



JAN 12 2015

VETERANS' PROGRAM LETTER NO. 01-15

MEMORANDUM FOR: ALL REGIONAL ADMINISTRATORS AND DIRECTORS
FOR VETERANS' EMPLOYMENT AND TRAINING
ALL STATE AGENCY ADMINISTRATORS
ALL REGIONAL ADMINISTRATORS, EMPLOYMENT
AND TRAINING ADMINISTRATION (INFO)

FROM: KEITH KELLY

A handwritten signature in blue ink that reads "Keith Kelly" is written over the printed name "KEITH KELLY".

SUBJECT: Jobs for Veterans State Grants Recurring Report Requirements

1. **Purpose:** To provide guidance to states on recurring reporting requirements for the Jobs for Veterans State Grants (JVSG).
2. **Rescissions:** Upon completion of all Fiscal Year (FY) 2014 recurring report requirements, this Veterans' Program Letter (VPL) supersedes VPL 01-10, Jobs for Veterans State Grant Reporting, dated January 15, 2010.
3. **References:** Title 38, United States Code (38 U.S.C.), Chapters 41 and 42; 2 Code of Federal Regulations (CFR) Part 200, et al; Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; 29 CFR Part 97, Uniform Administrative Requirements for Grant and Cooperative Agreements to State and Local Governments; 20 CFR Part 1010, Application of Priority of Service for Covered Persons; Special Grants Provisions for Jobs Veterans State Grants, dated July 7, 2014; VPL 07-09, Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in Whole or in Part by the U.S. Department of Labor, dated November 10, 2009; VPL 01-09, National Implementation of the Vocational Rehabilitation and Employment (VR&E) Program and Veterans' Employment and Training Service (VETS) Partnership Project, dated December 11, 2008; VPL 02-07, Annual Performance Incentive Awards for State Employees and Employment Service Offices, dated May 1, 2007; VPL 08-14, Designation for Additional Populations Eligible for Services from Disabled Veterans' Outreach Program (DVOP) Specialists: Transitioning

Service Members in need of Intensive Services; and Wounded, Ill, or Injured Service Members Receiving Treatment at Military Treatment Facilities or Warrior Transition Units (MTFs – WTUs); and the Spouses and Family Caregivers of such Wounded, Ill or Injured Service Members, dated September 26, 2014; VPL 04-14, Designation for Additional Population of Veterans Eligible for Services from Disabled Veterans Outreach Program Specialist – Veterans Age 18-24, dated April 10, 2014; VPL 03-14, Jobs for Veterans State Grants (JVSG) Program Reforms and Roles and Responsibilities of American Job Center (AJC) Staff Serving Veterans, dated April 10, 2014.

4. **Background:** VETS provides JVSG funding to states to staff and support two separate program positions: the Disabled Veterans' Outreach Program (DVOP) specialist and Local Veterans' Employment Representative (LVER). DVOP specialists and LVERs perform duties defined in 38 U.S.C., Sections 4103A, 4104 and VPLs 03-14, 04-14 and 08-14.

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

5. **FFY Quarterly Reports:** All quarterly reports and associated memoranda will include the state and grant number. As a condition for accepting JVSG funding, grantees must submit the following documented reports:

A. **Quarterly Fiscal Reports:** The quarterly fiscal year-to-date reports are due no later than (NLT) thirty (30) days after the end of the quarter being reported:

1st Quarter – January 30th of the following calendar year

2nd Quarter – April 30th

3rd Quarter – July 30th

4th Quarter – October 30th

5th Quarter (if applicable) – January 30th of the following calendar year

Final Fiscal Report – NLT April 30th of the following calendar year (if prior reports are not marked final).

(1) **Expenditure Detail Report (EDR).** The EDR provides detailed outlay and obligation information to ensure grant funds are spent in accordance with the approved budget submitted with the State Plan. EDRs also provide information on the number of staff paid by each funding source Base Positions Paid (BPP), i.e. DVOP Activities, LVER Activities and Special Initiatives. (Even though DVOP and LVER lines have been merged into one funding stream states are still responsible for reporting DVOP and LVER activities

separately on the EDR.) The EDR provides an analysis of the expenditures/obligations against the quarterly allocation to ensure that funds are being expended in accordance with the approved budget. EDRs are submitted electronically to the Director for Veterans' Employment and Training (DVET) for every quarter in which grant funds are obligated or expended, including the 5th quarter unless "final" is checked on both the DVOP and LVER quarterly reports in the 4th quarter. There are two forms available to the state depending on the type of accounting system used. The VETS 402A is for those states who provide quarterly expenditures and the VETS 402B is for states who report year-to-date (accrued) expenditures. The Office of Management and Budget (OMB) approved forms are available on the VETS homepage under the link http://www.dol.gov/vets/grants/state/jvsg_forms.htm

