Technical Assistance Guide for PY 2024 Incremental Funding Requests

Grant Officer's Memorandum 01-24 Attachment 1



UNITED STATES DEPARTMENT OF LABOR

Veterans' Employment and Training Service Office of National Programs

CONTENTS

Techn	ical Assistance Guide for PY 2024 Incremental Funding Requests	. 1
I.	Eligibility for Incremental Funding	2
	Incremental Funding Amendment Application Requirements	
	Instructions for Completing Required Incremental Funding Amendment Application Documents AND FORMS	
	Budget Narrative Guidance	
V.	Considerations	7
VI.	Technical Assistance	8

I. ELIGIBILITY FOR INCREMENTAL FUNDING

- Homeless Veterans' Reintegration Program (HVRP) grant recipients in their first or second year of their period of performance (PoP) are eligible for incremental funding. To receive the second and third year of incremental funding, the grant recipient must submit an incremental funding request via an Incremental Funding amendment application to their respective Grant Officer's Technical Representative (GOTR) in GrantSolutions (GS).
- To receive program year (PY) 2024 funding, a grant recipient must have an active System for Award Management (SAM) registration. An expired registration will delay receipt of incremental funding.

II. INCREMENTAL FUNDING AMENDMENT APPLICATION REQUIREMENTS

Grant recipients must submit Incremental Funding amendment applications to their GOTR by **February 20, 2024.** The amendment applications must include the following:

- Transmittal Memorandum (TM) Must be uploaded into GS. See section III below for the required content of the TM.
- SF 424 Application for Federal Assistance This form must be completed online in GS. See section III below for instructions.
- SF-424A Budget Information Non-Construction This form must be completed online in GS. See section III below for instructions.
- **Budget Narrative** Must be uploaded into GS and provide a description of costs associated with each line item on the SF-424A. The Budget Narrative total must equal the totals on the SF-424 and SF-424A. The Budget Narrative must reflect all costs for the next 12-month program year. The Budget Narrative should also include a section describing any leveraged resources provided (as applicable) to support grant activities. The Veterans' Employment and Training Service (VETS) considers any resources contributed to the project, beyond the funds provided by the agency, as leveraged resources.
- **Project Narrative (if applicable)** Must be uploaded into GS and is only required if the grant recipient requests changes to the project or scope of work.
- HVRP Award Amendments Change Request Form Must be uploaded into GS and is only required if the grant recipient requests revisions to their quarterly or cumulative goals or Service Delivery Area (SDA). Changes to the SDA and/or planned cumulative goals are changes to the statement of work and require sufficient justification, as well as approval by the Grant Officer, in accordance with the latest VETS policy on HVRP amendments. Grant recipients requesting to change their SDA and/or change/realign their goals must submit the HVRP Award Amendments Change Request Form, available on the VETS website under Program Documents.

III. INSTRUCTIONS FOR COMPLETING REQUIRED INCREMENTAL FUNDING AMENDMENT APPLICATION DOCUMENTS AND FORMS

- **Transmittal Memorandum (TM):** The TM must be addressed to the Grant Officer through the GOTR and must include the following:
 - A statement from the Authorized Representative signing the memorandum that indicates

their authority to enter into an agreement with the Department of Labor (DOL)/VETS.

- o The amount of funding requested.
- A statement that establishes the grant recipient's Percentage of Enrollments Trained cumulative goal. The percentage must be between 55 percent and 100 percent rounded to the nearest whole number, without decimals.
- o Description of any changes to the grant agreement requiring Grant Officer approval (see or the latest policy on HVRP amendments) that affects PY 2024, such as:
 - Changes to the SDA
 - Revisions or changes to goals (quarterly or cumulative)
 - A change in Authorized Representative

NOTE: If the amendment application involves a request for equipment, include a list of the item(s) to be purchased, quantity, and the per unit costs.

