

VETS Manual Series, Volume VIII
The Jobs for Veterans State Grant

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8.1 Introduction

This volume is intended to explain the processes and activities involved in administering the Jobs for Veterans State Grant. It covers grant application, award, reporting, modification, monitoring, and closeout, as well as reallocation of funds, technical assistance, and corrective actions.

Text in this volume is hyperlinked to current statutes, regulations, policy guidance, directives, and related information. Each item in the Table of Contents is hyperlinked to the corresponding section of the manual. Each major section title, i.e. 8.1 Introduction, is hyperlinked back to the top of the Table of Contents. Section titles of subsections are hyperlinked to the next higher section title.

Some of the information appears verbatim in more than one section of this manual. This was done intentionally to make each section stand alone as a complete reference for a particular action. As an example the information provided on the Staffing Directory is the same in the section on Solicitations for Grant Applications, Annual Funding Requests, and Interim Modifications. While this does add length to the overall volume, the hope is that it makes it easier to use as an online reference tool.

8.1.1 History of the Jobs for Veterans State Grant

The Servicemen's Readjustment Act (Public Law (P.L.) 346, 78th Congress), commonly known as the G.I. Bill of Rights, was passed in 1944 to assist veterans reintegrating into the civilian workforce. It reestablished the Veterans' Employment Service and provided for the appointment of Local Veterans' Employment Representatives (LVER staff).

The 92nd Congress passed the Vietnam Veterans' Readjustment Assistance Act of 1972 (P.L. 92-540) which extended priority service for employment counseling, job training and placement services to Vietnam era veterans. This landmark legislation also extended veterans' priority to widows and spouses of totally disabled veterans, prisoners of war, and servicemen missing in action and required the Secretary of Labor to implement stringent administrative controls to ensure the delivery of preferential services to veterans.

In 1977, President Carter issued an Executive Order that created the Disabled Veterans' Outreach Program (DVOP) as a pilot under the Comprehensive Employment and Training Act (CETA). Staffed in Job Service offices, DVOP specialists conduct outreach in their communities to identify and encourage veterans to use the employment service.

Passed in 1980, P.L. 96-466 established the DVOP as a permanent program and placed DVOP specialists and LVER staff under a new Assistant Secretary for Veterans' Employment (ASVE). The ASVE was renamed by Secretary's Order 4-83 on March 24, 1983 to the Assistant Secretary for Veterans' Employment and Training (ASVET).

The Veterans' Employment, Education and Counseling Amendments of 1988 (P.L. 100-323) detailed position duty statements for Federal and State staff down to the DVOP and LVER positions in the states including hiring and reduction-in-force protections. The Act revised Chapter 41 of Title 38, U.S.C. and added in Chapter 42, the requirement of VETS to monitor and report the affirmative action hiring of veterans by Federal contractors (38 U.S.C. 4212), and affirmative action requirements for hiring and advancement within Federal agencies (38 U.S.C. 4214).

In 1998, President Clinton enacted the Workforce Investment Act (P.L. 105-220) to replace the Job Training Partnership Act (JTPA) and required labor exchange services be provided through a One-Stop Career Center concept. This legislation defined intensive services to include case management.

President Bush enacted the Jobs' for Veterans Act (P.L. 107-288) on November 7, 2002. This legislation revised Chapters 41-43 of Title 38 to give states more latitude in the conduct of their DVOP and LVER staff and placed more emphasis on accountability. It requires states to submit a detailed plan of services to veterans, requires the ASVET to monitor the distribution and use of the funds by the states, and mandates priority of service to veterans for all employment and training programs funded in whole or in part by the Department of Labor.

8.1.2 Jobs for Veterans State Grant Objectives

The objectives of the JVSG grant are clearly spelled out in the "[Purpose](#)" of 38 U.S.C. Chapter 41 where Congress declares that there will be "an effective job and job training program and an employment placement program for veterans and other eligible persons" that maximizes employment and training opportunities for covered persons (38 U.S.C. 4102). This section further stipulates that priority will be given to the "needs of disabled veterans and veterans who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized through existing programs, coordination and merger of programs and implementation of new programs, including programs carried out by the Veterans' Employment and Training Service to implement all efforts to ease the transition of service members to civilian careers that are consistent with, or an outgrowth of, the military experience of the service members."

8.1.3 Applicable Policy Guidance (In Order of Precedence)

- [Federal Statutes](#)
- Public Laws (P.L.) (until codified into law)
- [P.L. 109-461](#)
- [Federal Regulations](#)
- [Solicitations for Grant Applications \(SGA\)](#)
- [General Grant Provisions](#)
- [Special Grant Provisions](#)

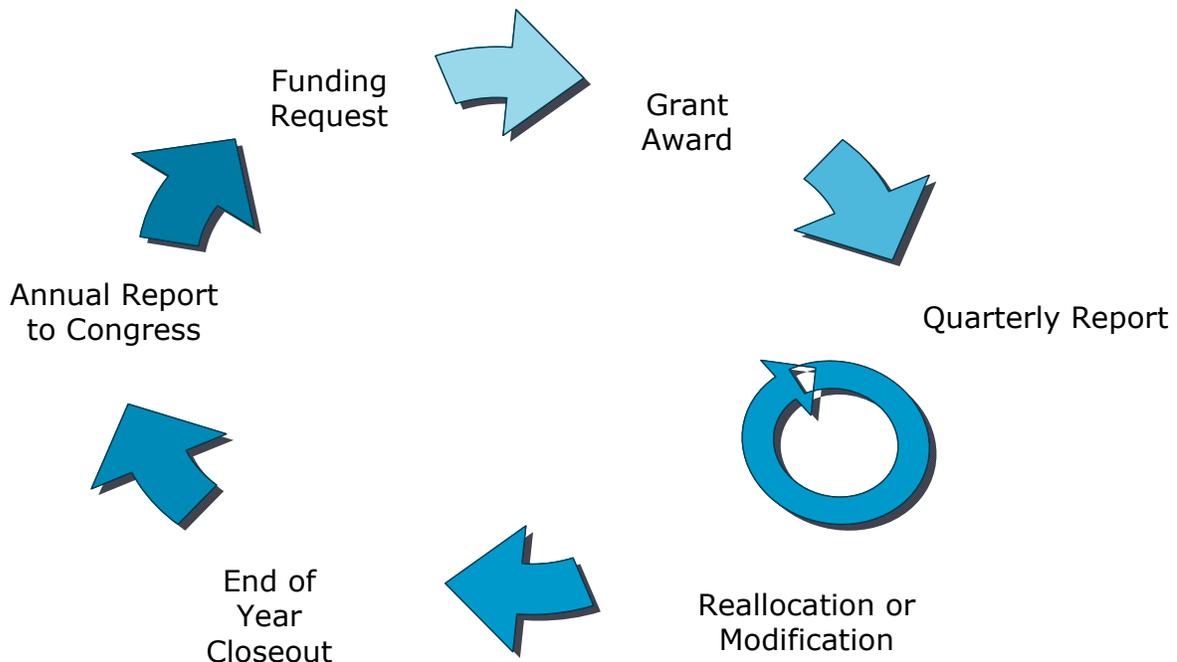
- [ASVET Memos](#)
- [DMs](#), and
- [VPLs](#)

8.1.4 Lifecycle of the Jobs for Veterans State Grant (JVSG)

The JVSG are multi-year discretionary formula program grants whose grantees receive annual funding determined by a formula allocation.

The 5-year lifecycle begins with the issuance of a Solicitation for Grant Applications or SGA. In response to the SGA, states submit a 5-year plan for service to veterans including a funding request for the first fiscal year. The Grant Officer issues grant awards when the plans are approved and makes funding available through subsequent quarterly Notices of Obligation Authority (NOAs). States operate the grant throughout the year and submit quarterly fiscal and performance reports.

In each subsequent year of the 5-year cycle, VETS issues guidance on submission of Annual Funding Modification Requests. States submit new funding requests for the fiscal year and modify their state plans as needed. When approved, the cycle of grant award, NOA, and quarterly reports repeats. Within each year of the 5-year grant lifecycle, there is an annual funding and expenditure lifecycle:



8.1.5 Agency Responsibilities

The ASVET is charged with administering VETS' grant programs by ensuring funds are expended efficiently, effectively, and in compliance with all legislation and regulations. The ASVET is charged with reporting the actual achievements of state grantees compared with the goals stated in their grant applications in an annual report to Congress.

The Office of Operations, Grants and Transition Programs, through the Employment and Training Programs Division, is responsible to review all JVSG requests and reports submitted by field staff to prioritize requests and make recommendations for actions to the ASVET. This includes grant applications, requests for additional information or clarification, quarterly fiscal and performance reports, and modification requests for changes to grant scope, cost or conditions.

A JVSG Program Grant Officer has delegated authority from the Secretary of Labor to obligate funds on behalf of DOL. The Grant Officer is personally responsible for ensuring (1) there are sufficient funds to obligate, (2) that the terms of the grant agreements are reasonable, and (3) that the goals of the grant program are met. The Grant Officer signs each grant agreement on behalf of the Department, making it a legally binding instrument. Additionally, the Grant Officer reviews all grant applications and modification requests for compliance with governing statutes, regulations, departmental policies and the SGA or applicable policy guidance.

8.1.6 DVET Role and Responsibilities

The DVET plays an important role in the administration of grants, particularly in terms of fiduciary responsibility. In most cases, it is the DVET who is appointed as the Grant Officer's Technical Representative (GOTR). As an advocate for the program, the DVET is involved with his or her state's grantee, providing technical assistance regarding their drafting of grant applications and modification requests to ensure they meet the requirements of the applicable guidance.

The DVET role as the GOTR is a very dynamic and significant one. The GOTR is the public face of VETS and impacts how grantees view the Agency. Equally important, the GOTR acts as a "coach" to grantees, brokering technical assistance and guiding the progress toward desired outcomes. The performance of VETS' grants directly impacts the Agency's overall performance toward meeting its strategic goals and legislated mandates. Also encompassed in the role of "coaching" is the function of oversight to ensure that funds are expended effectively and appropriately.

In performing these various roles, the challenge for the GOTR is to strike a delicate balance between coaching and monitoring compliance issues. Ideally, the GOTR will identify potential problem areas that he or she can solve with appropriate technical assistance. As the GOTR, the DVET monitors compliance through review of Quarterly Fiscal and Performance Reports submitted by grantees and the Self-Assessment and Validation Reviews of local offices. Each is discussed in detail in the appropriate section of this volume.

8.2 JVSG Formula Grant Funding

Congress appropriates funds from the Unemployment Trust Fund (UTF) National Account annually to support the multi-year JVSG formula grants. These appropriated funds are included in the VETS annual budget and must be obligated in the Federal Fiscal Year (FFY) for which they are appropriated or they are returned to the U.S. Treasury. These funds are obligated by entering into annual grant agreements with the individual states. Once awarded, VETS makes the funds available for states to draw down for spending in accordance with their approved spending plans.

The funds VETS provides to states to meet their obligations are, therefore committed funds although they may not actually change hands. To illustrate the term 'obligated,' consider a salary check. The take-home pay of most individuals is not free and clear to be spent at their complete discretion even though taxes and other deductions may have already been taken. Most workers have also committed, or obligated, some of their paycheck for such items as a mortgage or rent payment, car payments, or loan repayment. Because the worker is legally committed to making those monthly payments, most of the periodic salary check may already be obligated funds. Even if he or she has the luxury of leaving the paycheck in a savings or checking account for a few weeks before payment is due, the money, while it has not changed hands, is obligated.

UTF funds provided for grants may be obligated at two levels. First, VETS obligates them by entering into grant agreements for programs that will begin during the fiscal year for which Congress appropriated the funds. Second, the grantee either spends or obligates the funds during the funding period which is defined in the annual appropriation.

8.2.1 The Funding Formula

In accordance with 38 U.S.C. §4102A(c)(B)(i)(I) and (II), "...the Secretary shall make available to each state with an application approved by the Secretary an amount of funding in proportion to the number of veterans seeking employment using such criteria as the Secretary may establish in regulation, including civilian labor force and unemployment data, for the state on an annual basis. The proportion of funding shall reflect the ratio of—

- (I) the total number of veterans residing in the state that are seeking employment; to
- (II) the total number of veterans seeking employment in all states."

The funding formula used to determine base grant allocation amounts for DVOP and LVER funding for all states can be found at [20 CFR Part 1001](#). It uses two statistical data sources provided by the Bureau of Labor Statistics (BLS):

- [Current Population Survey \(CPS\)](#) – most reliable source of current state level data on the number of veterans in the civilian labor force. However, because the sample size of veterans at the state level is so small, the use of CPS to

determine veterans' unemployment rates at the state level is subject to large relative sampling errors; and

- [The Local Area Unemployment Statistics \(LAUS\)](#) - considered the most highly reliable data on the general rate of unemployment at the state level, it does not contain the large sampling error found in the CPS. Furthermore, the Office of Management and Budget (OMB) requires Agencies allocating Federal funds that include unemployment as a factor to use LAUS as the indicator of unemployment, unless the authorizing statute specifies otherwise (OMB Statistical Policy Directive 11).

Each year BLS adjusts the LAUS data for the prior three years and releases the adjusted results to the public in late February or early March. The state level veteran civilian labor force data are from the CPS, and are made available to VETS by BLS as a custom tabulation each year for the prior year, shortly after the release of the LAUS data. The state level data from both of these sources for the most recent three calendar years are averaged for inclusion in the funding formula.

After deducting funding for centralized agency costs from the amount forecast in the annual budget projection, the amount available for the JVSG program is allocated to the states as follows:

Step 1: Calculate the general unemployment distribution of individuals across all states:

$$\frac{\text{Average \# unemployed individuals/state (3-year LAUS)}}{\text{Average \# unemployed individuals/all states (3-year LAUS)}}$$

Step 2: Calculate the veteran labor force distribution across all states:

$$\frac{\text{Average \# veterans in civilian labor force/state}}{\text{Average \# veterans in civilian labor force/all states}}$$

Step 3: Sum the two distributions for each state:

$$\begin{array}{ccc} \text{General unemployment} & + & \text{Veteran civilian labor force} \\ \text{distribution for each state} & & \text{distribution for each state} \end{array}$$

Step 4: Average the two distributions for each state:

$$\frac{\text{Sum of the two distributions for each state}}{2}$$

Step 5: Calculate the base grant allocation for each state:

Average of the two distributions for each state x Base Grant amount available for allocation to all states

Three years of averages of the LAUS and the CPS data are used in the funding formula to mitigate the impact annual shifts in population and unemployment data would have on individual state funding.

All funding projections are based on projected budget numbers. If the actual appropriation is more or less than that used in the allocation forecast, the Secretary may recalculate and redistribute funds. The Secretary will make every effort to avoid this situation in order to maintain delivery of services to veterans and reduce the administrative costs of submitting new requests for funding.

8.2.2 Minimum Funding

As authorized by 38 U.S.C. §4102A, the ASVET has established a minimum funding level for grantees receiving funding under the JVSG. The criteria used to establish the minimum funding level is described in [20 CFR 1001.152](#) which states "a minimum funding level is established to ensure that, in any given fiscal year, no state will receive less than 28 percent (0.0028) of the previous year's total funding for all states. If the appropriation for a given fiscal year does not provide sufficient funds to comply with the hold-harmless provision, the Department will:

- Update, as appropriate, the state estimates of TAP workload and reserve sufficient funds for that purpose from the total amount available for allocation to the states.
- Apply proportionally the remaining balance available for basic grant allocations to the states for that fiscal year.

The proportion will be calculated by dividing the remaining balance available by the total estimated state basic grant allocations for that fiscal year. The proportion resulting from that calculation will be applied to each state's estimated basic grant allocation to calculate the amount to be awarded." The minimum funding level for an individual state in FY 2009 is \$500,000.

8.2.3 Incentive Award Funding

Beginning in FY 2004, one percent (1%) of the amount of each state's grant award has to be set aside for "the purposes of making cash awards under the program of performance incentive awards..."

The JVSG Incentive Award Program exists to:

- Encourage the improvement and modernization of employment, training and placement services for veterans; and to

- Recognize the efforts of eligible employees for excellence in how they provided such services or for having made demonstrated improvements in providing services to veterans.

VETS describes the criteria for acceptable Incentive Award Programs in [guidance](#) issued to states. The program provides flexibility to states, allowing them to recognize individual employees, groups, and entire offices. Recipients are not limited to JVSG funded staff, but volunteers, VA Work Studies, and Federal employees are prohibited from receiving these grant funds. VETS policy allows for a variety of awards to accommodate different state laws and union agreements. Non-monetary awards to individuals such as t-shirts, ball caps, plaques and trophies were determined to be insufficient to constitute Incentive Awards. Even with the flexibility allowed in law and policy, some states choose not to develop Incentive Award plans and others are prohibited from doing so by state law or union agreements.