(2) **Federal Financial Report (FFR) (SF 425).** States are required to enter the data reported on the FFR (SF 425) into the Department of Labor's Grantee Reporting System (GRS). The states' JVSG award is identified by one grant number which is assigned by grants.gov upon submission of the 5-Year Plan. States must report expenditure and draw down information NLT 30 days following the end of the quarter. With the implementation of a single funding stream in FY 15, a single quarterly FFR will reflect the information for all expenditures associated with the JVSG program. The information contained on the FFR is required to match information encompassed on the EDR. Once the FFR information is entered into GRS and the EDR is submitted to the DVET, the information is reviewed for timeliness, accuracy and completeness; if the FFR report crosswalks to the information provided on the EDR, the DVET will accept the report in E-Grants. The state must notify the DVET once the FFRs have been certified in GRS.

B. Quarterly Performance and Narrative Report: Within forty-five (45) days of the end of each of the four FFY quarters, grantees will submit the following reports to the DVET electronically or in hard copy:

(1) **ETA 9002/VETS 200 Performance Reports:** Complete copies of the ETA 9002 (A-F) and VETS 200 (A-C) series reports on employment services provided and performance outcomes for the four quarter period that most recently ended and reported electronically to ETA.

(2) **Technical Performance Narrative (TPN):** The TPN submitted to the DVET must be signed by the State Agency Administrator or his/her designee who must attest that the report is accurate and complete. At a minimum, the TPN will contain the following information:

(a) An analysis of actual outlays and obligations compared to the planned budget approved by VETS and the Grant Officer. States should pay particular attention to the ratio of expenses for Personal Services (PS) and Personnel Benefits (PB) to total outlays and obligations to ensure this ratio is within +/- 5% of plan when compared to the PS plus PB to total (PS + PB/Total Expenditures) ratio for DVOP and LVER budgeted in the approved State Plan.

- (b) A justification to retain unobligated funding for use in future quarters of the same fiscal year. (Note: As per the Special Grant Provisions, grant funds that are identified as neither obligated, nor expended in accordance with the State Plan are subject to reallocation each quarter).
- (c) A 5th quarter spending plan, if required. The 5th quarter spending plan must include the anticipated amount remaining at the end of the 4th quarter along with a detailed plan to utilize such funds (submitted with the 3rd FFY quarter report only).
- (d) An overview of employment and wage outcome data reported on the ETA 9002 and VETS 200 reports with an analysis of the quarterly performance outcomes and the state's progress toward meeting Program Year (PY) negotiated performance goals. The analysis should identify current and/or anticipated issues that are impacting services to veterans and any actions planned or currently taken to address such issues.
- (e) An explanation of any anomalies reported on the Vocational Rehabilitation and Employment (VR&E) Tracking Report (VETS 201) and actions taken to resolve any issues.
- (f) An analysis and explanation of any services provided to non-veterans by DVOP specialist.
- (g) An analysis and explanation of any services provided by LVER staff, for example employer outreach.
- (h) An analysis of staff vacancy and utilization rates:
- i. The vacancy rate is a comparison of the number of Full-Time Equivalent (FTE) positions approved for each program to the actual average number of FTE employed year-to-date.
 - ii. The utilization rate is a comparison of the number of FTE positions approved in each program to the average number of Base Positions Paid (BPP) reported for that program.
- (i) An analysis and explanation of staff positions that were or are vacant or over for 60 days or more during the quarter reported, including actions taken to fulfill the state's staffing plan. This includes positions that became vacant in a preceding quarter and those filled during this quarter if the entire vacant period equaled or exceeded 60 days.
- (j) A report of each JVSG funded position filled by a non-veteran for a period of six months or more, including the rationale for staffing the position with a non-veteran.
- (k) A listing of special activities and/or best practices that have impacted services to

veterans and/or enhanced performance of DVOP specialists or LVER staff.

