the attestation engagement will occur based on the requirements outlined in the respective FOA and/or cooperative agreement. The following provisions apply.

2.1 Attestation Engagements for non-PIOs

Attestation engagements may be required by DOL to provide additional project oversight of the recipients' validation and monitoring processes. If selected for an attestation engagement, the project may be required

to hire an independent contractor to conduct the work, and will be provided with specific requirements for this activity by DOL. If the project has funds set aside and is not selected for an attestation engagement, DOL will provide guidance on re-programming these funds prior to the end of the project. DOL also reserves the right to directly contract the attestation engagement. In this case, projects may still be responsible for certain support costs, which include, but are not be limited to, providing ground transportation for the attestation engagement contractor, interpretation for the attestation engagement contractor, and in-country transportation and accommodation for staff who may need to accompany the contractor to facilitate meetings and interviews.

The attestation engagements must be conducted in accordance with U.S. Generally Accepted Government Auditing Standards (GAGAS), and include the auditor's opinions on 1) compliance with USDOL regulations and the provisions of the cooperative agreement and 2) the reliability of the recipient's financial and performance reports.

2.2 Audits/Attestation Engagements for PIOs

Project-specific attestation engagements may be required by DOL to provide additional project oversight of the recipients' validation and monitoring processes. If selected for an attestation engagement the project will be provided with specific requirements for this activity by DOL. If a PIO has existing internal requirements or prohibitions that would not allow DOL's external attestation engagements, the PIO may request an exception to the normal attestation engagement process. If an exception was requested, the PIO must provide to USDOL a copy of the internal requirement or regulation prohibiting an attestation engagement. If an exception with supporting documentation is not requested, then the attestation engagement requirements outlined above in section 2.1 will apply. If the project has funds set aside and is not selected for an attestation engagement, DOL will provide guidance on re-programming these funds prior to the end of the project.

In cases where exceptions are granted, attestation engagements for PIOs must be conducted solely in conformity with the examination standards set forth in the International Standards on Auditing and consistent with all terms and provisions established in the Terms of Reference agreed upon by USDOL and the recipient. While these cases do not required adherence to the provisions of the Government Auditing Standards, July 2011 Revision, published by the Comptroller General of the United States, the engagement will have regard to the standards for an examination level engagement in the Chapter on General, Field Work, and Reporting Standards for Attestation Engagements except where incompatible with examination standards that take precedence for the recipient's implementer.

3. Implementation Evaluations

As part of the overall monitoring and evaluation process, USDOL requires projects to undergo external implementation evaluations, usually one at an interim point in the project and a second no later than three months before the project's end, to assess project implementation, progress in meeting goals and objectives, and overall project results. USDOL will determine the exact timing of the evaluations through consultation with the project.

Funds permitting, evaluations will be conducted by an External M&E Expert contracted and managed by USDOL. Any exceptions to this rule will either be outlined in the FOA or cooperative agreement or approved on a case-by-case basis by USDOL. Prior to the start of each evaluation, the External M&E Expert will lead the process of developing the specific terms of reference (TOR) for the evaluation and provide additional guidance on the evaluation scope and process as required, with oversight from OCFT. The recipient will have the opportunity to provide inputs to and comments on the TOR and to review and comment on the draft evaluation report. Circumstances permitting, as standard practice, three months prior to the scheduled interim evaluation, or six months before a final evaluation, the USDOL-contracted external evaluator will begin a consultative process with the recipient and USDOL to develop the TOR. The recipient must provide the USDOL-contracted external evaluator with relevant background materials and with all necessary support in relation to the implementation of the evaluation on

a mutually agreed-upon timeline prior to the start of the evaluation field work. The recipient must also work with the USDOL-contracted external evaluator and any other stakeholders to provide logistical support to facilitate an evaluation.

The USDOL-contracted external evaluator is solely responsible for preparing the evaluation report and for the contents, conclusion and recommendations made in it. The report must be drafted in accordance with the TOR, including with respect to the content, format, and schedule for review and submission. A written draft of the evaluation results/report will be provided to the recipient and USDOL for input before the evaluation is printed in final form.

USDOL intends to cover the costs of implementation evaluations using funding outside of a project's budget. However, because USDOL's funding is never guaranteed from year to year, recipients are required to include funding for evaluations in their budgets in the amounts specified in the respective terms and conditions of award. Typically, such project funding is to be used to support the evaluation process, and may include, but not be limited to, translation of the evaluation report from English into the local language, providing ground transportation for the external evaluator, interpretation for the external evaluator, hosting a full-day evaluation stakeholders meeting, and in-country transportation and accommodation costs for staff and other stakeholders' participation in the stakeholder meeting. Should USDOL not have additional funding (outside of a project's budget) available to cover the costs of implementation evaluations, USDOL will work with the recipient to determine the most appropriate and effective way to make use of existing project funds set aside for evaluations to support the evaluation process. Re-allocation of funds set aside within project budgets for evaluations that are not needed for this purpose must be made in consultation with USDOL and approved by USDOL.