States are required to address plans for Incentive Award Programs in their State Plan for Services to Veterans, commonly referred to as the State Plan. When requested, the Plan must describe its objectives, eligible recipients, selection criteria, the awards themselves and the means for disbursement to be approved.

States with approved Incentive Award Plans must submit a detailed annual Incentive Award Report listing:

- All awards made to individuals to include the recipient's name, office, and award amount or value; and
- All awards made to offices to include the office location and award amount or value.

8.2.4 Transition Assistance Program (TAP) Funding

TAP was established to give employment and training information to armed forces members within twelve months of separation or two years of retirement and their spouses. These workshops ease the initial transition from military service to the civilian workplace. TAP Employment Workshops are facilitated by professionally-trained staff from the state employment agency, most of whom are DVOP specialists or LVER staff or through contracted staff provided through a contract vehicle at the National Office. All employees who facilitate workshops must receive required training from NVTI.

State grantees that elect to facilitate TAP Employment Workshops may request funding in addition to the annual formula-derived allocation. The amount of funding requested is based on the number of workshops projected by the TAP site manager or equivalent. In accordance with [the current MOU](#), all TAP Employment Workshops should be two and a half (2 ½) days in length. State grantees are allowed to request funding for up to 3 days per workshop. The additional half-day is to support the facilitator's planning and preparation time.

8.2.5 Special Initiative Funding

Short-term funding for Special Initiatives may be available for states that submit “unique or innovative” proposals for programs or services for veterans. Special Initiative funding covers a specified period of time with no expectation that it will be continued or re-approved for subsequent timeframes. DVETs will provide necessary technical assistance to states in the development of, planning for, and proposals so support any Special Initiatives.

Assignment of state personnel to a temporary Federal position under the Intergovernmental Personnel Act (IPA) is considered a Special Initiative. The two primary uses of IPA contract staff are assignments to the VETS National Office to assist with program operation and as state Recovery and Employment Assistance Lifelines (REALifelines) Coordinators. When an IPA contract spans two fiscal years, states may request funding for the balance of the contract (the second fiscal year) with their annual funding request. Funding requests for all other Special Initiatives will be submitted as a stand-alone modification to the State Plan that:

- Demonstrates and describes the scope of the program;
- Provides an understanding of the need for the proposed services and planned activities; and
- Indicates the expected quantifiable outcomes of the proposal.

8.2.6 Reallocation of Funding

Fiduciary duty is a legal relationship of confidence or trust between two or more parties, most commonly a *fiduciary* and a *principal* or beneficiary. In a grant fiduciary relationship, one entity (the grantor) places good faith confidence and trust in another (the grantee) whose resources and services are sought in some matter. In such a relationship, both parties should act at all times to achieve the purposes and goals of the grant.

VETS has a fiduciary responsibility to:

- Ensure the maximum amount of grant dollars possible is made available to recipients (state agencies) through the formula allocation process;
- Clearly state the purpose of the grant funds and outcomes expected of recipient agencies;
- Approve State Plans only when they meet the requirements of legislation, regulation and policy;
- Provide reporting mechanisms that allow the Agency to closely monitor use of grant funds to ensure recipients adhere to their approved State Plan, use generally accepted accounting principles to report expenditures, charge “fair share” costs in accordance with plans approved by the Division of Cost Determination, and develop approvable plans for unobligated funds each quarter;

- Monitor program and fiscal activities of state agencies through analysis of quarterly reports, desk audits, and on-site validation reviews; and
- Recommend to reallocate unobligated funds in a timely manner to ensure grant funds are used to enhance employment of veterans and are not returned to the U.S. Treasury unspent.

8.2.6.1 GOTR Technical Assistance

As the GOTR, the DVET will provide all necessary technical assistance needed to help state agencies develop effective fiscal plans that are the most advantageous to veterans and other eligible persons served. Throughout the fiscal year, the DVET/GOTR will monitor fiscal reports to ensure they are accurate and that the state is spending according to their approved Budget Plan.

Forty-five days following the end of each FFY quarter, states are required to report fiscal and programmatic progress and status to the DVET/GOTR. When unobligated funds are reported, the DVET/GOTR will provide technical assistance to help the state develop a viable plan to expend the unused funding in a manner that will improve employment outcomes for veterans. The DVET/GOTR will follow the most recently issued [guidance](#) to submit an analysis to the RAVET. In this analysis, the DVET/GOTR must identify any unobligated funds that remain with the state and:

- Explain why the surplus exists;
- Describe any future plans the state has to retain the unused funds, i.e. maintain staffing in remaining quarters, conduct training conferences, make computer upgrades, etc.; and
- Provide a recommendation as to whether or not the state should maintain control of the funds or if VETS should reallocate those funds for another purpose.

8.2.6.2 RAVET Actions

The RAVET will complete a thorough review of all reallocation recommendations in accordance with the most recently issued [guidance](#). The RAVET will consult with the DVET/GOTR if he/she has any questions or concerns. After a complete analysis, the RAVET will approve or disapprove the DVET/GOTR's recommendation based solely on optimal use of grant funding for veterans nationally. In other words, even though a state may develop a plan to use all unexpended funding, the RAVET must determine if it best serves veterans overall or might be used more effectively by another state with a pending modification request. The RAVET forwards concurrence or non-concurrence to the National Office and Jobs for Veterans Lead Center via the Regional rollup report. When a decision is made to reallocate, the National Office and the Jobs for Veterans Lead Center take the actions necessary to reduce by determined amounts from the unused balances future allocations to the state.

8.2.6.3 How Reallocations are Effected

Reallocation is typically effected by reducing the funding provided with the next NOA issued. The amount of unobligated funding identified for reallocation is subtracted from the next allocation for that program or sub-program. For example, if a GOTR identifies and the RAVET recommends \$20,000 of a state's unobligated DVOP funds for reallocation based on the second quarter report (period ending March 31st and reported to the GOTR by May 15th), \$20,000 of funds would be subtracted from the DVOP section of the NOA issued for the fourth quarter funding (July 1st through September 30th). Grant funds remaining beyond the fourth quarter and carried into "fifth quarter" would potentially be subject to reallocation from the subsequent fiscal year's funding by reducing the second quarter NOA unless the state submits with their fourth quarter report and the RAVET subsequently approves a spending plan for obligating the unexpended fourth quarter funds during the fifth FY quarter.

8.3 Solicitation for Grant Applications (SGA)

The JVSG application process begins with the issuance of a Solicitation for Grant Applications or SGA, issued every five years by VETS. The SGA serves as notification to grantees that they must submit a State Plan for Services to Veterans (referred to as the State Plan) and a Budget Plan for the first fiscal year of funding. The SGA outlines the criteria for an approvable State Plan. The State Plan is approved for five Federal fiscal years, but in accordance with VETS' annual appropriation is funded in five separate annual grant awards. The DVET in each state should be very familiar with the [most current SGA](#) to enhance their ability to provide technical assistance to State Agencies.

The SGA provides grantees with detailed information on eligible applicants, the grant period, application requirements and due dates, allocated funding amounts, standards of performance, grant-funded staff assignment and responsibilities, accounting principles, etc. SGAs for grants that are awarded competitively must be published in the Federal Register. However, since State Agencies are the only eligible recipients of the JVSG, the JVSG SGA is transmitted to through a VPL. The [General Grant Provisions](#) that apply to all DOL grants are typically provided. Draft [Special Grant Provisions](#) that are unique to the JVSG are usually provided for comment with the SGA as well.

The SGA describes what the [State Plan](#) must contain for the state to receive JVSG funding. As such, it is the primary instrument used to transmit prioritized goals and objectives for grant fund usage. For instance, the SGA may transmit the Agency's priorities for targeting certain categories of veterans. It also provides information needed to submit an annual [Budget Plan](#) for the first fiscal year of funding.

Unless superseded or rescinded, the goals, objectives, and requirements spelled out in the SGA will apply to all future funding requests and modifications submitted during the 5-year grant period. Therefore, the SGA must be specific enough to ensure grantees meet statutory and policy requirements, but have enough flexibility to allow for differences in state processes, organization structures, population demographics and changing economic conditions.

Even though VETS approves the 5-year State Plan, funding awards are only for one fiscal year as noted above. Therefore, each year, upon receipt of the next fiscal year's funding allocation target, each state must review its State Plan and submit an [Annual Funding Modification Request](#). At a minimum, the request will contain the budget forms needed to request funding, but it may also contain changes to the scope of the State Plan itself. Upon approval, the Annual Funding Request modifies the approved State Plan and is incorporated into the grant file as appropriate.

In addition to the Annual Funding Modification Request, states may submit other requests to modify their approved State Plan throughout the fiscal year. These [interim modifications](#) may be used to request additional funding, move funding between the programs to which funds were awarded, or change the scope of services provided to veterans by the state agency, DVOP specialists and LVER staff.

Each type of grant application or modification is discussed in more detail in the paragraphs that follow. The table below summarizes the documents and forms currently needed for each submission:

	5-Year State Plan	Annual Funding Modification Request	Interim Modification Request
Transmittal Memorandum	Required	Required	Required
State Plan (Narrative)	Required	Amendments Only	Amendments Only
Assurances/Certifications Signature Page	Required	Optional	Optional
SF 424	Required	Required	Required
SF 424A (DVOP)	Required	Required	Optional
SF 424A (LVER)	Required	Required	Optional
Staffing Directory	Required	Required	Optional
TAP Employment Workshop Forecast	Optional	Optional	Optional
Indirect Cost Documentation	Required	Optional	Optional

8.3.1 Transmittal Memorandum

All funding requests must include a Transmittal Memorandum that conveys:

- An assurance that the state will comply with 38 U.S.C., Chapters 41 and 42;
- The number of full-time and half-time DVOP specialists and LVER staff the state has determined can be fully supported by the allocation amount. If there is a difference between the numbers listed in the transmittal memorandum when compared to those listed in the Staffing Directory, the transmittal memorandum will contain an explanation for the difference;
- A brief summary of proposed changes (referenced by the page number of the document being amended) to the approved State Plan;
- An assurance that the Central Services Cost Allocation Plan or Negotiated Indirect Cost Rate is the same used in the most current approved plan, or that the appropriate cost methodology documentation is included; and if applicable;
- A description of any equipment (with a useful life of more than one year and a per-unit cost of \$5,000 or more) that would be purchased if forecast spending is approved; and,
- An indication that the person signing the SF 424 is authorized to enter into agreement with the Department of Labor.

The Transmittal Memorandum must be signed by a person authorized to enter into an agreement with the USDOL. Under normal circumstances, governors delegate this signature authority to the person who manages the grantee agency, i.e. State Agency Administrator, Director, Commissioner, etc. This person may further designate his or her signature authority. If the Transmittal Memorandum is signed by the person given signature authority by the governor, it must contain a statement that the signatory is authorized to enter into an agreement with the USDOL. If it is signed by someone else, a delegation of signature authority must be provided. The Transmittal Memorandum cannot be signed "for" another person unless the name of the person who signed can easily be discerned and a signature delegation for that person is provided.

8.3.2 The Program Plan

The JVSG is a multi-year formula program grant. Annual funding for each state is determined by a formula, described in 8.2.1. In accordance with 38 U.S.C. § 4102A(c) (2) (A):

"A state shall submit to the Secretary an application for a grant or contract under subsection (b) (5). The application shall contain the following information:

- (i)* a plan that describes the manner in which the state shall furnish employment, training, and placement services required under this chapter for the program year, including a description of--

- (I) duties assigned by the state to disabled veterans' outreach program specialists and local veterans' employment representatives consistent with the requirements of sections 4103A and 4104 of this title;
 - (II) the manner in which such specialists and representatives are integrated in the employment service delivery systems in the state; and
 - (III) the program of performance incentive awards described in section 4112 of this title in the state for the program year.
- (ii) The veteran population to be served.
 - (iii) For each employee of the State who is assigned to perform the duties of a disabled veterans' outreach program specialist or a local veterans' employment representative under this chapter –
 - (I) the date on which the employee is so assigned; and
 - (II) whether the employee has satisfactorily completed such training by the National Veterans' Employment and Training Services Institute as the Secretary requires for purposes of paragraph (8).
 - (iv) Such additional information as the Secretary may require to make a determination with respect to awarding a grant or contract to the state."

Typically the [State Plan](#) is a narrative description of the veterans' population that will be served by the grantee or state agency, how priority of service is provided to veterans, performance goals for the state agency and for grant-funded staff, and overall spending forecasts. The State Plan also details the challenges faced by veterans in the State and by the state agency and how those challenges will be addressed. Grantees are expected to develop goals and strategies that are consistent with USDOL performance goals for veterans' employment, retention, and wages.

As described in section 8.2.3., one percent (1%) of the total grant allocation is to be set aside for Performance Incentive Awards. Incentive Award Plans must meet the criteria set forth in the [most current guidance](#) on the subject. Grantees that request Incentive Award funding must submit a plan that meets the criteria set forth in VETS policy guidance and receive approval before selecting awardees or distributing Incentive Awards.

8.3.3 Grant Assurances and Certifications

The Department of Labor will not award a grant or cooperative agreement if the potential grantee fails to accept the required assurances and certifications contained in the SGA. When submitted, the Assurances and Certifications Signature Page must be signed by an authorized signatory as described for the Transmittal Memorandum above. By signing and returning the Signature Page, the state accepts the following:

- Assurances - Non-Construction Programs;

- Certifications Regarding Lobbying, Debarment, Suspension, and Other Responsibility Matters;
- Certifications Regarding Drug-Free/Tobacco-Free Workplace Requirements; and
- Certifications Regarding Release of Information.

The JVSG grantee is required to submit a new [Assurances and Signature Page](#) any time the state agency administering the JVSG changes during the 5-year grant cycle, even if the change is in name only. **Note:** The State Workforce Agency is not necessarily the exclusive agency that operates the Jobs for Veterans State Grant within every state.

This Signature Page is not a delegation of signature authority nor is it required when there is change in designated signature authority(s).

8.3.4 The Annual Budget Plan

The Annual Budget Plan should demonstrate how the JVSG grantee will distribute allocated funding between the DVOP and LVER programs, how many FTE will be funded in each program, and how the allocation will be distributed during the fiscal year. Current versions of all forms that are needed to complete the plan are provided to the states electronically in Microsoft Excel. The [Application for Federal Domestic Assistance, Budget Information – Non-Construction Programs, Staffing Directory](#), and [TAP Employment Workshop Forecast](#) provided contain standardized information and locked cells where no entry of information is needed. Grantees may also be required to submit Indirect Cost documentation from the Division of Cost Determination as part of their Annual Budget Plan.

- The Annual Budget Plan demonstrates the planned use of allocated funding by identifying:
- The number of half-time and full-time DVOP and LVER positions the allocation will support;
- How the allocation will be divided between the DVOP, LVER, and if applicable TAP programs; and
- Whether or not Incentive Award funding is requested.

8.3.4.1 Staffing Directory

The [Staffing Directory](#) provided by VETS contains all staffing information needed by VETS for monitoring and reporting. VETS has initiated the process of submitting this form for OMB approval to meet its statutory responsibility to monitor the scheduling and provision of mandatory NVTI training. While any format may be used to submit staffing information, states must identify:

- All locations where full- and half-time DVOP specialists and LVER staff are assigned as a primary duty location, to include central and sub-state offices, by office name and address;

- All staff, whether funded in whole or in part by the grant, by name, position (DVOP or LVER), and type of appointment (half-time or full-time);
- All staff funded through a Special Initiative or by grant funding to provide functional oversight, regional coordination or other supervisory/managerial responsibilities by name, title, and location;
- Dates of appointment to current position (DVOP or LVER); and
- All vacancies and all positions filled by non-veterans for more than six months.

8.3.4.2 Budget Forms

The [Budget Forms](#) demonstrate how the grantee plans to divide its grant allocation between the two programs and how much of the total funding is needed each Federal fiscal quarter. Cost estimates for DVOP Activities, LVER Activities, TAP, certain DVOP and LVER Special Initiatives, and Incentives will be broken out as either Direct or Indirect. Direct costs are listed by object class category in accordance with instructions provided to complete the form.

OMB Circular A-87, Attachment A, states:

“Direct costs are those that can be identified specifically with a particular final cost objective.”

In the JVSG, direct costs are those that can be directly related to individual DVOP specialist or LVER staff. The Object Class Categories associated with direct costs are:

Personnel: Salaries, wages, and overtime costs forecast for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Fringe Benefits: The costs forecast for fringe benefits provided for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Travel: The costs forecast for program related travel for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Equipment: The costs forecast to purchase non-expendable personal property that has a useful life of more than one year and a per-unit cost of \$5,000 or more. A description and justification for equipment purchases must be included in the state plan

Supplies: The cost forecast for consumable supplies and materials to be used during the project period (including but not limited to computers/laptops and other electrical/electronic equipment) with a per-unit cost of less than \$5,000

Other (Direct): The sum of the separate amounts for:

- Program related staff training;
- Performance Awards and Incentives in accordance with the state Plan (will total up to one percent of the state's combined DVOP and LVER allocation); and
- All other direct costs not clearly covered by the object class categories listed above.