(l) A list of changes to the annually approved Staffing Directory (VETS 501) that occurred during the past quarter, i.e. names and office locations of newly assigned JVSG funded staff, staff no longer charged to JVSG, etc. Note: If there were no changes to the current staffing plan during the quarter, the state should indicate there were no changes in staffing.

C. Manager's Report on Services to Veterans. Included in the quarterly reporting requirements are the Managers Reports on Services to Veterans mandated by U.S.C. 4104(f) which requires a report on employment and training services provided to veterans and eligible persons by the local American Job Center (AJC) or supported area. This narrative report is provided to the DVET no later than 45 days following the end of each FFY quarter.

(1) The Manager's Report may be submitted electronically or in hard copy and must include information on:

(a) Eligible veterans and eligible spouses with Significant Barriers to Employment (SBE) enrolled in case management by or staff-assisted career services from staff assigned to the local AJC office.

(b) Outreach efforts to locate and serve veterans and eligible spouses with SBEs.

(c) Outreach efforts to employers and other organizations to promote the hiring of veterans and other eligible persons.

(d) Compliance with Priority of Service requirements established at 38 U.S.C. 4215, 20 CFR, Part 1010, and VPL 07-09.

(2) The Manager's Reports are used by state agency management and the DVET to:

(a) Ensure the approved State Plan on services to veterans is understood and executed at the AJC level.

(b) Identify the need for technical assistance or other actions needed to ensure that priority services are provided to veterans and other eligible persons in accordance with applicable laws and regulations.

(c) Complete the TPN submitted to the DVET.

(3) All AJCs receiving Department of Labor's funds to provide employment and training services to veterans must be covered by a report. At a minimum; a report is submitted by each AJC where grant-funded staff are assigned as a primary duty location, assigned responsibilities on a part-time or interim basis and for every AJC where veterans and eligible spouses most in need of intensive services receive case management (other than

those provided by Workforce Investment Act staff resources). All other AJCs may be reported on individually, regionally, or by some other division determined appropriate by consultation and agreement of the state agency and DVET.

(4) Each Manager's Report narrative will include the following required information:

- (a) Time Period Covered: Fiscal year and quarter.
- (b) Office or Area Covered: Name and location or description of AJC or area covered.
- (c) Report Author: Name of individual(s) primarily responsible for the preparation and/or submission of the report.
- (d) Case Management: Provide the following information:
 - i. Number of eligible veterans and eligible spouses with SBEs, or other eligible veterans, newly enrolled in case management this quarter.
 - ii. Number of veterans exiting case management this quarter.
 - iii. Of the veterans exiting case management, the number:
 - That entered employment or improved wages.
 - That achieved another successful outcome such as disability or other compensation sufficient to be sole source of income.
 - The number that terminated case management without a successful outcome.
 - iv. The number of veterans served who were referred by VR&E.
- (e) DVOP Outreach to Veteran Efforts: Summarize efforts made by grant-funded staff to locate veterans and other eligibles with SBEs particularly those targeted for specialized services in the State Plan and the results of those efforts.
- (f) LVER Outreach/Capacity Building Efforts: Summarize Outreach efforts to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups; and facilitating employment, training, and placement services furnished to veterans in a state under the applicable state employment service delivery systems:
 - i. To promote the hiring of veterans and other eligible persons and the results of those efforts.

- ii. To inform them of incentives for hiring and training veterans such as apprenticeships and on-the-job training.
- iii. To develop employment opportunities for veterans or other eligible persons.
- iv. For the above job development contacts, provide the number of veterans who subsequently entered employment.

(g) **Priority of Service:** Describe how veterans and covered persons receive priority of service in all Department of Labor funded programs in the AJC or area covered by the Managers Report. Specifically provide the following information:

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

(h) **Success Stories/Best Practices:** Describe any noteworthy successes and/or best practices.

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

D. VR&E Tracking Report (VETS 201): The VR&E Tracking Report is used to record information on veterans participating in the Department of Veterans Affairs' Chapter 31 program that are referred to DVOP specialists. The information provided on the report is used to track the status of referred participants, referral and registration dates, and outcomes. In accordance with VPL 01-09 or most current VPL on the subject, the state designated Intensive Service Coordinator (ISC) forwards the completed VETS 201 to the DVET no later than 30 days after the last day of the reporting quarter.