- o Any other information relevant to the program/request.
- SF-424 Application for Federal Assistance (Note: Not all required fields are listed below. Also, some fields are automatically populated.): You must indicate the total amount of projected funding needed to continue operations for the next 12-month PY within the PoP. Note: The amount entered on the SF-424 must not exceed the amount referenced in the VETS-704 Abstract submitted under the applicable funding opportunity announcement but may be less than the amount referenced in the VETS-704 Abstract of the initial grant application, should unobligated balances of prior PY funding increments offset their budget for PY 2024.
 - Block 1 Mark "**Application**."
 - o Block 2 Select the appropriate letter in the drop-down menu. An Incremental Funding request is "A: Increase Award."
 - o Block 8 Applicant Information.
 - o Block 14 Areas to be served. Reference your HVRP SDA. Enter information contained in your Abstract under Service Delivery Area.
 - This is **NOT** the same as Congressional Program/Project 16b.
 - Include an attachment of affected areas.
 - o Block 16 Congressional District
 - (16a) Applicant This is the congressional district of the organization named in Block 8 of the form.
 - (16b) Program/Project This is the congressional district for the service area noted in Block 14 of the form. Grant recipients must enter the congressional district of their **home office**. The home office is the main location where the program is administered. The home office is typically where the HVRP program manager, or equivalent, is assigned. This may be different from the address (corporate office location) used to identify the organization in Block 8 of the SF-424. If your home office is the same as the address listed in Block 8, repeat that information here and state that the home and corporate office locations are the same.
 - Information in Block 16 must remain consistent with the original awarded application

unless the grant recipient is requesting a change within the amendment application.

- o Block 17b − **Do not change the automatically populated PoP end date.**
- Block 18a-g Estimated Funding Must crosswalk with the SF-424A and Budget Narrative.
- O Block 19 Mark Appropriate Selection; reference the <u>Intergovernmental</u> <u>Review (SPOC List)</u> from whitehouse.gov.
- Block 20 Select as appropriate.
- O Block 21 Must contain the name and contact information of the Authorized Representative of the grant agreement and match the signatory on the TM.

Note: The signature block is automatically populated by the GS user entering the amendment application and may not match the name of the Authorized Representative.

• SF-424A – Budget Information – Non-Construction Program

- Section A Budget Summary
 - Block 1(a) Grant Program must include: HVRP Homeless Veterans' Reintegration Program.
 - Block 1(b) Catalog of Federal Domestic Assistance Number: 17.805 Homeless Veterans' Reintegration Program.
 - Block 1(e)(g) Reflect amount of award requested must crosswalk to the SF-424, Budget Narrative, and TM.

Section B – Budget Categories

- All appropriate object class categories must be completed in column (1) and column (5).
 - a. Personnel For grant staff only.
 - b. Fringe Benefits For grant staff only.
 - c. Travel For grant staff only.
 - d. Equipment Per unit costs of \$5,000 or more.
 - e. Supplies For grant staff only.
 - f. Contractual Completed if grant recipient has a subrecipient, subaward, or contracted individuals to perform work for the grant recipient.
 - g. Construction Left blank (not allowable).
 - h. Other For participant costs, stipends, incentives, or items not covered elsewhere.
 - i. Total Direct Charges Reflects the sum of all direct object class categories.
 - j. Indirect Charges If a grant recipient is charging indirect, the allowable amount should be entered here. The grant recipient must have an approved Negotiated Indirect Cost Rate Agreement (NICRA), Cost Allocation Plan (CAP), or use the de minimis rate of 10 percent of modified total direct costs. See resources below for assistance with indirect charges.