Indirect costs are incurred for common or joint objectives that cannot be readily identified with a particular grant, contract or other activity of the organization. Based on the cost principles established OMB Circular A-87, states support the indirect costs that they incur by submitting an Indirect Cost Rate proposal or a Cost Allocation Plan to the Division of Cost Determination for negotiation and approval.

State agencies use a variety of "bases" to forecast and report indirect charges, e.g. salaries or wages plus fringe benefit costs, total direct costs etc. To ensure fiscal integrity, VETS' GOTRs review indirect charges to ensure they fall within the negotiated rate, or for states with approved Cost Allocation Plans, that they seem reasonable when compared to historical charges.

The Application for Federal Assistance (SF 424) must be completed in accordance with the instructions provided with the form. It must be signed by a proper signatory as described for the Transmittal Memorandum above. The amounts listed on Lines 18a, 18e, and 18g must cross-walk to the Budget Information Forms.

8.3.4.3 TAP Employment Workshop Forecast

State Agencies may request funds to facilitate Transition Assistance Program (TAP) Employment Workshops that are in addition to the annual funding allocation provided by VETS. The number and location of workshops these funds will support will be listed on the [TAP Employment Workshop Forecast](#). VETS will compare the cost per workshop forecast to private contractor costs. If the forecast costs are excessive, further justification will be needed and the funding request may be disapproved.

When the state agency elects to provide facilitators for TAP Employment Workshops, it assumes responsibility for ensuring the staff are properly trained by NVTI and are qualified to conduct effective job search workshops. Facilitators should meet the following criteria:

- Possess good presentation skills;
- Be willing to travel;
- Get along well in individual and group settings;
- Look professional and well groomed; and
- Adjust well to change.

DVETs should coordinate with all responsible partners to schedule workshops, ensure availability of adequate facilities, equipment and materials, and coordinate guest speakers if utilized.

DVOP specialists, LVER staff, and other state employees who conduct TAP Employment Workshops may charge the actual number of hours spent on facilitation to the JVSG, but under no circumstances will the amount charged exceed 24 hours per workshop. States may charge Direct and Indirect Costs to TAP in accordance with the most current [guidance on cost allocation](#).

The hourly costs for state employees who facilitate TAP Employment Workshops should be comparable to what is charged to the JVSG for the same staff person performing other duties, i.e. if a grantee projects a DVOP specialist cost at \$20/hour, the rate when facilitating TAP should be comparable after consideration of reasonable travel and related costs.

In accordance with the requirements of the grant, the same cost entries cannot be recorded in more than one grant activity to avoid duplicate charges. For example, the hours charged for an LVER to facilitate a TAP Employment Workshop must be recorded only as "TAP" costs and may not also be entered as "LVER" costs.

When conducting TAP Employment Workshops, half-time grant-funded staff should charge the number of hours spent facilitating to the TAP time code, not to exceed 24 hours per workshop. The balance of their work week, up to 20 hours, may also be charged to the DVOP or LVER time code as appropriate.

Full-time state employees who facilitate TAP Employment Workshops cannot charge a full 40 hours that week to their normal activity. The time spent (up to 24 hours) facilitating a TAP Employment Workshop is charged to the TAP time code and the remainder to the other program assigned, LVER, DVOP, Wagner-Peyser, etc. The advantage of using full-time staff to facilitate TAP Employment Workshops for the state is the ability to use the funds not charged to the grant to subsidize other grant-funded staff. DVOP specialists who provide disabled transition assistance program or DTAP services do so as part of their normal program responsibilities, although travel funds, like for outreach, may be charged to the JVSG, as necessary.

8.3.5 Special Initiative Requests

IPA assignments that expire after the beginning of the FY for which funding is being requested may be included in Annual Budget Plan. Grant funding may only be requested for the remaining portion of the IPA contract. Applications for all other Special Initiatives may be submitted as a separate modification request in accordance with the most current guidance provided on [interim modifications](#).

8.3.6 GOTR Technical Assistance

The DVET, as the GOTR, should provide technical assistance to the state agency as it develops its State Plan and Annual Budget Plan. Even though the JVSGs are offered non-competitively, grantees must meet and comply with all provisions of

Title 38, Chapters 41 and 42, the General and Special Grant Provisions, OAMB Circular A-87, and all applicable regulations and policies.

DVETs should work closely with their state agencies to help them create State Plans that clearly demonstrate the added value of the DVOP and LVER staff funded by the grant. Because Federal funding for employment programs is limited and becoming more so every year, JVSG grantees must be reminded that their grant is intended to locate those veterans and other eligible persons most in need, provide them with intensive services to become ready for employment, to prepare them for career changes, to market veterans to employers, or to provide job development services that benefit both employers and veterans. The DVET's input could be particularly helpful as the state agency develops certain parts of their plan such as:

- Strategies that best serve veterans needs throughout the state ;
- Optimal staffing plans for offices or regions, especially when resources are limited;
- Plans to target specific categories of veterans such as REALifelines candidates, transitioning incarcerated veterans, homeless veterans and those at risk of becoming homeless, etc.;
- Outreach and out-stationing plans; and
- Employer marketing and outreach strategies.

VETS provides a Review Checklist to assist DVETs and RAVETs as they review draft and final requests submitted by the state agencies. DVETs are encouraged to share the checklist with the state agency early in the process to assist them in preparing the funding request.

The DVET should fully understand the State Plan to ensure the state agency fulfills the requirements for priority service to veterans. Additionally, the state agencies need to understand how the DVETs, serving as GOTRs, will monitor the delivery of these services.

8.3.7 Grant Review

All requests for funding receive three levels of review; the DVET/GOTR, regional or RAVET review, and National JVSG Team Review. DVETs accomplish a detailed review of the draft and final requests after becoming familiar with all instructions provided to the state via VPL and to VETS staff via DM. They complete the Review Checklist and DVET Review Summary provided. Throughout the entire process, DVETs will provide technical assistance as needed to ensure the state agency submits a final request by the due date. After all action items identified for correction and/or explanation have been cleared, the DVET forwards the request to the appropriate RAVET.

Any discrepancy or item noted during the DVET/RAVET review that may require consideration or action by the National Office must be sent forward to the Jobs for

Veterans Lead Center and National Office as soon as discovered. Proposed actions that may warrant special consideration include, but are not limited to:

- A major realignment staffing such as changing all grant-funded staff to DVOP specialists or LVER staff;
- A request to use grant-funded staff to manage resource rooms or other common areas where they would also serve non-veterans; or
- A request to convert large numbers of grant-funded staff to half-time vs. full-time.

RAVETs will review State Plans and forward all electronic and hard copy documents to the Jobs for Veterans Lead Center and National Office as directed in the current guidance.

A National Review Team does the final check on all State Plans. This team typically consists of all members of the Jobs for Veterans Expert Team (JVET, formerly the DVOP/LVER Expert Cluster), the Jobs for Veterans Lead Center and staff from the National Office. The review team completes a final review of the request using the following ground rules:

- Each request is reviewed by two members;
- A member cannot review submissions from states in his/her own region;
- Members must maintain the integrity of the signed original and copies;
- When the review is complete, the original request and all working copies, review checklists, and findings are provided to the team member(s) from the National Office; and
- Team members from the National Office verify team findings and notify the appropriate VETS personnel via email

DVETs and RAVETs are asked to make themselves available the week(s) the National Reviews are completed to answer any questions that might arise and request information or changes from their states agencies as appropriate. Under normal circumstances state agencies are given two weeks to make required changes, provide additional documentation, or provide requested explanations.

8.3.8 Grant Award

After the National Team Review completes their review and prior to October 1st, the Jobs for Veterans Lead Center and National Office finalize the grant packages and prepare them for the Grant Officer. After October 1st and upon enactment of a Department of Labor appropriation, the Grant Officer prepares a Notice of Grant Award package including a transmittal cover page, the first or scope (with approved funding levels) section of the special grant provisions and formal letter that is sent to the authorized official representing each grantee with a copy to the DVET and RAVET. This notice is the formal, legal grant award. Although the grant award

letter approves the multi-year State Plan, it only provides funding for the first fiscal year.

Upon notification that the grant has been awarded, the DVET/GOTR may schedule a post-award conference to review the [General Grant Provisions](#), [Special Grant Provisions](#) and any other terms specified in the Grant Award. The Post Award Conference should be used as a technical assistance tool that can help ensure the effective and efficient conduct of the grant and improve grant outcomes.

In the event an appropriation has not been enacted by October 1st, and the President signs a Continuing Resolution (CR) bill, grantees continue to operate under the previous year's grant award and will be provided enough funding to cover each CR period. They will continue to use the previous year's grant number on all documents and reports until a new Grant Award is executed by the Grant Officer.

In both situations, new grant award and one or more CR periods, the grant office makes funding available for drawdown by the state agencies in the Health and Human Services Payment Management System (HHS/PMS). The HHS/PMS provides a clearinghouse type arrangement with Federal Agencies and their grantees to permit the electronic storage of Federal funds that may be accessed and drawn down remotely by grantees. The Jobs for Veterans Lead Center and National Office provide the funding amounts to the Regional Offices to prepare and distribute the Notice of Obligation Authority (NOA) to grantees. The NOA is sent to the grantee and to the appropriate DVET. It identifies the funding period covered and the amount of funding available for DVOP, DVOP Special Initiatives, LVER, LVER Special Initiatives, and TAP.

8.4 Annual Funding Modifications

Even though VETS approves the grantees' 5-year State Plan, funding awards are only for one fiscal year as noted above. Therefore, each year, upon receipt of the next fiscal year's funding allocation target, each state agency must review its State Plan and submit an [Annual Funding Modification Request](#). DVETs work closely with their state agency as it prepares the Annual Funding Modification Request. The Annual Funding Modification Review Checklist provided to assist DVETs and RAVETs in their review should be shared with each state agency early in the process to assist them in preparing their funding request.

At a minimum, the request will contain the fiscal forms needed to request funding, but it may also contain changes to the scope of the State Plan itself. Upon approval, the annual funding request modifies the approved state plan and is incorporated into the grant file as appropriate.

8.4.1 Transmittal Memorandum

All funding requests must include a Transmittal Memorandum that conveys:

- An assurance that the grantee will continue to comply with 38 U.S.C., Chapters 41 and 42;

- The number of full-time and half-time DVOP specialists and LVER staff the state agency has determined can be fully supported by the annual allocation amount. If there is a difference between the numbers listed in the transmittal memorandum when compared to those listed in the Staffing Directory, the transmittal memorandum will contain an explanation for the difference;
- A brief summary of proposed changes (referenced by the page number of the document being amended) to the approved State Plan or a statement indicating there are no state plan changes;
- An assurance that the Central Services Cost Allocation Plan or Negotiated Indirect Cost Rate is the same used in the most current approved plan, or that the appropriate cost methodology documentation is included in the Annual Funding Modification Request; and, if applicable
- A description of the equipment (with a useful life of more than one year and a per-unit cost of \$5,000 or more) that would be purchased if forecast spending is approved.

The Transmittal Memorandum for the Annual Modification Request must also be signed by a person authorized to enter into an agreement with the USDOL. Under normal circumstances, governors delegate this signature authority to the person who manages the grantee agency, i.e. State Agency Administrator, Director, Commissioner, etc. This person may further designate his or her signature authority. If the Transmittal Memorandum is signed by the person given signature authority by the governor, it must contain a statement that the signatory is authorized to enter into an agreement with the USDOL. If it is signed by someone else, a delegation of signature authority must be included with the funding request. It cannot be signed "for" another person unless the name of the person who signed can easily be discerned and a signature delegation for that person is provided.

8.4.2 Changes to Scope of Approved Plan

States review their JVSG State Plans each year to determine if changes are needed to improve service and outcomes. Information provided in the State Plan narrative must be sufficient to explain and justify all costs forecast in the Annual Budget Plan.

The State Plan should clearly describe the provision of services to veterans, transitioning service members (TSMs) and other eligible persons. Since service delivery strategies may need modification in order to adapt to special client needs or changing labor market conditions, states may amend their plan narratives to reflect any changes to the scope of work or for the addition of new initiatives to serve veterans.

When changes are made to the previously approved State Plan, states should not submit copies of the entire document. Instead, they should provide the language that is being replaced, added, and/or deleted and specifically reference the page number of the most recently approved State Plan that is being changed. If no changes to the plan narrative are needed, the annual JVSG application transmittal memorandum must include a statement to that effect.

The amount allotted for Incentive Awards is equal to one percent (1%) of the annual state grant allocation as calculated by DOL. States may submit Incentive Award Plans for any year during the 5-year grant cycle even if none was submitted in response to the SGA. Approved plans may be amended and submitted for approval as well.

8.4.3 Grant Assurances and Certifications

A new [Assurances and Signature Page](#) is required any time the state agency administering the JVSG changes during the 5-year grant cycle, even if the change is in name only. This Signature Page is not a delegation of signature authority, nor is it required when there is change in designated signature authority(s).

8.4.4 The Annual Budget Plan

The Annual Budget Plan should demonstrate how the grantee will distribute allocated funding between the DVOP and LVER programs, how many FTE will be funded in each program, and how the allocation will be distributed during the fiscal year. Current versions of all forms that are needed to complete the plan are provided to the states electronically in Microsoft Excel. The [Application for Federal Domestic Assistance, Budget Information – Non-Construction Programs](#), [Staffing Directory](#), and [TAP Employment Workshop Forecast](#) provided contain standardized information and locked cells where no entry of information is needed. States may also be required to submit Indirect Cost documentation from the Division of Cost Determination as part of their Annual Budget Plan.

The Annual Budget Plan which may be appended to the transmittal memorandum or separately submitted demonstrates the planned use of allocated funding by identifying:

- The number of half-time and full-time DVOP and LVER positions the allocation will support;
- How the allocation will be divided between the DVOP, LVER, and TAP, if applicable; and
- Whether or not Incentive Award funding is requested.

8.4.4.1 Staffing Directory

The [Staffing Directory](#) format provided by VETS contains cells for all staffing information needed by VETS for monitoring and reporting. VETS has initiated the process of submitting this form for OMB approval to meet its statutory responsibility to monitor the scheduling and provision of mandatory NVTI training for new hires. While any format may be used to submit staffing information, grantees must identify:

- All locations where full- and half-time DVOP specialists and LVER staff are assigned as a primary duty location, to include central and sub-state offices, by office name and address;

- All staff, whether funded in whole or in part by the grant, by name, position (DVOP or LVER), and type of appointment (half-time or full-time);
- All staff funded through a Special Initiative or by grant funding to provide functional oversight, regional coordination or other supervisory/managerial responsibilities by name, title, and location;
- Dates of appointment to current position (DVOP or LVER);
- All vacancies and all positions filled by non-veterans for more than six months.

8.4.4.2 Budget Forms

The [Budget Forms](#) demonstrate how the JVSG grantee plans to divide its grant allocation between the two primary programs and how much of the total funding is needed each Federal fiscal quarter. Cost estimates for DVOP Activities, LVER Activities, TAP, certain DVOP and LVER Special Initiatives, and Incentives will be broken out as either Direct or Indirect. Direct costs are listed by object class category in accordance with instructions provided to complete the form.

OMB Circular A-87, Attachment A, states:

“Direct costs are those that can be identified specifically with a particular final cost objective.”

In the VETS' program, direct costs are those that can be directly related to individual DVOP specialist or LVER staff. The Object Class Categories associated with direct costs are:

Personnel: Salaries, wages, and overtime costs forecast for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff who facilitate TAP Employment Workshops

Fringe Benefits: The costs forecast for fringe benefits provided for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff that facilitate TAP Employment Workshops

Travel: The costs forecast for program related travel for DVOP specialists, LVER staff, staff funded by a Special Initiative, and staff who facilitate TAP Employment Workshops

Equipment: The costs forecast to purchase non-expendable personal property that has a useful life of more than one year and a per-unit cost of \$5,000 or more. A description and justification for equipment purchases must be included in the state plan

Supplies: The cost forecast for consumable supplies and materials to be used during the project period (including but not limited to computers/laptops and other electrical/electronic equipment) with a per-unit cost of less than \$5,000

Other (Direct): The sum of the separate amounts for:

- Program related staff training;
- Performance Awards and Incentives in accordance with the state plan (will total up to one percent of the state agency's combined DVOP and LVER allocation); and
- All other direct costs not clearly covered by the object class categories listed above.