USDOL will consult with the recipient regarding plans and timetables for follow-up actions that are to be taken in response to interim evaluation recommendations. Recipients must report on the progress of these recommendations in each subsequent TPR.

XI. Project Closeout Procedures

1. Financial Settlement of USDOL Funds

The recipient is responsible for the orderly and timely phase out of any projects under the USDOL cooperative agreement and for the financial settlement of claims on behalf of subrecipients and subcontractors.

Funds obligated by USDOL to the recipient remain available for obligation by the recipient during the period of performance of the cooperative agreement.

All valid obligations should be liquidated by the recipient no later than 90 days after the cooperative agreement period of performance ends, unless the recipient receives written approval from the Grant Officer to extend the period for liquidation of outstanding recipient obligations.

For projects funded from two separate fiscal year appropriations and managed as one single project, the recipient must ensure that funds from each fiscal year are obligated during the period of performance, and before their respective funding expiration dates.

Any funds drawn down by the recipient, but not used to liquidate a valid obligation within the time allowed and not reported on, must be returned to USDOL at the earliest date practicable.

Final closeout of the cooperative agreement will not prevent USDOL from disallowing costs or recovering funds from the recipient on the basis of a later audit or review, in accordance with the provisions of 2 CFR 200.344.

2. Government Property Inventory Disposition Request

No later than 120 days before completion of the project, the recipient must submit the following information to the Grant Officer, consistent with the regulations applicable to “Property Standards” at 2 CFR 200.310-316:

- a Government Property Inventory Disposition Request for all real property, equipment, and intangible property (see [Annex IV: Inventory List Template \(Sample\)](#));
- an inventory list of supplies, if unused supplies exceed USD 5,000 in total aggregate value at the time of closeout.

The Grant Officer will provide instructions regarding the final disposition of property.

3. Project Closeout Documents

Approximately 120 days before completion of the project, USDOL will provide the recipient closeout instructions.

Within 90 days of completion of the project, unless otherwise specified below, the recipient must provide the Grant Officer and GOR with the following project closeout reports:

- Recipient Submittal of Closeout Documents Checklist
- Final Technical Report. See [Final Technical Report](#);
- A Final Federal Financial Report SF-425. See Additional Financial Reporting. This report is not a certified financial statement, but provides USDOL with an overview of allocations and expenditures as well as project balances by budget line;
- A final FFR/SF-425 quarterly report through the e-grants system. See [Final Federal Financial Report SF-425](#);
- Closeout Financial Form through the e-grants system;
- Recipient’s Release Form;
- Recipient’s Assignment of Refunds, Rebates, and Credits Form; and
- Government Property Closeout Inventory Certification.

If more than 90 days is needed the recipient must submit a request to the project GOR.

All attestation engagement findings must be closed before a project’s Cooperative Agreement can be closed out. USDOL and the recipient are each to maintain copies of all closeout documents for three years after the Cooperative Agreement expires. See [2 CFR 200.33 Retention requirements for records](#).

XII. Restrictions, Unallowable Activities, and Specific Prohibitions

USDOL/ILAB would like to highlight the following restrictions, unallowable activities, and specific prohibitions, as identified in 2 CFR Part 200, Subpart E – Cost Principles, and USDOL policy for all USDOL-funded child labor and/or forced labor elimination projects. If the recipient has questions regarding these or other restrictions, consultation with OCFT is recommended.

1. Pre-Award Costs

USDOL funds may not be encumbered or obligated by a recipient before the period of performance. Pre-award costs, including costs associated with the preparation of an application submitted in response to an FOA, are not reimbursable under the cooperative agreement.

2. Subawards and contracts

Subawards and contracts awarded after receipt of the notice of award, and not approved as part of the original award, must be awarded according to 2 CFR Part 200. Contracts must be awarded in accordance with 2 CFR 200.317-326. Subawards must be awarded in accordance with 2 CFR 200.330-332 and require prior approval by USDOL in accordance with 2 CFR 200.308(c)6 if not approved as part of the original award. In the rare event that funds are provided to host country governments, prior approval by USDOL is required. Subawards and contracts are subject to audit, in accordance with the requirements of 2 CFR 200, Subpart F – Audit Requirements.

The debarment and suspension rule, as outlined in 29 CFR Part 98, applies to all subawards issued under the cooperative agreement except for allowable exclusions (e.g. direct awards to PIOs). The recipient is responsible for ensuring that all subrecipients and subcontractors are eligible for participation in Federal assistance programs. The recipient may check the following website to assess available information on parties that are excluded from receiving Federal financial and nonfinancial assistance and benefits, pursuant to the provisions of 31 U.S.C. 6101, note, E.O. 12549, E.O. 12689, 48 CFR 9.404: <http://www.sam.gov/>.