6. Annual Incentive Award Report: States with approved Incentive Award Plans must obligate any funds to be spent in accordance with their Award Plan by September 30th of the FFY for which the plan was approved.

A. An annual Incentive Awards Report on those obligations or expenditures must be provided in accordance with VPL 02-07 (or the most current VPL on the subject of Incentive Awards). Since the report is due with the 4th Quarterly Report, it is due no later than November 14th of each FFY in which Incentive Award funding is obligated. It may be submitted electronically or in hard copy. Specifically, the report must detail all incentive awards made to individuals and to offices by:

- (1) Identifying all individual staff award recipients by name and title;
- (2) Identifying all office recipients by office name, location, type of office (e.g., AJC, AJC affiliate, Employment Service Office, etc.) and;
- (3) Including a description and value of each award.

B. Incentive Award funds should be expended in accordance with the approved State Plan. VETS will review each state's report to identify Incentive Award funds not obligated by September 30th and may authorize states to carry these funds into the next fiscal year to be obligated on a first-in, first-out (FIFO) basis in the 5th quarter. If this occurs, VETS may reduce the state's allocation for the subsequent fiscal year by an amount equal to the unobligated Incentive Award funds carried in from the previous fiscal year.

C. The amounts obligated or expended on Incentive Awards in any quarter is reported on the appropriate area of the EDR and included in the totals on the FFR entered in GRS. If there are differences between the amounts reported on the report due NLT October 30th and the actual expenditures incurred before December 31st, the first Incentive Award Report should be corrected and an explanation included in the appropriate quarterly TPN.

7. Fifth Quarter, Final and Closeout Fiscal Reports: When authorized by the Department of Labor's annual appropriation, JVSG funds not obligated by September 30th are allowed to be carried into the first quarter of the next fiscal year or the 5th quarter. States are strongly encouraged to carry this funding forward and use it on a FIFO basis for staffing.

A. Fifth Quarter Funding: Prior to obligating carry-in funds for any purpose including staffing, conferences, training or equipment, states are required to submit a 5th quarter spending plan to their respective DVET. States should forecast spending for the remainder of the year at the end of the 3rd quarter and if required, submit a 5th quarter spending plan with the third quarter report. The 5th quarter spending plan must include the anticipated amount that will be remaining at the end of the FY along with a detailed plan for expenditure of such funds. This spending plan must be approved by the Regional Administrator for Veterans' Employment and Training (RAVET). States may assume the spending plan is approved unless informed otherwise by the DVET prior to September 30th.

B. Carry Over Funding: Funds not obligated for prior FY purposes and carried over into the 1st quarter of a new FY must be used as defined in the 5th quarter spending plan, on a FIFO basis and must be apportioned to each object class category proportionately with the amount

of the next fiscal year's first quarter funds that are obligated. When funds are expended or obligated in the 5th quarter, fiscal reports completely separate from the concurrent 1st quarter report must be submitted. These reports will include a FFR, an EDR, and a transmittal memorandum that explains how the funds were utilized. States are required to designate one of the Quarterly Reports as a "Final" fiscal report. The timing for the report is dependent upon the quarter in which the state determines that all obligations for the program are known and have been liquidated. All 4th quarter and subsequent financial reports must be identified as either final or not final by checking the appropriate boxes on the FFR and EDR.

C. Final Fiscal Report: The final fiscal report is submitted with a transmittal memorandum to the DVET no later than 30 days after the end of the quarter in which all obligations are liquidated but in all circumstances, no later than April 30th of the following fiscal year. The final fiscal report will include the following information:

(1) When all fiscal year obligations are liquidated at the end of the 4th quarter (September 30th).

(a) The 4th quarter report due October 30th can be considered "Final" by checking the appropriate blocks on the FFR entered into GRS and on the EDR; or

(b) A separate "Final" report is due no later than January 30th of the following fiscal year.

(2) When all fiscal year obligations are liquidated at the end of the 5th quarter (December 31st).

(a) The 5th quarter report due January 30th of the following fiscal year can be considered "Final" by checking the appropriate blocks on the FFR and EDR; or

(b) A separate "Final" report is due NLT April 30th of the following fiscal year;

(3) When funds obligated in the 5th quarter are liquidated in the 2nd quarter of the next fiscal year, states will enter a properly annotated FFR into GRS and submit a final EDR NLT April 30th of the next fiscal year. This is the only circumstance in which states should use the "Final" worksheet in the EDR workbook.