Indirect costs are incurred for common or joint objectives that cannot be readily identified with a particular grant, contract or other activity of the organization. Based on the cost principles established by OMB Circular A-87, states agencies support the indirect costs that they incur by submitting an Indirect Cost Rate proposal or a Cost Allocation Plan to the Division of Cost Determination for negotiation and approval.

States use a variety of "bases" to forecast and report indirect charges, e.g. salaries or wages plus fringe benefit costs, total direct costs etc. To ensure fiscal integrity, VETS' GOTRs review indirect charges to ensure they fall within the negotiated rate, or for state agencies with approved Cost Allocation Plans, that they seem reasonable when compared to historical charges.

The Application for Federal Assistance must be completed in accordance with the instructions provided with the form. It must be signed by a proper signatory as described for the Transmittal Memorandum above. The amounts listed on Lines 18a, 18e, and 18g must cross-walk to the Budget Information Forms.

8.4.4.3 TAP Employment Workshop Forecast

State Agencies may request funds to facilitate TAP Employment Workshops that are in addition to the annual funding allocation provided by VETS. The number and location of workshops these funds will support will be listed on the [TAP Employment Workshop Forecast](#). The TAP Employment Workshop Forecast format provided by VETS contains cells for all necessary information needed for supporting funding requests and DVET monitoring/reporting. VETS has initiated the process of submitting this form for OMB approval to ensure universal use by all JVSG grantees. While currently any format may be used to submit staffing information, grantees must identify location, days and hours by quarter, so that VETS has the basis to compare the cost per workshop forecast to private contractor costs. If the forecast costs are excessive, further justification might be needed or the TAP funding request may be disapproved.

When the state agency elects to provide facilitators for TAP Employment Workshops, it assumes responsibility for ensuring the staff are trained by NVTI and are qualified to conduct effective job search workshops. Facilitators should meet the following criteria:

- Possess good presentation skills;
- Be willing to travel;

- Get along well in individual and group settings;
- Look professional and well groomed; and
- Adjust well to change.

DVETs should coordinate with all responsible partners to schedule workshops, ensure availability of adequate facilities, equipment and materials, and coordinate guest speakers if utilized.

DVOP specialists, LVER staff, and other state employees who conduct TAP Employment Workshops may charge the actual number of hours spent on facilitation to the JVSG, but under no circumstances will the amount charged exceed 24 hours per workshop. States may charge Direct and Indirect Costs to TAP in accordance with the most current [guidance on cost allocation](#).

The hourly costs for state employees who facilitate TAP Employment Workshops should be comparable to what is charged to the JVSG for the same staff person performing other duties, i.e. if a state agency projects a DVOP specialist cost at \$20/hour, the rate when facilitating TAP should be comparable after consideration of reasonable travel and related costs.

In accordance with the requirements of the grant, the same cost entries cannot be recorded in more than one grant activity to avoid duplicate charges. For example, the hours charged for an LVER to facilitate a TAP Employment Workshop must be recorded only as "TAP" costs and may not also be entered as "LVER" costs.

When conducting TAP Employment Workshops, half-time grant-funded staff should charge the number of hours spent facilitating to the TAP time code (or applicable project/activity), not to exceed 24 hours per workshop. The balance of their work week, up to 20 hours, may also be charged to the DVOP or LVER time code (or applicable project/activity) as appropriate.

Full-time state employees who facilitate TAP Employment Workshops cannot charge a full 40 hours that week to their normal activity. The time spent (up to 24 hours) facilitating a TAP Employment Workshop is charged to the TAP time code and the remainder to the other program assigned, LVER, DVOP, Wagner-Peyser, etc. The advantage of using full-time staff to facilitate TAP Employment Workshops for the state agency is the ability to use the funds not charged to the grant to subsidize other grant-funded staff.

State agencies may request additional funding to facilitate TAP Employment Workshops for any year during the 5-year grant cycle even if none was submitted in response to the SGA.

8.4.5 Special Initiative Requests

IPA assignments that expire after the beginning of the FY for which funding is being requested may be included in Annual Budget Plan. Grant funding may only be requested for the remaining portion of the IPA contract. All other applications for

Special Initiatives may be submitted as a separate modification request in accordance with the most current guidance provided on [interim modifications](#).

8.4.6 GOTR Technical Assistance

DVETs should provide technical assistance to the state as they conduct the annual review of the State Plan to ensure it continues to meet all guidelines established in legislation, regulation and policy. States may/should amend their plan narratives to reflect any changes to the scope of work, addition of new programs, or adoption of new initiatives to serve veterans. When changes are made, states should NOT submit copies of the entire plan: they should provide the language that is being replaced, added, and/or deleted and reference the page number of the original document being changed.

A [Modification Review Checklist](#) is provided to assist DVETs (and RAVETs) as they review both draft and final Annual Funding Modification Requests. DVETs should share this checklist with the state early in the process to assist them in preparing the funding request. Additionally, a [DVET Review Summary](#) is provided as a management tool and is to be completed by each DVET to help them determine if the forecast spending for each object class category is reasonable and if the cost per position for grant-funded staff and the cost per TAP workshop (if applicable) are reasonable when considering the impacts of pay raises, increases in the costs of benefits, rescissions in other DOL funded programs, etc.

At any point in the review process, the Annual Funding Modification Request may be returned to the state, via the DVET/GOTR, if there are corrections to be made or issues in need of clarification. To avoid or minimize this possibility, the DVET/GOTR should provide all technical assistance necessary to ensure a complete and accurate application package.

8.4.7 Annual Modification Request Review

All requests for funding receive three levels of review; the DVET/GOTR, RAVET, and National Annual JVSG Modification Team Review. Using guidance provided in an annual [VPL](#) the JVSG grantee submits the annual modification request to the DVET for review and analysis. Using the additional guidance provided in a [DM](#), the DVET submits the application package with his or her recommendation after all action items identified for correction and/or explanation have been cleared.

Any discrepancy or item noted during the DVET/RAVET review that may require consideration or action by the National Office must be sent forward to the Jobs for Veterans Lead Center and National Office as soon as discovered. Proposed actions that may warrant special consideration include but are not limited to:

- A major realignment staffing such as changing all grant-funded staff to DVOP specialists or LVER staff;
- A request to use grant-funded staff to man resource rooms or other common areas where they would serve non-veterans; or

- A request to convert large numbers of grant-funded staff to half-time vs. full-time.

The RAVET reviews the modification request and forwards it to the Jobs for Veterans Lead Center and VETS National Office as directed in the [current guidance](#).

A National Review Team is formed each year to review the annual requests. This team typically consists of all members of the Jobs for Veterans Expert Team (JVET), the Jobs for Veterans Lead Center and staff from the National Office. The review team completes a final review of the request using the following ground rules:

- Each request is reviewed by two members;
- A member cannot review states from his/her own region;
- Members must maintain the integrity of the signed original and copies;
- When the review is complete, the original request and all working copies, review checklists, and findings are provided to the team member(s) from the National Office; and
- Team members from the National Office verify team findings and notify the appropriate VETS personnel via email.

At any point in the review process, it is possible that the JVSG modification request will be returned to the applicant, via the DVET/GOTR, if there are corrections to be made or issues in need of clarification. To avoid or minimize this possibility, the DVET/GOTR should provide all technical assistance necessary to ensure a complete and accurate modification request is prepared prior to, rather than after, the due date for submittal.

DVETs and RAVETs are asked to make themselves available the week(s) the JVSG National Reviews are completed by the JVET to answer any questions that might arise and request information or changes from their states, as appropriate. Under normal circumstances states are given two weeks to make required changes, provide additional documentation, or provide requested explanations.

8.4.8 Annual Funding Modification Approval

After the National Team Review and prior to October 1st each fiscal year, the Jobs for Veterans Lead Center and National Office finalize the grant modification approval packages and prepare them for the Grant Officer. After October 1st and upon enactment of a Department of Labor appropriation, the Grant Officer prepares a Notice of Grant Modification package including a transmittal cover page, modified section and formal letter that is sent to the authorized official representing each grantee with a copy to the DVET and RAVET. This notice is the formal, legal grant award. Although the grant award letter approves the multi-year state plan, it only provides funding for one fiscal year.

Upon notification that the grant has been modified to award additional funds for an additional year, the DVET/GOTR may schedule a post-award conference to review changes and reporting requirements in the [General Grant Provisions](#), [Special Grant](#)

[Provisions](#) and any other terms specified in the Notice of Grant Modification. The Post Award Conference should be used as a technical assistance tool that can help ensure the effective conduct of the grant and improve grant outcomes.

In the event an appropriation has not been enacted by October 1st, and the President signs a Continuing Resolution (CR) bill, grantees continue to operate under the previous year's grant amounts awarded and will be provided enough additional funding prorated to cover the CR period. They will continue to use the old grant number on all documents and reports until a new Grant Award is received.

Under both circumstances, new annual grant modification and CR period allocation, the grant officer makes funding available for drawdown by the states in the HHS/PMS system. The Jobs for Veterans Lead Center and National Office provide the funding amounts to the Regional Offices to prepare and distribute the Notices of Obligation Authority (NOA). The NOA is sent to each grantee and to the appropriate DVET. It identifies the funding period covered and the amount of funding available for DVOP, DVOP Special Initiatives, LVER, LVER Special Initiatives, and TAP.

8.5 *Interim (or Mid-year) Modifications*

During a fiscal year, states may identify a need to amend the scope of their state plan, the number or assignment of DVOP specialists or LVER staff needed to support grant goals or the funding levels that support the staffing levels contained in the approved State Plan. States may also identify a need to request additional funding to support a Special Initiative or respond to exigencies. Any significant changes to the cost, scope, or conditions of a JVSG require Grant Officer (GO/National Office) approval. Therefore, under any of the above circumstances, grantees are required to request a modification via the DVET and RAVET, and must receive approval from the Grant Officer prior to implementing the proposed changes. Grantees should first consult their DVET to determine whether a particular situation requires a modification to their approved State Plan.

In accordance with the [current guidance](#), modifications to the JVSG may be submitted as a completely separate request simultaneously with the annual funding request or at a later date during the FFY. When changes are made to the state plan, grantees should NOT submit copies of the entire plan: they should provide the language that is being replaced, added, and/or deleted and reference the page number of the original document being changed.

All modification requests must be received in the National Office at least forty-five (45) days before the quarter in which the grantee is requesting the changes to become effective. Mid-year modification requests cannot be processed until Annual Funding Modification Requests are processed and signed by the Grant Officer. All requests for additional funding will be held for consideration in the order received, prioritized, and approved if and when funds become available. Grantees must clearly describe all costs associated with the requested modification and the expected quantifiable outcomes. Requests for additional funds will be considered to

cover exigencies such as, but not limited to, national or state disasters, unanticipated fluctuations in state unemployment levels or a need to provide workshops or direct services to large numbers of TSMs. Approval or disapproval will be based on the merit of the request and the availability of funding for reallocation.

8.5.1 Transmittal Memorandum

The transmittal memorandum with original signature of an authorized agency representative should include a clear description of the changes requested in the modification to include intended results, particularly how the targeted category of veterans or TSMs will benefit. It should also include an assurance that all fiscal year funding, including any additional funding received as a result of the approved modification, will be obligated by the December 31st following the end of the current FFY.

Additional funding can be requested to support more than one initiative or project and each request has a different priority when considered for approval. Since each portion of the request will be considered separately based on its merit, need, and availability of funding, the transmittal memorandum must clearly show:

- The amount of the total request that would be used for each purpose; and
- The quarter(s) in which the funds for each purpose would be expended or obligated.

8.5.2 Changes to Scope of Approved Plan

Once a state plan has been approved by the Grant Officer, the terms of the Plan are to be followed. Those terms include the numbers of DVOP specialists and LVER staff employed, assigned physical locations of grant-funded staff, number of other individuals such as the Veterans' Coordinator that may directly charge time to the grant, approved training conferences, etc. If at any time during the fiscal year the grantee desires to deviate from the approved plan, an interim modification request is necessary. This includes changes to the approved state plan that may not require any fiscal changes (i.e. no-cost modification requests).

8.5.2.1 Requests for Additional Funding

Grantees may, at any time, request additional funding from VETS through an interim modification request. Additional funding can be requested for a number of different purposes such as training conferences, increased staff costs for approved levels of DVOP specialists and LVER staff, increased numbers of DVOP specialists or LVER staff to respond to exigencies, Special Initiatives, or to make Incentive Award funds available when not previously requested.

Grantees may request funding for Special Initiatives - unique or innovative proposals for programs or services for veterans. Special Initiative funding covers a specified period of time with no expectation that it will be continued or re-approved for subsequent timeframes. Funding for Special Initiatives is in addition to that

provided in the annual allocation. DVETs will provide necessary technical assistance to state agencies in the development of any Special Initiative proposal. Assignment of state personnel to temporary federal positions under the IPA for VETS program purposes are also funded as Special Initiatives.

Special Initiatives are requested as stand-alone modifications to the state plan and must:

- Demonstrate and describe the scope of the program;
- Provide an evaluation of the need and benefit of the proposed services and planned activities; and
- Indicate the expected quantifiable outcomes (or return on investment) of the proposal to show the initiative is financially responsible.

When a DVET/GOTR receives a modification request for additional funding, he or she should review the request using the [current guidance](#) provided to ensure completeness, accuracy, feasibility, and adherence to policy and guidance. Any errors or omissions noted by the DVET should be corrected before the request is forwarded to the RAVET.

After a thorough review of the modification request in accordance with the most recently issued review guidance, the DVET/GOTR should provide an analysis of the request. The analysis should clearly identify the objectives of the modification request and should identify the costs of those objectives. Using this analysis, the DVET should make a written recommendation to the RAVET as to whether or not the request should be approved. The recommendation should be clearly supported by the analysis.

RAVETs will review annual funding requests, identify whether or not they concur with the DVET's recommendation and forward all electronic and hard copy documents to the Jobs for Veterans Lead Center and National Office as directed in the current guidance.

8.5.2.2 Requests to Shift Funding

Employment conditions may change during the year and the state may need to change their plan narrative to accommodate those changes and meet the needs of the state's veterans. A grantee could find that a reduction in LVER staff and an increase in DVOP staff (or vice versa) may better suit the climate of the employment needs of the veterans being seen in local offices or areas. In order to accomplish this, the state must submit an interim modification request and wait for approval from the Grant Officer before initiating the change. Although the request may seem insignificant, VETS must have the opportunity to review the proposed change and either concur or disapprove the requested changes.

If the changes are approved by the Grant Officer, an NOA will be issued to the grantee to reflect the decrease of funds in one program and equal increase in the other. At that time funds available for drawdown in the HHS/PMS will also reflect the revised totals for each program.

8.5.2.3 Non-Funding Based Requests

Not all interim modification requests involve funding. Some modification requests relate to how the grantee intends to deliver services to veterans, grant-funded staff office locations, changes in the primary duties of grant-funded staff (i.e. out-stationing to VA VR&E), or other cost-neutral actions. Although JVSG funds may not be impacted by such proposals, it is still necessary for the grantee to submit an interim modification request to receive approval and effect the change.

DVET/GOTRs will review the cost-neutral modification requests in the same way as other requests involving the addition or transfer of grant funds. However, the emphasis of the review shifts to the expected positive outcomes expected by the changes. As in the case with other modification requests, VETS staff at the state and region will provide an analysis and recommendation for approval or disapproval to the Jobs for Veterans Lead Center and National Office.

8.5.3 Grant Assurances and Certifications

The grantee is required to submit a new [Assurances and Signature Page](#) any time the state agency administering the JVSG changes during the 5-year grant cycle, even if the change is in name only. This Signature Page is not a delegation of signature authority nor is it required when there is change in designated signature authority(s).

8.5.4 Revised Budget Plan

If the interim modification request affects the approved Budget Plan, a revision must be submitted that demonstrates how the grantee will distribute the revised funding between the DVOP and LVER programs, how many FTE will be funded in each program, and how the allocation will be distributed during the remainder of the fiscal year. Current versions of all forms that are needed to complete the plan are provided to the grantees electronically in Microsoft Excel. The [Application for Federal Domestic Assistance, Budget Information – Non-Construction Programs, Staffing Directory](#), and [TAP Employment Workshop Forecast](#) provided contain standardized information and locked cells wherever information entry is unnecessary. States may also be required to submit Indirect Cost documentation from the Division of Cost Determination as part of their Annual Budget Plan.

The revised Budget Plan demonstrates the planned use of allocated funding by identifying:

- The number of half-time and full-time DVOP and LVER positions the allocation will support;
- How the allocation will be divided between the DVOP, LVER, and if applicable TAP programs; and
- Whether or not Incentive Award funding is requested.