If the recipient plans to provide funding to subawards that are not listed in the cooperative agreement, then they must provide the proposed subaward recipient name, a description of project activity, and a subaward budget and budget narrative (See Annex III). The recipient must also explain how the proposed subrecipient was identified and selected for funding. Recipients are responsible for subrecipients' expenditure of funds, financial management, and compliance with USDOL and Federal regulations. This includes ensuring subrecipient compliance with all audit requirements established in 2 CFR Part 200, Subpart F – Audit Requirements.

3. Funds to Host Country Governments

It is recognized that the normal requirements for competition as described in 2 CFR 200.317-326 apply to procurements of goods and services, including those for which foreign governments may compete. The normal requirements for subawards as described in 2 CFR 200.330-332 apply to passing through part of the Federal award to another entity, including to a foreign government. However, USDOL funds are not intended to duplicate existing foreign government efforts or substitute for activities that are the responsibility of such governments.

Accordingly and generally, recipients may not provide any of the funds obligated under a cooperative agreement to a foreign government or entities that are agencies of, or operated by or for, a foreign state or government, ministries, officials, or political parties, except in cases consistent with the paragraph below.

Exceptions may be made in cases where the following conditions are satisfied: (1) the recipient funding of such activities would not duplicate existing foreign government efforts or substitute for activities that are the responsibility of such governments, (2) the recipient has demonstrated that funding of activities through a government entity is necessary for achieving the goals of the project, including building government capacity, and (3) the recipient has received prior USDOL approval. In granting such approval, consideration will be given, in the case of a contract, where the recipient has conducted a competitive procurement process and has determined that no other entity is able to provide services or undertake project activities, and, in the case of a subaward, where the recipient has undertaken an assessment that demonstrates (1) the need for allocating funding to a specific government entity to carry out a given activity and (2) why the funding of any other entity to carry out the activity in question would result in the recipient's inability to achieve a key goal of the project.

This information must be included in all subaward and/or contract agreements issued under the Cooperative Agreement.

The recipient must submit all relevant information to USDOL for approval, [see Annex III](#). (Information

on Funding to Host Country Governments and/or to Subawards) and section IV.2.2.

4. Direct Cash Transfers to Communities, Parents, or Children

USDOL does not allow for direct cash transfers to target participants, including communities, parents, or children. Purchase of incidental items is allowable if necessary for direct participants' involvement in project activities and as a means of promoting sustainable reduction of child labor and/or forced labor in the target group, and must be approved by USDOL. Such participant costs could include direct costs such as uniforms, tool kits for livelihood interventions, school supplies, books, provision of tuition or transportation. Recipients may propose microfinance interventions (e.g., micro-savings and micro-loans) or linkages to existing microfinance programs.

If approved by USDOL, these items shall be purchased or paid for directly by the recipient or subrecipients or subcontractors in the form of vouchers, or payment to the service provider, as opposed to transferring cash directly to project participants or other individuals. This ensures that the money goes for its intended purpose and is not diverted or lost.

If the recipient proposes the provision of additional participant costs other than those that were outlined and approved in its original application, the recipient must first contact the GOR for approval, and specify: a) why these activities and interventions are necessary, and how they will contribute to the overall project goals; and b) how the disbursement of funds will be administered in order to maximize efficiency and minimize the risk of misuse. The recipient must also address how participant costs will be made sustainable once the project is completed.

5. Microfinance and Alternative Income-Generating Activities

USDOL funds awarded under any USDOL-OCFT cooperative agreements may be used to provide micro-credits, revolving funds, or loan guarantees, as proposed by the recipient and approved by USDOL. USDOL reserves the right to negotiate the exact nature, form, or scope of alternative income-generating activities and to approve these activities when proposed by the recipient. Other permissible costs related to alternative income-generating activities for parents and children may include, but are not limited to vocational or skills training, incidental tools, guides, manuals, and market feasibility studies.

Whether the recipient provides microfinance services directly or refers project participants to such services, the recipient must take steps to safeguard project participants (individuals or households) and ensure partnership with only responsible and appropriate microfinance institutions, including the following:

- Ensure that microfinance services intended to support increased household livelihood do not result in the unintended consequence of increasing demand for child labor;
- Carry out an assessment of a given project participant's loan readiness, current financial status (current income and debts), and business plan prior to providing or facilitating access to microcredit/microloan opportunities to reduce the likelihood of project participants becoming over-indebted;
- Provide project beneficiaries with relevant technical assistance as needed, including basic literacy and numeracy, financial skills/literacy, and business management training, prior to providing or facilitating access to microfinance, which may include the provision of microcredit/microloan, microsavings, or microinsurance opportunities;
- Provide ongoing monitoring of project participants (including financial status of household and educational and labor status of children in the household) and ensure the continued provision of relevant technical assistance as needed over the life of the microfinance service for project participants who have been provided with microfinance or referred to organizations providing such opportunities;
- Ensure microfinance partner institutions are able to reach groups targeted by the project and demonstrate a willingness to be appropriately flexible to best support a mission of poverty alleviation;

- Encourage microfinance partner institutions to make information on lending practices publically available, such as by reporting on the Microfinance Information Exchange;
- Encourage microfinance partner institutions to make reasonable efforts to implement client protection principles, such as those outlined in the SmartCampaign.