D. Closeout Report: GRS requires a closeout report for all grants. The closeout report can only be submitted after the final quarter report has been entered and certified in GRS. To access the closeout report, select the quarter in which the final report was submitted. The cumulative data from the final report is carried forward into the closeout report. A new cumulative column is available to update closeout entries if needed. If data is changed in the closeout report, a new final EDR and transmittal memorandum explaining the changes must be submitted. If no data is changed, entry of the closeout report into GRS along with a corresponding EDR is all that is required. The close out report is certified by the state for review and acceptance by the DVET.

8. **Submission of Reports:** States will submit all reports in accordance with the following due dates and distribution guidelines. When a due date falls on a holiday or weekend, the report is due the last work day prior to the due date. When states experience problems submitting or validating performance reports (the ETA 9002 and VETS 200 series reports) they should not delay submitting the quarterly fiscal reports.

Report	Due Date	Method of Submission
JVSG Quarterly Fiscal Report (required 4 times/year)		
FFR	NLT 30 days after the end of each FFY quarter	Entered into GRS by grantee
EDR	NLT 30 days after the end of each FFY quarter	Electronically or hard copy to DVET
Quarterly Performance and Narrative Report (required 4 times/year)		
ETA 9002 (A-F) VETS 200 (A-C) TPN	NLT 45 days after the end of each FFY quarter	Electronically or hard copy to DVET
5th Quarter Spending Plan (if applicable, 1 time/year)		
As part of 3rd Quarter TPN	NLT August 14 th	Electronically or in hard copy to DVET
5th Quarter Fiscal Report (if applicable)		
FFR	January 30 th	Entered into GRS by grantee
EDR and Transmittal Memorandum	January 30 th	Electronically or in hard copy to DVET
Final Fiscal Reports		
FFR	4 th Quarter Final – October 30 th or 5 th Quarter Final – January 30 th or Last Quarter Final – April 30 th	Entered into GRS by grantee
EDR and Transmittal Memorandum	4 th Quarter Final – October 30 th or 5 th Quarter Final – January 30 or Last Quarter Final – April 30	Electronically or in hard copy to DVET
Manager's Report on Services to Veterans		
Manager Report	45 days after the end of each FFY quarter	Electronically or in hard copy to DVET

Report	Due Date	Method of Submission
Closeout Fiscal Report		
FFR	Dependent on when Final Report is entered into GRS	Entered into GRS by grantee
EDR and Transmittal Memorandum*	Dependent on when Final Report is entered into GRS	Electronically or in hard copy to DVET
Annual Incentive Awards Summary Report (if applicable)		
Incentive Report	November 14 th of the following FY	Electronically or in hard copy to DVET

* Required only if changes are made to Final Report data

9. **Actions Required:**

A. DVETs will meet with the State Agency to determine whether each AJC within the state will provide a Manager's Report on Services to Veterans individually, regionally, or by some other division. Note: This action item should be accomplished each fiscal year when a new staffing plan is submitted.

B. States will submit all recurring reports in accordance with the instructions provided in the directive. DVETs will provide technical assistance as needed or requested.

C. DVETs will thoroughly analyze information provided in all reports and forward those reports required by the region to the RAVET with any recommendations regarding reallocation of unobligated funds.

D. RAVETs will review all submitted reports and recommend approval or disapproval of the DVET recommendations.

E. RAVETs will provide a summary of findings to the DVET when the review is complete.

F. DVETs will notify states when the review of each JVSG Quarterly Report (including 5th quarter, Final, Closeout and Annual Incentive Awards Report) is complete. Upon this notification, states will forward the signed originals of the most current, approved documents to the Grant Office at:

Department of Labor
Procurement Services Center
Room N-2458
200 Constitution Avenue NW
Washington, DC 20210
(202) 693-4570

Because all mail that is sent through the U.S. Postal Service is irradiated, states are encouraged to use FedEx, UPS, or other non-U.S. Postal Service carrier to forward reports to the Grant Officer.

10. **Inquiries**: Grantees may address questions to their DVET. DVETs or other VETS staff with questions should contact their RAVET. RAVETs may contact the JVSG Program Lead at the National Office.

11. **Expiration Date**: When rescinded or superseded.