8.5.4.1 Staffing Directory

An updated [Staffing Directory](#) is required only if the grantee is requesting funding for additional staff, reassigning staff between the DVOP and LVER programs, or reassigning staff to locations other than where listed in the Annual Funding Modification or most current approved State Plan.

The Staffing Directory provided by VETS contains all staffing information needed by VETS for monitoring and reporting. VETS has initiated the process of submitting this form for OMB approval to meet its statutory responsibility to monitor the scheduling and provision of mandatory NVTI training for new hires. While any format may be used to submit staffing information, grantees must identify:

- All locations where full- and half-time DVOP specialists and LVER staff are assigned as a primary duty location, to include central and sub-state offices, by office name and address;
- All staff, whether funded in whole or in part by the grant, by name, position (DVOP or LVER), and type of appointment (half-time or full-time);
- All staff funded through a Special Initiative or by grant funding to provide functional oversight, regional coordination or other supervisory/managerial responsibilities by name, title, and location;
- Dates of appointment to current position (DVOP or LVER);
- All vacancies and all positions filled by non-veterans for more than six months.

8.5.4.2 Budget Forms

The [Budget Forms](#) demonstrate how the grantee proposes to divide the revised funding amount between the two primary grant programs and how much of the total funding is needed for each remaining Federal fiscal quarter. Cost estimates for DVOP Activities, LVER Activities, TAP, certain DVOP and LVER Special Initiatives, and Incentives will be broken out as either Direct or Indirect. Direct costs are listed by object class category in accordance with instructions provided to complete the form.

The Application for Federal Assistance must be completed in accordance with the instructions provided with the form. It must be signed by a proper signatory as described for the Transmittal Memorandum above. The amounts listed on Lines 18a, 18e, and 18g must cross-walk to the Budget Information Forms.

8.5.4.3 TAP Employment Workshop Forecast

States may request additional funding to facilitate TAP Employment Workshops for any year during the 5-year grant cycle, even if none was submitted in response to the SGA. The [TAP Employment Workshop Forecast](#) must be included in an interim modification request only if the state is requesting changes to the most current, approved number and/or scope of TAP Employment Workshops. The TAP Employment Workshop Forecast format provided by VETS contains cells for all

necessary information needed for supporting funding requests and DVET monitoring/reporting. VETS has initiated the process of submitting this form for OMB approval to ensure universal use by all JVSG grantees. While currently any format may be used to submit staffing information, grantees must identify location, days and hours by quarter; so that VETS has the basis to favorably consider any proposed changes, which must also meet the requirements spelled out in the most current guidance on requesting TAP funding.

8.6 Performance Measures and Negotiating Goals

8.6.1 Legislation

Title 38 United States Code, Section 4102A (38 U.S.C. 4102A)

8.6.2 Other References

[ET 406 Handbook](#), expiration date February 28, 2009;

[VPL 04-09](#), Negotiating Performance Goals for PY 2009, June 5, 2009;

[TEGL 09-08](#), Negotiating Performance Goals for the Workforce Investment Act Title IB Programs and Wagner-Peyser Act Funded Activities for Program Year 2009; and

[TEGL 17-05](#), Common Measures Policy for the Employment and Training Administration (ETA) Performance Accountability System and Related Performance Issues, dated February 17, 2006.

8.6.3 ET Handbook 406

The [ET 406 Handbook](#) details the data collection and reporting process to support labor exchange performance measurement within the context of partner program performance measurement systems. The five handbook sections comprising the ETA 9002 reporting instructions are divided into three distinct areas:

- Services (ETA 9002 A and B);
- Outcomes (ETA 9002 C and D); and
- Job Openings Received (ETA 9002 E).

Reporting requirements for employment services and performance outcomes of the state -administered, federally-funded Wagner-Peyser Act program are contained in this Handbook. Data reported on the ETA 9002 A, 9002 B, 9002 C, 9002 D, and 9002 E reports plus the VETS 200A, 200B, and 200C reports are comprised of information entered by each JVSG grantee from its management information system, which contains job seeker characteristics and services and records of work applications and job orders. Additionally, data is obtained through matching information on job seekers with employment outcome information obtained from unemployment insurance (UI) wage records, the state Directory of New Hires (SDNH) database, or other automated sources.

Appendices A, B and C of the ETA 406 Handbook contain the report formats, data element specifications, and report calculation specifications needed to prepare these reports.

8.6.4 ETA 9002 Reports

Wagner-Peyser Act funded services are reported on the ETA 9002A for all participants and on the 9002B for participants who are veterans, eligible persons, or TSMs. The ETA 9002C and D follow this sequence by separately capturing the employment outcomes resulting from the provision of employment services for all individuals who exit from Wagner-Peyser (ETA 9002 C) and exiters who are veterans, eligible persons, or TSMs (ETA 9002 D).

8.6.5 VETS 200 Reports

The VETS 200 Reports are a subset of the ETA 9002 reports data. The data reported contain similar elements as the ETA 9002, but only apply to the activities of participants who received one or more services from DVOP specialists and/or LVER staff. This enables VETS to evaluate the outcomes of the more intensive services offered to participants under these two programs. The VETS 200 reports are the:

- VETS 200A, Services/Outcomes by DVOP specialists;
- VETS 200B, Services/Outcomes by LVER staff; and
- VETS 200C, Unduplicated Count of Services/Outcomes Provided by DVOP/LVER staff.

8.6.6 Common Measures

As mandated by 38 U.S.C. 4102A, the ASVET has established and implemented a performance accountability system to measure the effectiveness of services provided to veterans by the One-Stop Career Center System. Current guidance quantifies the effectiveness of the state agency's employment delivery system in meeting the needs of veterans, TSMs and other eligible persons seeking employment. To fulfill its statutory monitoring and oversight role, VETS issues [guidance](#) that establishes national goals that reflect high, positive employment outcomes for veterans and are achievable by the cumulative efforts of the state grantees. There is an expectation that state agencies will set goals high enough to be challenging and to contribute to the National goals, but still achievable. If a state agency falls short of their negotiated goals, VETS is legally obligated to take action to remedy the situation.

8.6.6.1 Public Labor Exchange Measure

States are expected to use the performance accountability system to develop strategies and policies that demonstrate continuous improvement. The following performance goals will be negotiated with the State Workforce Agency for One-

Stop/Labor Exchange employment and workforce information services delivered to veterans:

- Veterans' Entered Employment Rate (EER)
- Veterans' Employment Retention Rate (ERR)
- Veterans' Average Earnings (AE)
- Disabled Veterans' EER
- Disabled Veterans' ERR
- Disabled Veterans AE

8.6.6.2 Grant-Based Measures

The following seven performance goals for veterans served by DVOP specialists and LVER staff are also be negotiated with the appropriate state agency/grantee:

DVOP:

- Disabled Veterans' EER (following Staff Assisted Services)
- Disabled Veterans' ERR

LVER:

- Recently Separated Veterans' EER (following Staff Assisted Services)
- Recently Separated Veterans' ERR

DVOP/LVER Consolidated

- Veterans' EER (Weighted)
- Veterans' ERR
- Veterans' AE

8.6.7 Negotiating Goals with State Agency(s)

Performance accountability is a key component of the information system used to manage the efficacy of the workforce investment system. State agencies should use the negotiation of goals as an opportunity to encourage innovation that shows continuous improvement in the provision of services to veterans, TSMs, and other eligible persons.

Negotiation for the six One-Stop goals can be based on comparable, historical data reported by the state agencies on the ETA 9002D Quarterly Report on Performance Outcomes for Veterans, Eligible Persons and TSMs, as well as how those outcomes compare to the National performance goals for the appropriate PY. Performance levels for each of the six outcomes will be negotiated separately. For any proposed outcome that is less than the National goal, negotiations should strive to set a goal

that shows as much positive improvement toward meeting the national targets as possible. For reported outcomes that already exceed the national targets, negotiations should be geared toward positive improvement that will enhance the potential for collectively attaining the national goals.

Negotiation of the two outcomes for DVOP specialists will be based on the historical performance data reported by the grantee on the VETS 200A DVOP Quarterly Report. Negotiation of the two outcomes for LVER will be based on the historical data reported by the grantee on the VETS 200B LVER Quarterly Report for the same periods. Negotiation of the three consolidated outcomes for DVOP/LVER will also be based on the historical data reported by the grantee on the VETS 200C for the same periods. Each of the seven grant-based outcomes listed above will be negotiated separately. Negotiations should strive for target outcome rates that demonstrate positive improvement above what was reported for the previous annual 12 month period.

8.6.7.1 Coordination with ETA Negotiations

State agencies may negotiate performance goals with the DVETs at the same time they are negotiating performance goals for a variety of USDOL programs with their ETA Federal Project Officers (FPOs). RAVETs are encouraged to meet with their counterparts from ETA to encourage joint or collaborative negotiations between DVETs and assigned FPOs with their respective State Agencies. Geographic location of the DVETs and FPOs may affect the level of cooperative effort that is achievable. However, collaborative negotiations can be useful for the states in reducing a duplication of effort, but also useful for the DVETs and FPOs in eliciting a consistency of expectations across USDOL grants programs. DVETs should be aware of [ETA's most current guidance](#) to the states regarding performance negotiations. This guidance may include an explanation of ETA's methodology for assessing performance against negotiated goals which differs from that of VETS. For example, in the most recent [TEGL](#), ETA advised states that its assessment methodology would include criteria for exceeding, meeting or failing to meet performance goals based on certain percentages of achievement. In this ETA methodology, a state will be considered to have met a performance goal if the actual performance achieved falls in the range of 80-100% of the negotiated level of performance for the measure. Since VETS has not adopted a similar methodology, state agencies may tend to be more conservative in the performance goals they set for service to veterans than they would be in other USDOL grant programs administered by ETA.

8.6.7.2 How to Negotiate Goals

The process for negotiating performance goals generally begins in April of each year when VETS issues a VPL promulgating guidance to the state agencies. The state agencies will be advised to submit proposed performance levels to the DVETs in accordance with a [set format](#) outlined in the [current VPL](#). State Agencies are expected to meet with the respective DVET to negotiate the performance goals. Historical performance data, current labor market information and demographic

factors play a key role in developing performance goals. Examples of economic and demographic factors that should be considered when negotiating outcomes are:

- Employment opportunities as affected by the rate of job creation/job loss in the state;
- Trends in state and sub-state unemployment;
- The number of demobilizing National Guard and Reservists in the state; and
- The availability of shared wage records used to report entered employment and retention outcomes.

State Agencies should conduct a thorough analysis of the outcomes reported to date for the current program year and all factors that may impact future performance prior to entering into negotiations with the DVET. DVETs should work closely with their JVSG grantee to develop and implement new strategies if the outcomes for One-Stop services for veterans are not meeting the national targets, or if the grant-based outcomes for services provided by DVOP specialists and/or LVER staff are below 50%. In those cases, negotiations should include a discussion various factors that may impact outcomes such as:

- Grant-funded staff utilization rates;
- Targeting services to areas of high unemployment;
- Employer outreach;
- Job development; and
- Staff training, etc.

Any state agency that does not meet one or more of its negotiated goals for a given program year will be required to work closely with the respective DVET during the following twelve months to improve outcomes. During this period of technical assistance, the DVET will be instrumental in assisting the state with exploration of the problems or issues that impact the shortfall, and in recommending improvements designed to improve the state agency's capacity to meet its goals. If needed, a second year of technical assistance can be provided to ensure that the state agency achieves outcomes that are reflective of its economy and that contribute to the National goals. If the deficiency continues at the end of the second year of technical assistance, the DVET, in consultation with the appropriate RAVET, may place the state agency under a Corrective Action Plan (CAP.)

8.6.7.3 Submitting Negotiated Goals

Prior to the date established in the current VPL, State Agencies will submit the proposed performance goal to the respective DVET. State Agencies are encouraged to use the [format](#) provided by VETS to submit their goals. If an alternative format is submitted, it must include the same information listed in the two tables and must be signed by an approved state signatory(s) if not on agency letterhead.

Once the state agency/JVSG grantee and the DVET reach agreement, the DVET will forward a signed copy of the agreed performance levels to the RAVET for review. If the proposed goals are unacceptable, the RAVET may direct the continuation of the negotiation process until mutual agreement is reached. No later than June 30th of each year, RAVETs will indicate their approval by submitting the final, negotiated performance goals for each state agency, signed by the DVET and the RAVET, to the Jobs for Veterans Lead Center and the National Office. Each signed memorandum will be incorporated into the respective state agency's/JVSG grantee's approved plan for services to veterans.

8.7 *Recurring Reports*

The Special Grant Provisions for Jobs for Veterans Grants outline the performance measures for which the state agencies will be held accountable as part of the JVSG. Grantees are expected to collect, maintain and submit valid, verifiable data that reflect the accomplished activities and expenditure of grant funds. The DVET/GOTR is authorized to review reports and records, monitor progress of the grant, and otherwise make recommendations to the Grant Officer on all grant matters and requests. In accepting the JVSG, the grantee agrees to give the DVET/GOTR access to all grant reports and state records relative to the provision of employment, education and training-related services to veterans, other eligible persons and TSMs.

The [VPL](#) and [DM](#) on recurring reports provide current information on report contents, due dates and distribution. The DVET/GOTR, then, must be familiar with the various reports, records and processes to effectively execute his/her oversight duties and evaluate the grantee's performance in providing veterans' employment and training services as stipulated in the grant.

These quarterly reports are reviewed and carefully analyzed by the DVET prior to forwarding to the regional office for their review and submission to the National Office, and Jobs for Veterans Lead Center (See sections 8.8 Fiscal Analysis and 8.9 Evaluating and Improving Performance for detailed information). DVETs are encouraged to schedule quarterly meetings with the State Agency to review their reported obligations and performance outcomes. Open discussions will increase the likelihood that the grantee will complete the year on target with their spending and outcome goals and will promote continuous improvement over current levels of performance.

8.7.1 Quarterly Report (Quarters 1 – 4)

To fulfill legislatively mandated grant oversight and management responsibilities, VETS requires grantees to submit fiscal and activity/performance reports on a quarterly basis during the four quarters of each grant year and additional financial reports for any unobligated JVSG funds carried over into a "fifth" FY quarter and expended by or before March 30th of the following fiscal year.

8.7.1.1 Report Requirements

In accordance with the [current recurring report guidance](#), the following reports are required:

- Technical Performance Narrative (TPN)
- Financial Report
 - Federal Financial Report (DVOP)
 - Federal Financial Report (LVER)
 - Expenditure Detail Report (EDR) (or alternate format)
- Quarterly Program Activity and Outcome Reports
 - ETA 9002A - Services To Participants
 - ETA 9002B - Services To Veterans, Eligible Persons and TSMs
 - ETA 9002C - Performance Outcomes-All Exiters
 - ETA 9002D - Performance Outcomes-Veterans, Eligible Persons and TSM Exiters Only
 - VETS 200A - Services/Outcomes by DVOP Staff
 - VETS 200B - Services/Outcomes by LVER Staff
 - VETS 200C - Unduplicated Counts of Services/Outcomes provided by DVOP/LVER Staff
- DVOP/LVER Staffing Directory
- Vocational Rehabilitation & Employment (VR&E) Report
- DVET Technical Performance Analysis Report (TPAR)

States must submit their reports no later than 45 days after the end of each Federal fiscal quarter. Sometime after the end of the 4th Quarter, grantees must submit a Final Fiscal Report for both the DVOP and LVER programs. When authorized by the annual DOL appropriation, grantees may carry over unobligated funds into a "5th Quarter", in which case Final Fiscal Reports would be required NLT 45 days after period ending December 31st. Final fiscal reports are submitted after all obligations have been liquidated for each program; i.e., if all DVOP funds are expended at end of 4th Quarter, that quarter's report (submitted NLT November 14th) can be marked "Final" or a separate Final Fiscal Report for the DVOP Program can be submitted NLT February 14th. LVER funds carried into a "5th Quarter" would require a separate Final Fiscal Report NLT May 15th.

8.7.1.2 Manager's Quarterly Report on Services to Veterans

38 U.S.C. §4104 requires, "Each local veterans' employment representative shall be administratively responsible to the manager of the employment service delivery

system and shall provide reports, not less frequently than quarterly, to the manager of such office and to the Director for Veterans' Employment and Training for the state regarding compliance with Federal law and regulations with respect to special services and priorities for eligible veterans and eligible persons." The Manager's Quarterly Report on Services to Veterans was developed to meet this requirement by providing a snapshot of veterans' services at the local office or regional level. The [VPL](#) on Roles and Responsibilities (of grant-funded staff) provides detailed information on the report. The following is a list of required content for this report:

- Time period and physical area/location covered by the report;
- Report author;
- Chapter 31 (VR&E) Activity; and
- Report narrative:
 - Explanation of One-Stop processes;
 - Outreach ; and
 - Additional comments.