6. Indirect Costs

Applicants may support indirect costs according to Federal regulations. Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective. Indirect cost charges must be based on allowable (i.e. necessary, reasonable, conforming, consistent and documented) costs based on the applicable cost principles.

- For organizations with a negotiated indirect cost rate agreement (NICRA) approved by the Federally Cognizant Agency (FCA)⁵ or other rate agreement approved by DOL: Indirect costs must be supported according to the approved rate agreement. When a new rate agreement is in place, submit it to your GOR as soon as possible.
- For organizations with no budgeted/claimed indirect costs: All supported costs must be certified to be directly allocable to the project and not supported from any other source.
- For organizations that have never received a negotiated indirect cost rate, with exceptions noted in 2 CFR 200.414(f), and received approval to use a de minimis indirect cost rate of 10 percent of modified total direct costs (MTDC): Indirect costs must be supported consistently and in compliance with relevant cost principles. The de minimis rate must be used consistently for all Federal awards and may be used indefinitely or until the organization negotiates a rate with the Federally Cognizant Agency.

7. Personnel Housing and Personal Living Expenses

In accordance with federal cost principles, recipient or subrecipient personnel housing and personal living expenses may not be counted as fringe benefits or indirect costs in the project budget. USDOL funds may only be used to pay for housing costs, housing allowances, and personal living expenses (e.g., dependents' allowance) of project staff if they (1) are separately accounted for as direct costs of the project necessary for the performance of the project and (2) receive prior approval from USDOL.

Recipients must provide a brief explanation as to why such costs are considered necessary for the performance of the project, consistent with the organization's established policies, and reasonable given costs in the country where the staff person will reside.

8. Construction

Construction with funds under the Cooperative Agreement is subject to USDOL approval and ordinarily should not exceed 10 percent of the project budget's direct costs. Funds for construction must be clearly specified in the budget. Any activities that lead to the creation of real property (e.g., a new classroom, an addition to an existing building, wells, or latrines) that is of a permanent nature must be classified under construction expenses. In addition, expenses in support of construction cannot be classified as supplies, and should be regarded as construction activities.

⁵ A federal cognizant agency (FCA) is the agency responsible for negotiating an organization's indirect cost rate and for issuing the appropriate NICRA. Unless specifically assigned by OMB, the Federal agency from which an organization receives the preponderance of direct funding is normally the FCA. If USDOL is your FCA, you can work with OCD to modify your existing NICRA. More information about USDOL's Office of Cost Determination (OCD) is available at <http://www.dol.gov/oasam/boc/dcd/>. This website has guidelines to develop indirect cost rates, links to the applicable cost principles, contact information and other FCA websites. The OCD also has Frequently Asked Questions providing general information about the indirect cost rate approval process and due dates for provisional and final indirect cost rate proposals at <http://www.dol.gov/oasam/faqs/FAQ-dcd.htm>.

In general, USDOL expects construction to be limited to improving existing infrastructure and facilities of schools and/or other learning environments attended by direct participants. In order to promote sustainability, USDOL encourages recipients to secure matching funds, in-kind contributions, or other forms of cost sharing from the government, communities, and local organizations when proposing construction activities. All modifications to the project's budget to address construction related changes must receive prior approval from USDOL. Modifications under the 10 percent budget revision threshold require an informal request to and approval by the GOR. Modifications above the 10 percent threshold require a formal [project revision](#) request to be approved by the Grant Officer.

9. Value Added Tax (VAT)

VAT foreign taxes charged for the purchase of goods or services that a recipient is legally required to pay in country is an allowable expense under Federal awards. After notifying DOL, the recipients and subrecipients shall make every effort to apply for and receive VAT exemption in the country or countries in which the project operates. 2 CFR 200.470

The recipient will report on the progress of its application for VAT exemption in its Technical Progress Reports.

See Communication with U.S. Embassies section of this MPG for more information.

10. Miscellaneous Prohibitions

USDOL funds may not be used to provide for:

- The purchase of land;
- The procurement of goods or services for personal use by the recipient's employees;
- Entertainment, including amusement, diversion, and social activities and any costs directly associated with entertainment (such as tickets, meals, lodging, rentals, transportation, and gratuities). Costs of training or meetings and conferences, when the primary purpose is the dissemination of technical information, might be allowable. This might include reasonable costs of meals and refreshments, transportation, rental of facilities and other items incidental to such meetings and conferences. Costs related to child labor educational activities, such as street plays and theater, may be allowable; and
- Alcoholic beverages.

11. Inherently Religious Activities

The U.S. Government is generally prohibited from providing direct financial assistance for inherently religious activities. The recipient and subrecipients may work with and make subawards to religious institutions; however, Federal funds provided under a USDOL-awarded cooperative agreement may not be used for religious instruction, worship, prayer, proselytizing, other inherently religious activities, or the purchase of religious materials. Neutral, non-religious criteria that neither favor nor disfavor religion will be employed in the selection of recipients and must be employed by the recipient in the selection of subrecipients and subcontractors. This provision must be included in all subawards issued under the cooperative agreement.