- The National Veterans' Training Institute (NVTI) offers a <u>recorded webinar</u> regarding CAPs, different types of costs, and calculating the indirect cost rate against the allocation base.
- Questions or concerns can be directed to <u>Emily Wen</u>
 (Wen.Emily.W@dol.gov) at DOL's Cost and Price Determination Division.
- Section C Non-Federal Resources
 - N/A HVRP grant recipients are not required to complete this section.
- Section D Forecasted Cash Needs Section E Budget Estimates of Federal Funds Needed for Balance of the Project
 - N/A HVRP grant recipients are not required to complete this section.
- Section E Budget Estimates of Federal Funds Needed for Balance of the Project
 N/A HVRP grant recipients are not required to complete this section.
- Section F Other Budget Information
 N/A HVRP grant recipients are not required to complete this section.

IV. BUDGET NARRATIVE GUIDANCE

The Budget Narrative must reflect the total amount requested for PY 2024 and provide a description of costs associated with each line item on the SF-424A. **Grant recipients must use whole dollar amounts.**

Grant recipients may optionally complete and submit in GS the Microsoft Excel-based HVRP Budget Narrative Template. The HVRP Budget Narrative Template is a user-friendly, fillable, Microsoft Excel-based document designed to calculate totals by PY. It provides fields for the grant recipient to input details for each object class category in accordance with the development of the Budget Narrative. HVRP grant recipients may use the HVRP Budget Narrative Template, located on the HVRP Website under Program Documents, or create and submit their own Budget Narrative in GS.

Personnel: List all staff positions by title (both current and proposed) and include the roles and responsibilities as they pertain to the award. For each position, provide the annual salary, the percentage of time devoted to the project, and the amount of each position's salary funded by the grant.

Fringe Benefits: Provide a breakdown of the amounts and percentages that comprise each fringe benefit cost, such as health insurance, Federal Insurance Contributions Act (FICA), retirement, etc.

Travel: For grantee staff only, specify the purpose, number of staff traveling, mileage, per diem, estimated number of in-state and out-of-state trips, and other costs for each type of travel. This category should include allowable expenses to cover travel to DOL-sponsored training events such as the annual post-award conference, professional conference, and/or any other offered trainings. Grant recipients must provide justification for travel expenditures that exceed 10 percent of the one-year budget. Mileage reimbursements must not exceed the current federal mileage reimbursement rate and can be verified at the <u>U.S. General Services Administration</u> website.

Equipment: Identify each item of equipment you expect to purchase that has an estimated acquisition cost of \$5,000 or more per unit (or, if your capitalization level is less than \$5,000, use your capitalization level) and verify the item has a useful lifetime of more than one year. See 2 C.F.R. § 200.1 for the definition of "Equipment." Generally, DOL/VETS does not permit the purchase of equipment during the last funded year of the award. Prior approval is required only when the acquisition cost is \$5,000 or more, regardless of the non-federal entity's capitalization threshold.

Supplies: Supplies means all tangible personal property other than those described in the definition of Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life. Identify the categories of supplies for staff (e.g., office supplies) and, as needed, list the item, quantity, and total costs. Cost allocations for supplies that are not broken down by item must document their methodology in determining the amount allocated for this line item, per 2 C.F.R. § 200.405(d). Note: Supplies for participants should be placed in the "Other" line item. Project startup costs (e.g., purchase of laptops, office furniture, printers, and supplies with a useful life of more than one PY) should not be written into second- or third-year budget requests, unless there is reasonable justification for repurchasing described within this section.

Contractual: Under the Contractual line item, delineate contracts and subawards separately. Contracts are, as defined by 2 C.F.R. § 200.1, a legal instrument by which a non-federal entity purchases property or services needed to carry out the project or program under a federal award. A subaward, as defined by 2 C.F.R. § 200.1, refers to an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. For each proposed contract and subaward, specify the purpose and activities to be provided and the estimated cost.

Construction: Construction costs are **unallowable**, and this line item must be zero. Minor alterations to adjust an existing space for grant activities (such as a classroom alteration that does not involve construction costs) may be allowable, as DOL/VETS does not consider this to be construction. Such costs must be shown on other appropriate lines such as Contractual.