The following is a list of suggested content for this report:

- Success stories / Best practices;
- Special projects; and
- Other LVER activities.

8.7.1.3 TAP Report

DVETs report information on all TAP sites within their state each quarter. The data needed for each workshop is the same regardless of who facilitates the workshop:

- State
- Installation's Branch of Service
- Military Installation Name
- Number of Workshops
- Number of Retiring Participants
- Number of Separating Participants
- Number of Spouse Participants
- Number of Participants from each branch of service
- Number of Participants within 90 days of separation

- Number of Participants more than 90 days from separation
- Number of Workshops facilitated by grant-funded staff
- Number of Workshops facilitated by VETS staff
- Number of Workshops facilitated by Contractors
- Number of Workshops facilitated by WAE employees (when actually employed)

This information may come from a variety of resources as determined by local policy, e.g. TAP Site Manager, TAP Workshop facilitator, State Veterans' Program Coordinator, etc. The data is entered onto a spreadsheet for Regional and National rollup or entered into an automated reporting system. Currently:

The DVET or designated representative:

- Validates and enters TAP data for all Employment Workshop activity accomplished during the quarter being reported into a standard spreadsheet provided by the VETS National Office TAP Lead; and
- Forwards the completed spreadsheet to the Regional Administrator with the grantee's quarterly report.

The Regional Administrator or designated representative:

- Consolidates all state TAP data into one Regional spreadsheet;
- Ensures the accurate and timely reporting of the submitted data/information; and
- Consolidates and forwards the Region's report to the National Office with the grantees' quarterly report.

The National Office collects and consolidates the Region reports.

8.7.2 'Fifth' Quarter Fiscal Report

The 'fifth' fiscal year quarter is simply a period of time congruent with the first quarter of the subsequent fiscal year in which a grantee can still spend or obligate retained surplus funds remaining from the fourth quarter of the previous FY. This carry-over of unobligated fourth quarter funds is generally used by the grantee to maintain continuity in the JVSG during the transition from one fiscal year to the next.

8.7.2.1 FIFO Principles

The definition of "first-in, first out" (FIFO) is just as the term appears to suggest. Grantees must use the "oldest" available grant funds first before utilizing "newly allocated" funds. This concept is most critical during the fifth quarter to ensure grantees obligate funds from the previous fiscal year prior to utilizing funds from the current fiscal year.

The FIFO principle is exemplified as follows. A grantee has \$5,000 of surplus funds in the LVER program at the end of the fourth quarter, asks the RAVET (through the DVET) to retain the funds to offset staff costs in the next quarter, and is approved by the RAVET to do so. Although the grantee receives its entire first quarter allocation for LVER, it must obligate the \$5,000 from the previous fiscal year prior to utilizing any of the new funds. Once the \$5,000 is obligated, the state can then begin obligating first quarter funds.

8.7.2.2 Report Requirements

Since spending is reported in the same fiscal year as the funding is provided, "fifth quarter" obligations must be reported separately from any first quarter obligations, even though the funds may go for the same purpose during the same period of time. The 'fifth' quarterly report is a fiscal report on obligations of the surplus funding only; performance reported for the timeframe is attributed to the 1st quarter report (following FY). The 'Fifth' Quarter Report will contain:

- Technical Performance Narrative (TPN)
- Financial Report
 - Federal Financial Report (DVOP) (if surplus funding was obligated)
 - Federal Financial Report (LVER) (if surplus funding was obligated)
 - Expenditure Detail Report (EDR) (or alternate format)

The following examples depict what documents are required for different 5th quarter scenarios:

Scenario 1:

The JVSG grantee fully obligates all DVOP and LVER funds as reported on the fourth quarter report; all DVOP obligations were reported as liquidated while a portion of the LVER obligations were unliquidated.

The grantee would be required to submit a fifth quarter report containing a TPN, Federal Financial Report (LVER) and EDR if the obligations are liquidated before December 31st.

Scenario 2:

The grantee expends all LVER funds in the fourth quarter and marks the corresponding Federal Financial Report (LVER) as "Final." The fourth quarter Federal Financial Report (DVOP) shows an unobligated balance of \$12,000.

The grantee would be required to submit a 5th quarter report containing a TPN, Federal Financial Report (DVOP) and EDR.

Scenario 3:

The grantee reports an unobligated balance for both DVOP and LVER at the end of the fourth quarter.

The grantee must submit fifth quarter reports for both DVOP and LVER – A TPN, Federal Financial Report (DVOP), Federal Financial Report (LVER), and EDR. All funds from both programs must be fully obligated by the end of the fifth quarter. If funds are obligated but not liquidated by the end of the 5th quarter, those funds must be reported as liquidated the following quarter (ending March 31, 20XX). Any remaining funds not liquidated will be returned to Treasury.

8.7.3 TPAR

The DVET will thoroughly review and analyze all reports and related documents provided by the grantee, including the Annual Incentive Awards Summary Report. The DVET review is critical to ensuring that:

- Funds are expended in accordance with the approved fiscal plan;
- A plan has been developed by the grantee to make up for deficiencies before the end of the fiscal year, whenever the grantee is over-expended in any funding source, i.e. Special Initiatives, TAP or DVOP/LVER Activities;
- A detailed, approvable plan has been developed by the grantee to spend all allocated funds before the end of the funding period (4th quarter or when authorized the 5th quarter) or wishes to have the excess funds reallocated when under-expended in any program;
- Outlays are allocated between Direct and Indirect object class categories in accordance with the approved state plan;
- A good faith effort is taken to fill vacancies in a timely manner with qualified veterans in accordance with statutory priorities;
- Good progress is being made toward meeting the grantee's negotiated performance measures;
- DVOP specialists and LVER staff are fulfilling the separate and distinct statutory roles and responsibilities and operate in accordance with current policy guidance;
- DVOP specialists and LVER staff are only serving veterans and other eligible persons when charging to the JVSG;
- DVOP specialists and LVER staff are fully and effectively integrated into the One-Stop system;
- Priority of service is provided to eligible veterans in all Department of Labor funded employment and training programs;
- VR&E clients are served by a DVOP specialist or LVER staff when referred by the Department of Veterans' Affairs;
- The cost for grant-funded staff to facilitate TAP Employment Workshops is in line with the state plan and cost effective for VETS; and

- Issues, problems, best practices, and success stories that may have an impact on the quality of services provided to veterans are identified by the grantee in the TPN.

While not a comprehensive list, analysis of the State's Quarterly Report will require the DVET to complete such actions (see sections 8.8 Fiscal Analysis and 8.9 Evaluating and Improving Performance for more detailed information) as are necessary to:

- Verify that the outlays and obligations reported on the previous quarter's fiscal report have not changed;
- Verify that costs reported on the EDR are rolled up on the appropriate Federal Financial Report;
- Verify that calculated expenditures, such as those reported in "Cumulative" column are correctly reported on all financial forms;
- Calculate the staff utilization rate (percentage of planned positions filled) by comparing the Staffing Directory to the State Plan;
- Identify newly assigned grant-funded staff and those no longer paid by the grant;
- Calculate the average cost per position for each funding source by dividing the cumulative amount expended in each funding source by the Base Positions Paid by that funding source;
- Calculate the average cost per TAP Employment Workshop (when applicable) by dividing the cumulative amount expended on TAP by the total number of workshops facilitated by grant funded staff;
- Analyze the percentage of services to non-veterans by DVOP and LVER staff reported on performance reports;
- Analyze services to veterans as they compare to services to non-veterans; and
- Compare the Entered Employment Rate and Employment Retention Rates to negotiated goals and account for variances.

The DVET will submit a TPAR that addresses the issues listed above for the 1st, 2nd, 3rd, and 4th quarters. The TPAR should include information on any other problems or issues that are relevant. When problems are identified, the TPAR should describe actions being taken to address them.

Carry-in funds are used to supplement or supplant first quarter funds in accordance a RAVET approved fifth quarter spending plan. Therefore, no analysis is needed regarding staff utilization, cost per position, cost per TAP workshop or performance. Therefore, when funds are expended in the 5th Quarter, the DVET needs to prepare and submit a transmittal memorandum that identifies the amount of any funds obligated to be liquidated in the "final" quarter, or any funds left un-obligated.

After P.L. 109-461 was enacted requiring DVOP specialists and LVER staff to complete specialized training with NVTI, grantees were required to provide the names of all DVOP specialists and LVER staff on their Staffing Directory, provide the dates appointed to their current position, and identify whether or not each had completed the mandatory "core" training. This information was used to create a National database of grant-funded staff that is now maintained and updated by NVTI to forecast future training class requirements. To keep the database current, DVETs are required to compare each new Staffing Directory to the one previously submitted and provide information on staffing changes. This includes all staff persons whose date of appointment to their current position falls within the report quarter and those staff no longer paid by the grant due to relocation, reassignment, retirement etc. The Staffing Directory for each subsequent quarter will also be compared to the one submitted in the prior quarter. When grant-funded LVER staff are reassigned to DVOP specialist positions, and vice versa, they should be considered "Newly Assigned" to their current position and "No Longer" in their previous position on the Staff Directory and in the DVET's written comparison.

8.7.4 Final Fiscal Report

Once a grantee has either expended all of its grant funds, or the authorized time to spend grant funds has expired (March 31, 20XX of subsequent fiscal year), a Final fiscal report must be submitted to reconcile funds received for that fiscal year. The Federal fiscal year commences on October 1st each year and is concluded on September 30th of the following year. However, due to the appropriation law's fifth quarter spending authority, grantees have an additional quarter to spend or obligate remaining grant funds from the concluded year, and an additional quarter (January 1st through March 31st) to liquidate all funds that were obligated by the end of the fifth quarter (December 31st). Once all funds are liquidated, but not later than May 15th following the conclusion of a fiscal year, grantees must submit the Final fiscal year reports.

Each final fiscal report must be marked as "Final" on the appropriate Federal Financial Report form. This annotation makes it clear that this is the final accounting for the grant and allows necessary actions to be taken to reconcile any funds remaining in the grant account. Once this final report is received, VETS will know how much of the last FY's funds remained unspent and will be deobligated and revert back to the Treasury.

8.7.5 Reallocation Recommendations (Quarters 1 – 4)

In the event a grantee has not fully expended or obligated to expend all grant funds by the end of each Federal fiscal quarter, the grantee must report those unobligated funds on its Federal Financial Report for the quarter. These funds may then be identified for reallocation by VETS. Being subject to reallocation means that they may or may not be reallocated at a later date in the current fiscal year. When a reallocation occurs, a subsequent quarterly allocation would be reduced by a like amount.

The DVET's comprehensive financial analysis of the DVOP or LVER grant funds is used to make a sound recommendation to the RAVET about what should be done with unobligated funds. Before making a reallocation recommendation the DVET should consider:

- The explanation of why there is are surplus funds;
- The grantee's identification of known future expenses and exigencies that could directly support their need to retain some unobligated or unexpended grant funds; and
- Whether or not the grantee's plan to use some or all of those excess funds is acceptable.

The DVET/GOTR must provide the RAVET separate recommendations to reallocate DVOP or LVER funds or not when surpluses exist in both programs. Great care should be taken to ensure that the grantee is not asking to exempt funds in order to accomplish things that might change the scope of the grant. If that is the case, the DVET/GOTR should advise the grantee to submit a modification request to retain and utilize the surplus funds for that reason. All recommendations regarding surplus funds should:

- Identify any funds that should be reallocated;
- Identify any funds that should be exempted from reallocation; and
- Include a detailed explanation for the reallocation or exemption.

The DVET/GOTR's recommendation in support of or against reallocation of JVSG funds should be clearly explained in the quarterly report's TPAR. The recommendation should be made to the RAVET and provide him or her with sufficient details to make an informed recommendation to the VETS National Office and the Jobs for Veterans Lead Center. The RAVET recommendation is made in the Regional Rollup of reports and will provide evidence in support of his or her recommendation.

8.7.6 Distribution of Reports

Report distribution is described in the [current guidance](#) on reviewing recurring reports. This guidance also provides a standardized naming protocol for electronic files.

8.7.7 Regional Rollup

Each VETS Regional Office is responsible for compiling all of the quarterly reports for the JVSG operating in the states within the region for submission to the National Office as well as the Jobs for Veterans Lead Center. The rollup consists of three major sections: Fiscal, Performance, and Reallocation Recommendation.

The regional rollup is designed and formatted in such a way to assist the Lead Center and National Office, to determine how well grant-funded staff in states are serving veterans, to identify new DVOP and LVER staff for training needs, to

analyze national trends in spending and performance and to advise decision makers about reallocating funds.

8.8 Fiscal Analysis

DVETs provide a comprehensive analysis of the fiscal status of the DVOP and LVER grant funds used and remaining for his or her state agency each quarter. One of the many outcomes of this analysis is an evaluation of how well the JVSG grantee is following its plan. It is imperative that the DVET/GOTR compare the quarterly fiscal report to the grantee's budget plan in order to provide quality technical assistance to the state agency, and also to provide a sound recommendation to the RAVET about what should be done with regard to unobligated funds.

8.8.1 Planned vs. Actual Spending

NOAs provided to the state agencies inform them of the amount of funding, by program, available for them each quarter to drawdown in HHS/PMS. The approved Budget Information forms are the source documents for the initial funding amounts provided on quarterly NOAs. Each NOA specifies the amount of funding previously provided, the net increase or decrease, and the new cumulative amount available for drawdown. While NOAs are normally issued at the beginning of each Federal fiscal year quarter, they may be issued any other time they are warranted, such as to cover a funding period authorized by a CR, or to provide additional funds through a modification approved after the 4th quarter NOA has been issued. The DVET/GOTR should compare the amounts reported on the Federal Financial Report and EDR to the corresponding NOAs to determine if the grantee is spending funds in accordance with their approved plan and provide technical assistance as needed to help the state agency align actual spending with planned spending (possibly augmented or reduced by mid-year modification(s)).

8.8.2 Base Positions Paid (BPP)

BPP are the number of DVOP and LVER positions directly charged to the grant. The BPP should closely reflect the number of positions filled on the Staffing Directory. State accounting systems generally calculate the BPP by comparing the total hours charged to a program code (DVOP, DVOP Special Initiatives, LVER, LVER Special Initiatives, or TAP) to the total hours available for the program if all assigned staff charged every available hour. BPP is reported for each funding source on the EDR and allows the DVET/GOTR to accurately calculate staff utilization rates and cost per position for each funding source.

8.8.3 Staff Utilization

The DVET/GOTR should compare the Staffing Directory submitted with the approved state plan (or most recent modification approved) to the current quarterly submission to ensure the grantee is staffing appropriately.

Note: Calculation of a quarterly staff utilization rate *and* calculation of an YTD staff utilization rate may be needed to effectively evaluate how closely the grantee is following their annual staffing plan:

- To calculate the quarterly utilization rate, use the BPP reported in the "Reported this Quarter" column of the EDR
- To calculate the YTD utilization rate, use the BPP from the "Reported YTD" column of the EDR

Because the JVSG is used to fund DVOP specialists and LVER staff, variations from the approved staffing numbers will negatively impact the state's spending plan:

The DVOP or LVER staff utilization rate can be calculated by comparing the actual BPP reported on the EDR to the number of approved positions identified on the Staffing Directory submitted with the approved annual funding request or most current, approved modification.

The reported BPP for TAP may need to be combined with DVOP or LVER, as appropriate, to get an accurate comparison to the approved plan since the positions planned for TAP may not be identified separately on the Staffing Directory.

Since the positions planned and reported for Special Initiatives are identified separately on both the Staffing Directory and the EDR, the utilization rate for staff funded by a Special Initiative can be separately calculated.

Example #1

Staffing Directory from the approved plan shows 14 full-time and 7 half-time DVOP staff; and the EDR (Reported this Quarter) shows 15.58 BPP:

$$\frac{15.58 \text{ actual positions paid}}{17.5 \text{ approved positions}} = 89\% \text{ DVOP Utilization Rate}$$

In this example, the low utilization rate may lead to surplus funding. The longer the vacancies exist, the greater the surplus leading to funds subject to reallocation. Since the vacancies could have existed anytime during the quarter, the DVET should check the progress of filling them (if not already filled by the time the report is received).

Example #2:

Staffing Directory from the approved plan shows 78 full-time and 4 half-time LVER staff; and the EDR (Reported Year to Date) shows 86.45 BPP

$$\frac{86.45 \text{ actual positions paid}}{80.0 \text{ approved positions}} = 108\% \text{ LVER Utilization Rate}$$

In this example, the state has paid for more positions than approved in their Plan. If not corrected, this will likely lead to a shortage of total funding sometime during the year. Unless a calculation of the quarterly utilization rate shows they have reduced staffing, this state should be encouraged to reduce staff and comply with their Plan.