Any inherently religious activities conducted by the recipient must be clearly separated in time or physical space from activities funded by USDOL. Recipients must segregate from Federal and matching funds (neither of which can be used to fund inherently religious activities), and account for separately, any non-federal and non-matching funds (or allocable portion of those funds) used for inherently religious activities.

Additionally, direct participants of the project must have a clear understanding that their enrollment in a USDOL-funded project is not conditioned on their participation in any religious activities. Direct

participants must have a clear understanding that a decision to not participate in any inherently religious activity will in no way impact, or result in any negative consequences to their standing, participation in or receipt of benefits from a USDOL-funded project.

If the recipient is unclear whether a given project activity may involve an inherently religious activity, the recipient should consult with the GOR prior to implementing the activity.

This provision must be included in all subawards issued with USDOL funds.

12. Program Income

Program income, as defined by 2 CFR 200.80, generated from recipient activities, must be added to the award and must be expended for allowable activities and as described in 2 CFR 200.307 Program income.

13. Lobbying and Fundraising

Funds provided by USDOL for project expenditures under the cooperative agreement may not be used with the intent to influence a member of the U.S. Congress, a member of any U.S. Congressional staff, or any official of any Federal, State, or Local Government in the United States (hereinafter “government official(s)”), to favor, adopt, or oppose, by vote or otherwise, any U.S. legislation, law, ratification, policy, or appropriation, or to influence in any way the outcome of a political election in the United States, or to contribute to any political party or campaign in the United States, or for activities carried on for the purpose of supporting or knowingly preparing for such efforts. This includes awareness raising and advocacy activities that include fund-raising or lobbying of U.S. Federal, State, or Local Governments (see 2 CFR 200.442 and 450). This does not include communications for the purpose of providing information about the recipient or its subrecipients and their programs or activities in response to a request by any government official or for consideration or action on the merits of a federally- sponsored agreement or relevant regulatory matter by a government official.

A cooperative agreement recipient classified under revenue code as a 501(c)(4) entity (see 26 U.S.C. 501(c)(4)), may not engage in lobbying activities. According to the Lobbying Disclosure Act of 1995, as codified at 2 U.S.C. 1611, an organization, as described in Section 501(c)(4) of the Internal Revenue Code of 1986, that engages in lobbying activities directed toward the U.S. Government is not eligible for the receipt of federal funds constituting an award, grant, cooperative agreement, or loan.

This provision must be included in all subawards issued under the Cooperative Agreement.

14. Fly America Act

Recipients and their subrecipients must adhere to the International Air Transportation Fair Competitive Practices Act of 1974 (49 U.S.C. 40118) (Fly America Act).⁶

⁶ For full text of the International Air Transportation Fair Competitive Practices Act of 1974 (49 U.S.C. 40118), see <http://www.gpo.gov/fdsys/granule/USCODE-2011-title49/USCODE-2011-title49-subtitleVII-partA-subparti-chap401-sec40118/content-detail.html>.

15. Trafficking in Persons, Commercial Sex Acts, and Forced Labor⁷

Unless otherwise agreed in the cooperative agreement, the provisions in this section are applicable as noted below:

A. The following provisions are applicable to the recipient, if it is a private entity:

1. The recipient, its employees, subrecipients and subrecipients' employees may not a) engage in severe forms of trafficking in persons during the period of time that the award is in effect, b) procure a commercial sex act during the period of time that the award is in effect; or c) use forced labor in the performance of the award or subaward under the award.
2. USDOL may unilaterally terminate this award, without penalty, if the recipient or a subrecipient that is a private entity a) is determined to have violated a prohibition in paragraph A.1 of this section; or b) has an employee who is determined by the agency official authorized to terminate the award to have violated a prohibition in paragraph A.1 of this section through conduct that is either associated with performance under this award; or imputed to the recipient or the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR Part 180, "Governmentwide Debarment and Suspension (Nonprocurement)."

B. The following provision is applicable to the recipient if it is other than a private entity:

1. USDOL may unilaterally terminate the cooperative agreement, without penalty, if a subrecipient a) is determined to have violated a prohibition in paragraph A.1 of this section; or b) has an employee who is determined by the agency official authorized to terminate the award to have violated an applicable prohibition in paragraph A.1 of this section through conduct that is either associated with performance under this award; or imputed to the recipient or the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR part 180, "Governmentwide Debarment and Suspension (Nonprocurement)."

C. The following provisions are applicable to the recipient regardless of whether it is or is not a private entity:

1. The recipient must inform USDOL immediately of any information the recipient receives from any source alleging a violation of a prohibition in paragraph A.1 of this section.
2. USDOL's right to terminate unilaterally that is described in paragraph A.2 or B.1 of this

⁷ For purposes of this section:

"Employee" means either a) an individual employed by you or a subrecipient who is engaged in the performance of the project or program under this award; or b) another person engaged in the performance of the project or program under this award and not compensated by you including, but not limited to, a volunteer or individual whose services are contributed by a third party as an in-kind contribution toward cost sharing or matching requirements.