Other: Provide clear and specific detail, including costs, for each item so DOL/VETS can determine whether the costs are necessary, reasonable, and allocable. Project startup costs, (e.g., cell phones, tablets, and other items with a useful life of more than one PY) should not be written into second- or third-year budget requests, unless there is reasonable justification for repurchasing described within this section.

List items, such as participant support costs, stipends, or incentives, not covered elsewhere.

Indirect Costs: If you include an amount for indirect costs (through a NICRA or de minimis rate) on the SF-424A budget form, include one of the following:

• If you have a NICRA, provide an explanation of how the indirect costs are calculated. This explanation should include which portions of each line item, along with the associated costs, are included in your cost allocation base.

OR

• If you intend to claim indirect costs using the de minimis rate of 10 percent of modified total direct costs, please confirm that your organization meets the requirements as described in 2

<u>C.F.R.</u> § 200.414(f). Clearly state that your organization does not have a current negotiated (including provisional) rate and is not an organization described in <u>2 C.F.R.</u> § 200, Appendix VII(D)(1)(b).

Grant recipients choosing to claim indirect costs using the de minimis rate must use Modified Total Direct Costs (MTDC) (see 2 C.F.R. § 200.1 below for definition) as their cost allocation base. Provide an explanation of which portions of each line item, along with the associated costs, are included in your cost allocation base. Note that there are various items not included in the calculation of MTDC. See the definitions below to assist you in your calculation.

- 2 C.F.R. § 200.1 MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward (regardless of the PoP of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs, and the portion of each subaward in excess of \$25,000. Other items may be excluded only when necessary to avoid a serious inequity in the distribution of indirect costs and with the approval of the cognizant agency for indirect costs.
- The definition of MTDC in 2 C.F.R. § 200.1 no longer specifically allows any subcontracts to be included in the calculation. However, please note that subcontracts could be considered "subawards" based on guidance in <u>2 C.F.R. § 200.331</u>. You will also note that participant support costs are not included in MTDC. Participant support costs are defined below.
- 2 C.F.R. § 200.1 Participant Support Cost means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects.

Other Administrative Standards and Provisions: In accordance with <u>2 C.F.R. § 200.302(b)(7)</u>, grant recipients are required to have written procedures for determining the allowance of costs charged to the federal grants under <u>2 C.F.R. Part 200</u>, Subpart E (Cost Principles). Grant recipients must maintain standard operating procedures for the use of funds that support a successful job placement for an eligible participant.

V. CONSIDERATIONS

- Grant recipients must submit their Incremental Funding amendment application via GS to their respective GOTR by February 20, 2024.
- Grant recipients not requesting incremental funding must submit a TM via a grant note in accordance with this guidance.
- GOTRs should swiftly process these amendment applications, ensuring they meet program requirements, as outlined in this Technical Assistance Guide (TAG). **Note:** GOTRs are not authorized to deviate from the instructions and/or due dates contained in this guide. If the grant recipient is unable to meet the requirements, GOTRs are to notify their respective Regional Administrator for Veterans Employment and Training (RAVET), who will inform the Office of National Programs' Office of Grants and Training.
- The Office of Grants Management (OGM) is responsible for final review and approval of all Incremental Funding amendments.
 - o The Grants Management Specialist will review each amendment application for

- completeness and accuracy and move the amendment application forward to the Grant Officer for review and issuance.
- Once issued, the grant recipient will receive an email notification from GS that includes a link to the approved amendment. The recipient will be able to review the Notice of Award (NoA) and completed amendment. Grant recipients may receive a Condition(s) of Award (COA) on their grant. The grant recipient must respond to the requirements of the COA.
- The effective date of the award will be July 1 of each new PY.

VI. TECHNICAL ASSISTANCE

Grant recipients are to contact their GOTR for technical assistance on this TAG.

Grant recipients and GOTRs having technical GS issues should contact the GS Helpdesk: help@grantsolutions.gov at 1-866-577-0771 Monday through Friday, 8:00 a.m. to 6:00 p.m. ET.