8.8.4 Cost per Position (CPP)

The CPP is calculated by dividing the aggregate amount expended in each funding source (DVOP, DVOP Special Initiative, LVER, LVER Special Initiative, and TAP) by the BPP paid by that funding source.

Note: When funds from the previous FY were obligated or expended in the 5th quarter, they are included in the aggregate amount of funding expended for the following year. Because funds expended in the 5th quarter only supplement 1st quarter funding, no BPP are attributed to spending during a fiscal year's 5th quarter. All BPP in the 1st quarter are attributed to that quarter and paid by the combination of 5th quarter carry-in and 1st quarter obligations.

You can calculate the quarterly CPP and the YTD CPP. The YTD CPP can be extrapolated to estimate the annual CPP. When compared to the planned amounts, both the quarterly CPP and the estimated annual CPP are useful for analysis.

For the calculation examples below, assume the grantee's approved plan reflects the following information for the LVER program:

- Total forecast for LVER Activities: \$1,350,000
- Total forecast for LVER Special Initiatives: \$76,000
- Total forecast for TAP: \$32,000
- Total TAP Workshops planned: 24
- Total LVER positions forecast: 19.5 FTE

The forecast CPP for all LVER staff then would be:

$$\frac{(\$1,350,000 + \$76,000 + \$32,000)}{19.5} = \$74,769 \text{ per position}$$

For the calculation examples below, assume the third quarter report submitted by the state shows:

Expenditure Detail Report (QTR) - Third Quarter			
LVER (LVER Activities does not include LVER Special Initiatives or TAP)			
Base Positions Paid for LVER Activities:	17.92	17.95	17.93
Direct Outlays for LVER Activities:	\$591,491.00	\$296,368.00	\$887,859.00
Indirect Outlays for LVER Activities:	\$76,436.00	\$38,541.00	\$114,977.00
Subtotal Outlays for LVER Activities:	\$667,927.00	\$334,909.00	\$1,002,836.00
Base Positions Paid for LVER Special Initiatives:	0.98	0.97	0.98
Direct Outlays for LVER Special Initiatives:	\$31,899.00	\$15,874.00	\$47,773.00
Indirect Outlays for LVER Special Initiatives:	\$7,999.00	\$3,987.00	\$11,986.00
Subtotal Outlays for LVER Special Initiatives:	\$39,898.00	\$19,861.00	\$59,759.00
#TAP Workshops Facilitated by Grant Funded Staff:	12	6	18
Base Positions Paid for TAP:	0.34	0.34	0.34
Direct Outlays for TAP:	\$12,324.00	\$6,012.00	\$18,336.00
Indirect Outlays for TAP:	\$1,234.00	\$652.00	\$1,886.00
Subtotal Outlays for TAP:	\$13,558.00	\$6,664.00	\$20,222.00
Subtotal Outlays for Incentive Awards:			
Subtotal Outlays for LVER:	\$721,383.00	\$361,434.00	\$1,082,817.00
Federal Share of LVER Unliquidated Obligations:			
Total LVER Fund Outlays and Obligations:	\$721,383.00	\$361,434.00	\$1,082,817.00

Examples:

1) Calculate the quarterly CPP for all LVER staff:

$$= \frac{(\$334,909 + \$19,861 + \$6,664)}{(17.95 + 0.97 + 0.34)} = \$18,766/3^{\text{rd}} \text{ quarter}$$

2) Calculate the YTD CPP for TAP:

$$= \frac{\$1,082,817}{(17.93 + 0.98 + 0.34)} = \$56,250/\text{YTD}$$

3) Estimate the annual CPP for all LVER staff

a)
$$= \frac{\$56,250}{3 \text{ (quarters to date)}} = \$18,750 / \text{quarter (average)}$$

$$b) \$18,750/\text{quarter} * 4 (\text{quarters}) = \$75,000 \text{ estimated annual CPP}$$

4) Compare the estimated annual CPP to the planned CPP:

$$= \frac{\$75,000}{\$74,769} = 100.31\%$$

8.8.5 Cost per TAP Workshop

For those states where grant-funded staff facilitate TAP Employment Workshops, the average cost per TAP Employment Workshop is determined by dividing the total amount spent on TAP by the total number of workshops facilitated by grant-funded staff. The actual cost per workshop should be compared to the planned cost per workshop.

1) Using the same EDR source data listed in the examples above for CPP, you see that the planned cost per workshop is:

$$= \frac{\$32,000}{24} = \$1,333 / \text{workshop}$$

2) The actual cost per workshop to date is:

$$= \frac{\$20,222}{18} = \$1,123 / \text{workshop}$$

3) The comparison of actual cost per workshop to planned cost per workshop is:

$$\frac{\$1,123}{\$1,333} = 84\%$$

8.8.6 Unliquidated Obligations

Unliquidated obligations are funds that have been obligated, but not yet 'expensed' by the state. In other words, they are bills that have been incurred, but not yet

paid. For example, a state agency may order equipment (computers) for grant-funded staff in one quarter, but the payment may not be made until the supplies (equipment) is actually delivered in the following quarter. The funds will be obligated in the quarter they were ordered and reflected as "Unliquidated Obligations" in the appropriate section of the EDR and on the corresponding Federal Financial Report. Unliquidated obligations cannot be included in the amount considered for reallocation because funds need to be retained to cover payment upon receipt of those bills.

8.9 *Evaluating and Improving Performance*

Each quarter, the state agency is required to provide the DVET with copies of the ETA 9002 and VETS 200 reports which detail various aspects of the state agency's activity and performance. While the reports indicate they are for a certain time period i.e. Quarter Ending..., they actually contain data for a "rolling four quarters." Large variations in performance outcomes can occur between quarters due to seasonal employment variations, large numbers of demobilizing Reserve/Guard members, and other factors. The rolling four quarters approach to performance evaluation examines performance trends that reflect a four quarter average. Evaluating a year's worth of data each quarter removes cyclical quarter to quarter fluctuations to more clearly pinpoint overall performance trends which improve the accuracy of forecasts.

Even though all performance reports represent a rolling four quarters, or full year (four quarters), of data, VETS negotiates performance measures on a PY basis, primarily because the larger ETA grants are funded and evaluated on a PY basis. Since performance outcomes are reported each quarter, the DVET should begin to analyze performance the quarter immediately following negotiation. Analysis should focus on evaluating the accomplishments of the state workforce agency and grant-funded staff and the progress each has made toward reaching the negotiated goals.

While the quarterly outcomes are important and deserving of attention, each state agency is expected to meet its negotiated goals by the quarter ending June 30th. The DVET is not required to take formal action or institute a Corrective Action Plan for failing to meet goals in the preceding quarters, but a good analysis and early suggestions for correction may have a positive impact on future state agency accomplishments, to some degree.

That is, since entered employment and employment retention rates are based on wage records, there is significant lag time between the period in which a participant "exits" the program and when he or she is formally reported in the outcomes. The results of technical assistance provided by the DVET to improve performance outcomes will not be immediately evident, so it should be offered as soon as a problem, or once a negative trend, is identified.

Desk audits and on-site reviews of offices are an integral part of evaluating the state agency's performance. The following sections provide more detailed

information on the factors that may affect performance outcomes and suggestions on how to evaluate indicators of service.

8.9.1 External Factors

Some factors that may negatively impact performance outcomes are external to the state agency and are not directly controllable. The list of external factors is extensive; some examples are:

- Emergent economic conditions;
- Unemployment rates;
- Loss of major industries or downsizing;
- Decreased JVSG funding;
- State imposed mandates such as hiring freezes and travel bans;
- High turnover rates for grant-funded staff;
- Funding cuts in other programs such Wagner-Peyser and WIA; or,
- Larger than anticipated numbers of demobilizing National Guard and Reserve members.

Even though the state agency cannot control these factors, they must develop strategies and take actions to react to them. A DVET that helps the state agency focus attention on one or more of the many internal factors (those the state agency can control) listed in the next section may assist the state agencies improve performance outcomes, even during economic downturns.

8.9.2 Internal Factors

There are factors over which the state agency can exert some control to improve performance outcomes, i.e. staff location, staff assignment and utilization, training, etc. VETS staff should provide technical assistance to grantees to examine those factors that can be controlled such as:

- Triaging veterans in the service delivery points to ensure grant-funded staff help those most in need;
- Targeting services to specific categories of veterans to keep from spreading resources too thin;
- Assigning limited grant-funded staff to locations most in need;
- Converting grant-funded staff to full-time rather than half-time; or
- Changing the mix of grant-funded staff to serve those most in need (changing LVER staff to DVOP specialists and vice versa).

8.9.3 Other Performance Indicators

The Common Measures described in section 8.6.6. were developed as a means to evaluate programs with similar goals. OMB developed the uniform evaluation metrics for job training and employment programs in an effort to institute uniform definitions for performance. The common measures for job training and employment apply to 31 programs administered by 6 Federal Agencies.

Even though state agencies report and VETS evaluate the outcomes for these Common Measures, a look at other performance indicators can be very useful. Performance indicators should reflect the goals and strategies of an organization and should be quantifiable. For the JVSG, performance indicators should be evaluated to:

- Ensure grant-funded staff serve only veterans and other eligible persons when charging their time to the JVSG;
- Veterans and other eligible persons receive priority of service in all DOL funded programs; and
- Veterans and other eligible persons served by grant-funded staff need and receive more than the core services available to the general population served by Wagner-Peyser staff.

The ETA 9002A-D and VETS 200A-C reports, submitted by the states quarterly, allow the DVET/GOTR to assess grantee performance in meeting their negotiated performance goals. These reports can also be used to measure priority of service to veterans seeking employment and employment assistance.

DVET/GOTRs can identify:

- The number of participants being served,
- Whether priority of service is observed,
- Who is providing services to veterans and non-veterans,
- Referral rates of veterans compared to non-veterans,
- Whether the DVOP and LVER are preserving their separate roles, and
- Outcome results (entered employment rates, employment retention rates, and average earnings/wage gains).

8.9.3.1 Service to Non-Veterans

DVOP specialists and LVER staff exclusively serve veterans, TSMs, and other eligible persons (certain spouses) during the time they are paid by the JVSG. In accordance with the Special Grant Provisions, the following is the priority order of veterans and eligible persons served by DVOP specialists and LVER staff:

- Service-connected disabled veterans;

- Veterans who served on active duty during a war or in a campaign or expedition for which a campaign badge or expeditionary medal has been authorized;
- Recently separated veterans;
- Other eligible veterans; then
- Eligible spouses (other eligible persons).

States may identify other populations of veterans and eligible persons that will be targeted for outreach and services.

States cannot use grant-funded staff to serve other customers under any circumstances. Grant-funded staff should not be assigned to work in common areas of the One-Stop or service delivery point such as referral desks or resource rooms where they may be required to provide services to non-veterans. DVETs should closely monitor the number of non-veterans served by grant-funded staff reported on the VETS 200 reports and require an explanation from the grantee when the numbers are not justified.

8.9.3.2 Veterans Served by Grant-Funded vs. Non-Grant Funded Staff

Even though grant-funded staff serve veterans, TSMs, and other eligible persons exclusively, it is not VETS policy to require or recommend that every veteran seeking employment services be seen by a DVOP specialist or LVER staff. The efforts of DVOP specialists and LVER staff should focus on those veterans with barriers to employment, disabled veterans and others who need staff-assisted service or intervention to break into or reenter the civilian labor market. As specified in [ASVET Memorandum 01-08](#), "DVETs in particular must continue working with the states to improve the way priority of service is provided for veterans in the One Stop Career Centers. For example, while some states continue to send every veteran to a DVOP or an LVER, not every veteran needs to be serviced by a veterans' representative. Some should go directly into training opportunities or other services by One Stop service and training providers."

One means of determining the extent to which the state agency (or a particular One-Stop Center or employment office) is referring most or all veterans to the DVOP specialist or LVER staff is by reviewing the ETA 9002B and the VETS 200A and/or VETS 200B and comparing the total number of veterans and other eligible persons receiving staff assisted services by the entire staff vs. the grant-funded staff.

8.9.3.3 Rate of Referral

States sometimes compare the rate of referral to employment for veterans to that of non-veterans and, if the latter rate is lower, cite it as evidence of priority of service. While a higher rate of referral to employment for veterans may be an indicator of priority of service, it is advisable to look beyond that statistic to determine how efficiently the state agency is exercising its responsibility. For example, comparing the entered employment rates for veterans and non-veterans

could lend some perspective to the referral rates. If a state agency notes that its rate of referral to employment is X% higher for veterans than non-veterans, but the entered employment rates do not show a comparable margin in favor of veterans, the DVET should examine why not. While there may be legitimate reasons for a variance, the DVET may find that the state agency is simply referring veterans to jobs for which they are not suitable or qualified, which is neither efficient nor advisable. Priority of service should be demonstrated by results, not just by generating activity.

8.9.4 Technical Assistance to Improve Performance

State Agencies determine the number of half-time and full-time DVOP specialists and LVER staff appropriate to carry out services to veterans, where grant-funded staff will be located, and what their specific job duties are. VETS has issued [policy guidance](#) on staff roles and responsibilities to help state agencies make effective and responsible staffing decisions:

- To the greatest extent possible, full-time DVOP specialists and LVER staff should be assigned at every location with sufficient resources to support the assignment of full-time staff, rather than assigning two or more half-time DVOP specialists or LVER staff;
- No person shall be employed both as a half-time DVOP specialist and a half-time LVER staff;
- When charging time to the JVSG, grant-funded staff can only perform duties consistent with the appropriate roles and responsibilities for services to veterans;
- States must identify all half-time and full-time staff who directly charge the grant for their time, including veterans' coordinators, on all Staffing Directories;
- Time distribution records will be maintained for each half-time DVOP specialist and LVER staff that indicate how their time is distributed to ensure that at least 50 percent of their time is devoted to serving veterans only; and,
- Decisions to convert current full-time DVOP specialists and/or LVER staff to half-time should be done in consultation with the DVET to determine if a modification to the state plan is needed.

Many of the staffing decisions made can greatly impact performance outcomes. The DVET should provide technical assistance to the grantee to maximize the effectiveness of grant-funded staff.

8.9.4.1 Staff Location

Changes to the locations where grant-funded staff are assigned can, in many situations, improve performance. For example, if the LVER staff or DVOP specialists are assigned to offices where the population of veterans seeking work is lower than

other locations, VETS staff may recommend that they be reassigned they are located where they can have maximum exposure to veterans needing work, training, etc.

8.9.4.2 Diverse Roles and Responsibilities

DVOP specialists and LVER staff concentrate their efforts, according to their respective roles and responsibilities, on outreach and the provision and facilitation of direct client services to those who have been identified as most in need of intensive employment and training assistance. Through outreach with employers, LVER staff develop increased hiring opportunities within the local workforce by raising the awareness of employers of the availability and the benefits of hiring veterans. VETS guidelines are in place to ensure that the two grant-funded positions maintain their separate roles and responsibilities. States use the VETS guidance to establish performance standards that are in line with regulations and grant provisions.

The roles and responsibilities provide the states with a framework that includes two key elements: 1) required core roles for DVOP and LVER staff, and 2) listings of examples of responsibilities that are appropriate for each of the required roles. States are required to maintain the core roles for each position but have the flexibility to add other appropriate responsibilities. This dual structure provides states with the opportunity to tailor DVOP specialist and LVER staff performance responsibilities to reflect the requirements of their unique service delivery environment while maintaining the differences between the two positions.

When evaluating performance outcomes, DVETs should evaluate how well defined roles and responsibilities for grant-funded staff align with the needs of the populations of veterans being served.

8.9.4.3 Other Staffing Factors

For the purpose of the JVSG, part-time is defined as half-time. The Jobs for Veterans Act provided flexibility to states by allowing them to choose which SDPs are staffed with DVOP specialists and/or LVER staff. The Special Grant Provisions and subsequent guidance make clear that, to the greatest extent possible, full-time DVOP specialists and LVER staff should be assigned at every location with sufficient resources to support the assignment of full-time staff, rather than assigning two or more half-time staff. The main justification for using half-time DVOP specialists and/or LVER staff is to provide services in multiple or remote locations in states with limited funding and/or in SDPs without enough workload to justify a full-time position. In most cases, one or more full-time employees dedicated to serving only veterans and other eligibles is more effective than multiple half-time employees dividing their time between different programs servicing diverse populations and customers. Exceptions to this policy must be justified by explaining how services to veterans will be improved.

It is VETS policy that no one individual will be concurrently employed in both part-time DVOP and part-time LVER capacities. The intent of Congress is to have two separate programs that provide distinctly different services.

Every effort shall be taken by state agencies to hire qualified veterans for both DVOP and LVER positions in the following order of priority: 1) Qualified service-connected disabled veterans; 2) Qualified eligible veterans; 3) Qualified eligible persons, as defined in Title 38 U.S.C., Section 4101(5). Non-veterans may be appointed to DVOP and/or LVER positions only after all means of recruiting qualified service-connected disabled and other veterans have been exhausted.