"Forced labor" means labor obtained by any of the following methods: the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

"Private entity" a) means any entity other than a State, local government, Indian tribe, or foreign public entity, as those terms are defined in 2 CFR 175.25 and b) includes a) a nonprofit organization, including any nonprofit institution of higher education, hospital, or tribal organization other than one included in the definition of Indian tribe at 2 CFR 175.25 (b) a for-profit organization.

"Severe forms of trafficking in persons," "commercial sex act," and "coercion" have the meanings given at section 103 of the TVPA, as amended (22 USC 7102).

section i) implements section 106(g) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7104(g)), and ii) is in addition to all other remedies for noncompliance that are available to USDOL under this cooperative agreement.

3. The recipient must include the requirements of paragraph A.1 of this section in any subaward it makes to a private entity using USDOL funds.

16. Prostitution

Unless otherwise agreed in the cooperative agreement, the provisions in this section are applicable as noted below.

The U.S. Government is opposed to prostitution and related activities which are inherently harmful and dehumanizing and contribute to trafficking in persons. U.S. NGOs, corporations, and their subrecipients cannot use funds provided by USDOL to lobby for, promote, or advocate the legalization or regulation of prostitution as a legitimate form of work. Foreign-based NGOs, corporations, and their subrecipients that receive USDOL funds cannot lobby for, promote, or advocate the legalization or regulation of prostitution as a legitimate form of work while acting as a funded entity on a USDOL-funded project. It is the responsibility of the recipient to ensure that all subrecipients meet these criteria. This provision must be included in all subaward agreements that are awarded using USDOL funds, and the recipient must obtain a written declaration to such an effect from the subrecipients concerned.

17. Terrorism

Unless otherwise agreed in the cooperative agreement, the provisions in this section are applicable as noted below.

The recipient is reminded that U.S. law, including Executive Orders, prohibits transactions with, and the provision of resources and support to, individuals and organizations associated with terrorism. It is the legal responsibility of the Recipient to ensure compliance with these Executive Orders and laws. It is the policy of USDOL to seek to ensure that none of its funds are used, directly or indirectly, to provide support to individuals or entities associated with terrorism. The recipient must check the applicable Web site to assess available information on parties that are excluded from receiving federal financial and nonfinancial assistance and benefits. See <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>.

This provision must be included in all subawards issued under the Cooperative Agreement.

XIII. Suspension and Termination Procedures

If the recipient fails to comply with the terms, conditions or standards of a cooperative agreement, and usually after exhausting reasonable remedies for non-compliance, USDOL may, on reasonable notice to the recipient, suspend the cooperative agreement or a specific project or projects under the cooperative agreement, and withhold further payments, or prohibit the recipient from incurring additional obligations of cooperative agreement funds, pending corrective action by the recipient or a decision to terminate in accordance with section 1 or section 2 described below. The USDOL Grant Officer will allow all necessary and proper costs that the recipient could not reasonably avoid during the period of suspension provided that they meet the requirements outlined in the cooperative agreement.

A cooperative agreement may be terminated in accordance with 2 CFR 200.338-342 and the guidelines below.

1. Termination by the Grant Officer

The Grant Officer may terminate a grant in whole, or in part, or a specific project or projects under a

cooperative agreement, at any time before the date of completion, whenever it is determined that the recipient has failed to comply with the terms and conditions of the award (including project revisions requiring such approval), whether stated in a federal statute or regulation, an assurance, an application, a notice of award, or elsewhere. The Grant Officer is expected to promptly notify the recipient in writing of the determination, the reasons for the termination, and the effective date of termination. Payments made to the recipient or recoveries by USDOL must be in accord with the legal rights and liabilities of the parties.

2. Termination by the Grant Officer with Consent of the Recipient

The Grant Officer, with the consent of the recipient, may terminate a grant in whole, or in part, or a specific project or projects under a Cooperative Agreement, at any time before the date of completion. In this case, the two parties shall agree upon the termination conditions, including the effective date, and in the case of partial termination, the portion to be terminated. The recipient must not incur new obligations for the terminated portion after the effective date and must cancel as many outstanding obligations as possible. The Grant Officer is expected to allow full credit to the recipient for the federal share of the obligations that cannot be cancelled properly but are incurred by the recipient prior to termination. Payments made to the recipient or recoveries by USDOL must be in accord with the legal rights and liabilities of the parties.

3. Termination by the Recipient

The recipient may terminate the agreement upon sending written notification to USDOL, setting forth the reasons for such termination, the effective date, and in the case of partial termination, the portion to be terminated. However, in the case of a partial termination, if USDOL determines that the remaining portion of the award would not accomplish the purposes for which the award was made; USDOL may terminate the award in its entirety.

Definitions

Suspension: Depending on the award, suspension means either, 1) an action by the Grant Officer that temporarily suspends federal assistance under the cooperative agreement, pending corrective action by the recipient or pending a decision to terminate the cooperative agreement by the Grant Officer; or 2) an action taken by a suspension official implementing Executive Order 12549 to immediately exclude a person from participating in cooperative agreement transactions for a period, pending completion of an investigation and such legal or debarment proceedings as may ensue.

Termination: Termination means the permanent withdrawal of the authority to obligate previously awarded cooperative agreement funds before that authority would otherwise expire. It also means the voluntary relinquishment of that authority by the recipient or its subrecipient.

Annex I: Project Revision Form

Template recommended for use.

PROJECT REVISION FORM

Project Title:

Recipient:

Cooperative Agreement Number:

USDOL Appropriation Number:

Submission and Resubmission Dates: *(Include both, as applicable)*

See MPG Section IX. [Project Revisions](#) for more detailed information regarding the submission requirements for revision requests.

BRIEF SUMMARY OF REVISION ITEMS

Please insert brief bullets or a sentence or two summarizing the critical revision items included in this request (e.g. request for budget reallocation to do XYZ; request for change in key personnel; request to extend the period of performance from XX to XX; etc.).

BACKGROUND AND JUSTIFICATION FOR PROJECT REVISION

Please provide a concise description of the purpose for the revision, followed by a detailed narrative justifying the request.

EFFECTS OF REVISION ON THE PROJECT

In the table below, include all changes to the project associated with the proposed request. Describe the current status for each category in the middle column and the proposed changes in the right-hand column. If no changes are anticipated in a category, type "no change."

Project Elements	Current Project Status	Changes anticipated through this revision request
Geographical areas		
Target group – number and/or characteristics of direct project participants (participants)		

Program strategies leading to significant change in project objective, outcomes and/or outputs		
Key personnel		
Budget		
Project duration/ end date		
Subaward entities, activities and/or budgets		
Other (please specify)		

SUPPORTING DOCUMENTS

Include additional documents to justify this revision request, such as SF-424 and SF-424A, resume, salary level, and fringe benefits of proposed key personnel, current status of results against project indicators, or updated work plan. In addition, budget revision requests must include a revised detailed outcomes-based budget showing current and proposed line item allocations, and the Budget Revision Summary Sheet (see below). Include a budget narrative, as applicable.

BUDGET REVISION SUMMARY SHEET

Project Title:
Recipient:
Cooperative Agreement Number:
USDOL Appropriation Number:

COMPARISON OF BUDGETS

Include a table below which includes the current budget allocation, proposed budget allocation, and the difference between the two, for major budget categories or line items which will be changed by the proposed revision. See sample below.

Sample Budget Summary Table

Budget Lines	Current Approved Allocation Level	Proposed New Allocation Level	Difference
Personnel	\$180,000	\$180,000	0
Travel, incl. per diem	\$50,000	\$50,000	
Contracts			
Technical Consultant for Panama	\$25,000	\$15,000	-\$10,000
Technical Consultant for Peru	\$25,000	\$15,000	-\$10,000
Subawards			
Children Now	\$100,000	\$20,000	-\$80,000
Citizens Helping Children	\$50,000	\$130,000	\$80,000
Supplies and Office Expenses	\$65,000	\$65,000	
Equipment	\$80,000	\$50,000	-\$30,000
M&E	\$35,000	\$25,000	-\$10,000
Outcome 1	\$500,000	\$560,000	\$60,000
Printing	\$30,000	\$30,000	0
Other Direct Costs	\$50,000	\$50,000	0
Total Direct Costs	\$1,190,000	\$1,190,000	
Indirect Costs (NICRA)	\$21,000	\$21,000	
Total	\$1,211,000	\$1,211,000	0

EXPLANATION OF CHANGES

Include a narrative of proposed budget line changes. See sample below.

Salary and Fringe: No change

Contracts: The project had planned to hire two consultants to carry out rapid assessment research of child labor in the urban informal sector in Panama and Peru. The project had cost savings through these activities as the studies required less time than anticipated so consultant costs were lower (funds reallocated to Activities in this request).

Subawards: The project has terminated a subaward with Children Now. Children Now was scheduled to provide after school educational assistance to children withdrawn and prevented from the worst forms of child labor. However, the subrecipient decided to suspend operations in the province and leave the project. As a replacement, the organization Citizens Helping Children has been selected through a competitive process to carry on these activities (for more detailed information please see project revision justification).

Travel, including Per Diem: The project experienced cost savings within travel and per diem funds due to creating additional cost-efficiencies by combining travel with other activities and experiencing unanticipated reductions of in-country travel costs (funds reallocated to Activities in this request).

M&E: The project had budgeted for external evaluations, however these costs were primarily covered by USDOL. The project paid the costs of the stakeholders meeting and project staffs participating while costs related to the external consultant, travel to project sites, etc. were paid by USDOL (funds reallocated to Activities in this request).

Outcome 1: The cost savings in the categories listed above will be allocated to the Outcome 1, output 1.2.3 budget line to allow the project to serve an additional 200 children in the project's non-formal educational programs (for more detailed information please see project revision justification). These services are carried out directly by the project.

Printing: No change

Other Direct Costs: No change

Indirect Cost (NICRA): No change

Annex II: Federal Financial Report (sample)

<https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html>

Recipients must submit the quarterly Federal Financial Report (FFR) Standard Form SF-425 electronically through the eGrants system. The image below is for informational purposes only.

U.S. Department of Labor, Bureau of International Labor Affairs
Office of Child Labor, Forced Labor, and Human Trafficking

FEDERAL FINANCIAL REPORT

(Follow form instructions)

1. Federal Agency and Organizational Element to Which Report is Submitted		2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment)		Page	of		
				1			
pages							
3. Recipient Organization (Name and complete address including Zip code)							
4a. DUNS Number	4b. EIN	5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment)	6. Report Type <input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annual <input type="checkbox"/> Annual <input type="checkbox"/> Final	7. Basis of Accounting <input type="checkbox"/> Cash <input type="checkbox"/> Accrual			
8. Project/Grant Period From: (Month, Day, Year) To: (Month, Day, Year)			9. Reporting Period End Date (Month, Day, Year)				
10. Transactions					Cumulative		
<i>(Use lines a-c for single or multiple grant reporting)</i>							
Federal Cash (To report multiple grants, also use FFR Attachment):							
a. Cash Receipts							
b. Cash Disbursements							
c. Cash on Hand (line a minus b)							
<i>(Use lines d-o for single grant reporting)</i>							
Federal Expenditures and Unobligated Balance:							
d. Total Federal funds authorized							
e. Federal share of expenditures							
f. Federal share of unliquidated obligations							
g. Total Federal share (sum of lines e and f)							
h. Unobligated balance of Federal funds (line d minus g)							
Recipient Share:							
i. Total recipient share required							
j. Recipient share of expenditures							
k. Remaining recipient share to be provided (line i minus j)							
Program Income:							
l. Total Federal program income earned							
m. Program income expended in accordance with the deduction alternative							
n. Program income expended in accordance with the addition alternative							
o. Unexpended program income (line l minus line m or line n)							
11. Indirect Expense		a. Type	b. Rate	c. Period From	d. Base	e. Amount Charged	f. Federal Share
		g. Totals:					
12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:							
13. Certification: By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and intent set forth in the award documents. I am aware that any false, fictitious, or fraudulent information may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)							
a. Typed or Printed Name and Title of Authorized Certifying Official				c. Telephone (Area code, number and extension)			
				d. Email address			
b. Signature of Authorized Certifying Official				e. Date Report Submitted (Month, Day, Year)			
				14. Agency use only:			

Standard Form 425 - Revised 6/28/2010
OMB Approval Number: 0348-0061
Expiration Date: 10/31/2011

Paperwork Burden Statement
According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is 0348-0061. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0061), Washington, DC 20503.

Annex III: Information on Proposed Funding to Host Country Governments and/or to Subawards

Template recommended for use.

Recipients must submit this table to the GOR within four months of award for approval, if applicable. Recipients must also submit this table, at any point during the project implementation period, prior to any subaward and/or prior to providing funds to a Government Agency. **See Section IV.2.2 for more information on applicability.** The status of approved subawards and/or funding to a Government Agency must be reported on in the semi-annual TPRs.

Proposed Funding to Host Country Governments and/or Subawards					
Name of Project:					
Project number: IL-XXXXX					
Organization or Government Agency	Outcome	Output	Activities	Budget in USD	Assessment & Justification

Annex IV: Equipment and Real Property Inventory List Template (sample)

Recipients must maintain equipment and property records for all items purchased with federal funds (including items purchased by subrecipients), updated and submitted to the Grant Officer at least every two years, and must submit this table to the GOR at least 120 days prior to the end of the Cooperative Agreement period for project closeout.

This template is available as a Microsoft Excel file from USDOL. The image below is for informational purposes only.

INVENTORY/DISPOSITION RECORD							COOPERATIVE AGREEMENT No.									
DESCRIPTION OF PROPERTY	SERIAL NUMBER OR OTHER IDENTIFICATION	SOURCE OF PROPERTY	TITLE HELD BY RECIPIENT OR U.S. GOVERNMENT	ACQUISITION DATE	% OF FEDERAL PARTICIPATION IN COST OF PROPERTY	ACQUISITION COST OF PROPERTY	USEFUL LIFE OF PROPERTY	DEPRECIATION METHOD	FAIR MARKET VALUE (FMV)	LOCATION OF PROPERTY	PROPERTY USE	CONDITION OF PROPERTY	LAST DATE OF PHYSICAL INVENTORY	METHOD OF DISPOSITION	DATE OF DISPOSITION	SALES PRICE