Per Title 38 U.S.C. 4102A, (c), (B), the state must, "on an annual basis, notify the Secretary of and provide supporting rationale for, each non-veteran who is employed as a disabled veterans' outreach program specialist and local veterans' employment representative for a period in excess of six months". This notification is made to the appropriate DVET and may be made in the Technical Performance Narrative with a Quarterly Report or under separate cover.

8.9.4.4 DVOP Specialists vs. LVER Staff

In order to best serve job-seeking veterans effectively and efficiently, VETS, through the development of roles and responsibilities for each position, provides a framework that includes required core roles of a DVOP specialist and LVER staff, and examples of responsibilities appropriate for each of the core roles. This dual structure is intended to provide grantees with the ability to tailor DVOP specialist and LVER staff performance plans to reflect their unique service delivery structure and the particular situation in their state while maintaining the differences between the two programs.

DVOP specialists facilitate intensive services to veterans with special employment and training needs. These are known as barriers to employment. Training courses are available on intensive services using the case management approach through NVTI. In order to qualify as intensive services, DVOP specialists may include any combination of the following services, but at a minimum the first two are required:

- Conduct an assessment (minimum requirement)
- Develop plan of action that is documented (minimum requirement)
- Provide career guidance
- Coordinate supportive services
- Make job development contacts
- Provide referrals for training
- Make referrals to job openings

DVOP specialists should target services to Special Disabled veterans, disabled veterans, economically or educationally disadvantaged veterans, and veterans with other barriers to employment, especially homeless veterans. In order to maximize services to those veterans, DVOP specialists conduct outreach activities at a variety of sites including, but not limited to:

- Vocational Rehabilitation and Employment programs

- Homeless Veterans' Reintegration Project grantees
- Department of Veterans Affairs medical centers and Vet Centers
- Homeless shelters
- Civic and service organizations
- Community Stand Downs
- Military installations
- WIA partners
- State vocational rehabilitation agencies

LVER staff work with other service providers to promote veterans, as job seekers who have highly marketable skills and experience, to employers. They advocate for veterans for employment and training opportunities with business, industry and community-based organizations. To accomplish this, LVER staff must participate in a variety of outreach activities including, but not limited to:

- Planning and participation in job fairs
- Coordinating with unions, apprenticeship programs, and business organizations to promote employment and training opportunities for veterans
- Promoting credentialing and training opportunities for veterans with training providers and licensing agencies

LVER staff provide and facilitate a full range of employment, training and placement services to meet the needs of veterans with priority given to targeted categories identified and approved in the state plan. These services may include, but are not limited to the provision of:

- Job search assistance workshops
- Job development and referrals
- Vocational guidance
- Labor market information
- Referrals to training and supportive services

The needs of veterans being served by a local office or in a geographic area and the local labor market should be considered when deciding whether grant-funded staff are assigned as DVOP specialists or LVER staff. State agencies should periodically review the role assignments to ensure that DVOP and LVER staff continue to be appropriately utilized to maximize opportunities for the veterans seeking employment or training-related assistance.

8.9.4.5 Staff Training

[P.L. 109-461](#) stipulates that all DVOP specialists and LVER staff appointed to their position after January 1, 2006 receive specialized training from NVTI or current contractor. Affected DVOP specialists and LVER staff have three years to complete the designated specialized training:

- Labor and Employment Specialist and Promoting Partnerships for Employment for LVER staff;
- Labor and Employment Specialist and Case Management for DVOP specialists.

These core training classes provide the foundation needed by grant-funded staff, but other training may be needed to improve performance outcomes for veterans. The DVET should provide technical assistance to the grantee to identify problem areas that may be improved or corrected with additional training as well as the resources for the training.

8.10 Priority of Service

The Jobs for Veterans Act, codified at 38 U.S.C. 4215, makes priority of service for veterans (or other covered persons) mandatory in all workforce and job training programs funded in whole or part by the U.S. Department of Labor. ETA issued [guidance](#) that lists 20 different programs covered by the law. For all covered programs, veterans must meet the basic eligibility requirements in order to obtain priority of service. When a veteran meets the basic eligibility requirements for a particular program, he or she is deemed "qualified" for participation in that program. Priority of service requires that a "qualified" veteran or other covered person be given priority over a "qualified" non-veteran for the receipt of employment, training and placement services provided under that program, notwithstanding any other provision of the law.

The Department's strategic vision for priority of service to covered persons honors veterans and certain spouses of veterans as our "heroes at home." It envisions DOL-funded employment and training programs that provide outreach and comprehensive service delivery to covered persons as part of strategic workforce development activities across the country. Priority of service for veterans is an important acknowledgment of the sacrifices of the men and women who have served in the U.S. armed forces.

Priority of Service will be monitored by both VETS and the applicable Grantor Agency in accordance with the departmental regulations ([20 CFR, Part 1010.240](#)).

8.10.1 Covered Programs

The [ETA guidance](#) on Veterans' Priority of Service lists 20 DOL programs subject to the requirement. In the list below, an asterisk (*) after a program name indicates that veterans' priority will compete with the program's existing statutory priorities. Prior to program participation, an individual's veteran's status will be assessed at

the same time as the program's distinct eligibility provisions, so as to not disrupt the core function of the program.

- WIA Adult program*
- WIA Dislocated Worker program*
- Wagner-Peyser Employment Services
- Community-Based Job Funding Grants
- Trade Adjustment Assistance Programs
- National Emergency Grants
- Senior Community Service Employment Program*
- Migrant and Seasonal Farm Worker Program
- Indian and Native American Program
- H-1B Technical Skills Training Grants
- Job Corps
- Office of Disability Employment Programs
- Welfare to Work Program*
- Veterans Workforce Investment Program
- WIA Youth Program*
- Labor Market Information Formula Grants
- Pilots and Demonstration Grants
- Research and Development
- Career One-Stop Electronic Tools
- Other Internet based tools operated by US DOL grantees

Priority of service ensures that covered persons receive priority employment and job training services that will effectively integrate them into the economy. The priority of service regulatory provisions are implemented to help ease the transition of service members to civilian careers and to honor their service and sacrifice. It does not change a program's intended functions; covered persons still need to meet all eligibility and program requirements for participation. In any decision on how to allocate funds and approve training slots, qualified veterans have priority over qualified non-veterans.

At the local level, priority of service is also a 'mindset' within the One Stop Career Centers that stresses partnership and collaboration among all One Stop partners and program providers in order to integrate veterans and TSMs into the civilian

workforce as smoothly and seamlessly as possible. Functional alignment within the One-Stop system supports this priority of service by ensuring that veterans and other eligible persons have access to a full range of employment and training services, not limited to the labor exchange services provided by either Wagner-Peyser funded staff, DVOP specialists or LVER staff.

8.10.2 Measures of Priority of Service

Veterans exercising their right to priority of service should expect assistance that goes far beyond the mention of or referral to a DVOP specialist or LVER staff. When evaluating the extent veterans receive priority of service VETS staff should:

- Determine and verify how each state agency, One-Stop Career Center, and other service delivery points (SDP) provide and locally monitor priority of service;
- Determine and verify how veterans are made aware of their entitlement;
- Determine and verify how other program provider staff are made aware of their responsibilities to provide priority of service;
- Determine how veterans are made aware of the special assistance available from DVOP specialists and LVER staff; and
- Determine how the grantee addresses prioritization of special populations of veterans identified in the State plan.

8.10.2.1 Integration in the One-Stop Career Center

With the implementation of the [Workforce Investment Act \(WIA\) of 1998](#), (P.L. 105-220) DVOP specialists, LVER staff, Wagner-Peyser funded staff, and staff funded other employment-related programs were integrated into a nationwide network of One-Stop Career Centers. These centers deliver a significant percentage of all qualified job training services and are required to implement priority of service. All One-Stop Career Centers should have clear strategies for providing veterans and certain spouses of veterans with the highest quality of service at every phase of services offered. Veterans who seek One-Stop Career Center services must be:

- Provided the full array of services available within the system;
- Empowered with customer choice and given customized access to those services which satisfy their individual needs for career development;
- Provided information on and priority of service in all covered programs; and
- Provided access to a universal career center system to ensure that there is 'no wrong door.'

8.10.2.2 Indicators of Integration

States are required to submit a plan of service for veterans and detail among other things, how DVOP specialists and LVER staff are integrated into the One-Stop Career Centers. This integration can range from basic functions of the One Stop System, such as assistance with job search and the need for skills training, to more customized initiatives such as creating pathways into high growth sectors of the economy. The One-Stop system will draw on all available resources to support the needs of covered veterans and their spouses to meet their specific needs and concerns.

Some examples of integration are:

- Communication between DVOP and LVER staff with other staff in the One-Stop Center;
- Direct Provision by One-Stop Center staff of information to veterans concerning all of the resources available to them; and, then helping them to access and use that information;
- Inter-office coordination and communication on how to best meet the unique needs of veterans seeking employment or training-related services through interactive cooperation; and
- Ensuring at all levels, staff awareness and understanding of the state's strategy to integrate DVOP and LVER staff into the One-Stop Centers.

8.10.2.3 Technical Assistance

DVET technical assistance should be aimed at assisting the state agency to identify problem areas and find solutions to meet established performance goals and prevent deficient performance. DVETs should anticipate problems and issues and provide guidance to help state agency staff comply with priority of service requirements. When performing an on-site visit, the DVET should be able to make the applicable sections of legislation, regulations and policies to reinforce or emphasize requirements.

8.10.2.4 Best Practices

DVETs are encouraged to discuss review findings with other VETS staff to learn from each other's experiences and identify practices and strategies that might benefit veterans in their state. While not an all-inclusive list, some examples of best practices are:

- Conducting periodic, recurring internal training with all One-Stop staff that facilitates idea sharing, identifies common barriers encountered, and brainstorms strategies to overcome them;
- Providing job ready veterans with access to personal computers and all electronic placement services and programs within the One-Stop Center, rather than simply referring them to a DVOP specialist or LVER;

- Mapping out customer flow and developing necessary procedural linkages between service modalities to ensure all appropriate services are easily accessible by veterans.
- Restricting DVOP client services for those who have barriers to employment and need intensive services beyond the core level; and ensuring that Wagner-Peyser and other partner staff provide core services to veterans who are job ready;
- Marketing job seeking veterans to the business community by all One-Stop Center staff;
- Ensuring LVER direct access to the One-Stop Career Center Manager to make recommendations to improve services to veterans;
- Ensuring understanding by all partner staff of programs and services for veterans and ensuring DVOP specialists and LVER staff fully understand all of the partner services, so that mutual awareness of supportive services and employment opportunities maximize job or training prospects for veterans; and,
- Services to veterans are considered an all-staff responsibility and all staff are trained on how to identify eligible veterans.

8.11 State Agency Assessment Process

The JVA amended previous prescriptive legislation governing the provision of employment and training service to veterans to modernize and integrate these services into the present Workforce System. Envisioning a partnership between the State Agencies and the USDOL required VETS to transition from an inspection, compliance, and enforcement focus toward a more cooperative, technical assistance, coaching, training and program review process.

The State Agency Assessment process is designed to encourage coordination and integration and to validate those services being provided at each Service Delivery Point (SDP). For the purposes of Self-Assessment, a SDP is defined as any workforce development delivery point where USDOL funds are allocated to provide employment and training to veterans, as determined by the state administrator and the DVET.

The assessment of the state agency has three distinct parts:

- Self-Assessment of the SDP, DVOP Specialist(s), and LVER staff
- Validation of the SDPs that completed self-assessments; and
- Overall assessment of the State Workforce Agency.

8.11.1 The Self-Assessment and Validation Review Process

In 2004, VETS developed a Self-Assessment and SDP Validation Review process for local office reviews. The [implementing guidance](#) and accompanying [Technical](#)

[Assistance Guide](#) (TAG) prescribed [self-assessment forms](#) to be completed by each SDP manager, DVOP specialist and LVER staff. These forms may be customized, as approved by the DVET, to address specific policies and processes unique to a state and/or its plan. In customizing these forms, the DVET should include questions that will help him or her complete the annual State Summary Report, described in Chapter 10 of the TAG, at the end of the review cycle.

The goal of the self-assessment process is to evaluate the level and quality of services veterans receive from individual SDPs. An integral part of the process is evaluating the effectiveness of the DVOP and LVER programs and whether they are being operated in accordance with the approved state plan. The completed self-assessments should provide insight into the provision of services to veterans. Specifically, the self-assessments should be reviewed to determine if the SDP:

- Has implemented policies and procedures that are noteworthy and should be identified as best practices;
- Is achieving a level of performance that meets or exceeds the goals outlined in the state plan; or
- Is not achieving an acceptable level of performance indicating technical assistance or corrective actions are needed to progress toward acceptable level of performance.

8.11.1.1 Choosing Service Delivery Points

DVETs are encouraged to work with their state partners to ensure that a self-assessment is completed on a minimum of 20 percent of the SDPs within the state. The selection of the SDPs should be made randomly and every SDP should take part in the self-assessment process at least once during the 5-year grant cycle. Therefore the random selection of SDPs should be made from the pool of SDPs not previously selected in the same grant cycle. While 20 percent is the minimum level, DVETs or RAVETs may elect to request self-assessments from as many additional SDPs as are necessary to give the DVET an appropriate level of confidence that provisions of the grant and the state plan are being met and that all SDPs have been reviewed each multi-year grant cycle. Priority should be given to SDPs that:

- Require on-site technical assistance as requested by the state agency; or
- Require on-site technical assistance based on information identified either on the self-assessment tool or through other reliable sources that cannot be resolved telephonically or via additional information requests.

On-site validation reviews of the results of the self-assessment will be made for all offices selected for self-assessment. For example, if a state has 100 SDPs, at least 20 of those would be selected to complete the forms for self-assessment and receive an on-site review by the DVET to validate the submission.

8.11.1.2 Timeframe for Requesting Self-Assessment Forms

The self-assessment process should begin early in the fiscal year. This will allow the DVET and his/her state partners sufficient time to complete the entire schedule and complete all self-assessment and on-site validation review actions without creating undue hardship on any of the parties involved. The entire process must be completed before the DVET can draft and submit the annual State Summary Report that is due to the RAVET in November of each year.

8.11.1.3 Steps in the Process

The self-assessment and validation review process consists of the following steps:

- 1) VETS staff meet with the appropriate state agency representative(s) and customize the self-assessment questionnaires to fit local needs;
- 2) Establish a mutually agreed upon schedule for the validation reviews;
- 3) Establish dates for distribution of the self-assessment questionnaires based on validation review dates for the selected SDPs;
- 4) States notify the SDPs of the scheduled review and distribute the questionnaires requesting their return at least 30 days prior to the scheduled validation review;
- 5) When questionnaires are returned to VETS staff through state agency channels, the questionnaires are reviewed and if needed, the DVET schedules a meeting with the appropriate state representative(s) to discuss areas of concern;
- 6) Invite appropriate state agency representative(s) to participate in the validation review;
- 7) Review preliminary data, reports and other applicable information;
- 8) Conduct the on-site validation review;
- 9) Analyze the results of the validation review;
- 10) Meet with SDP management and the appropriate state agency representative(s) to discuss results;
- 11) Provide/arrange for technical assistance or training, if needed; and
- 12) Prepare and transmit an appropriate close out letter or report.

Note: In some DOL regions where ETA coordination has been achieved Federal Project Officers (FPOs) may accompany VETS staff on state agency assessment and/or validation reviews.

8.11.2 Review Preliminary Data and Available Reports

There are a number of reports and documents available that will provide a "snapshot" of how well an office is working and the type of assistance most

frequently requested. After receiving the completed self-assessments, VETS staff can obtain and review the following information and reports to determine how well individual offices grant-funded staff are performing:

State Plan - As required by Title 38 U.S.C. 4102A, each grantee is required to submit an annual state plan to receive JVSG funding. VETS staff should be completely familiar with the state plan for Services to Veterans to verify that the strategies it lays out are being implemented at the local level.

State Directives – VETS staff conducting validation reviews should review state agency directives to ensure accuracy and compliance with VETS policies and procedures, to determine whether or not the state agency has disseminated policy to field offices, and to verify they have implemented the proper roles and responsibilities for DVOP specialists and LVER staff.

State Office Reviews - Some states conduct internal assessments of their own operations and will publish written reports. These reports usually identify "Best Practices", "Areas of Concern" and "Compliance Issues". DVETs should work with the appropriate state agency representative to offer technical assistance and guidance in preparation for their self-assessments; participate in developing published reports; and utilize findings as a tool to assist in their own validation reviews.

VETS 200 A-C DVOP/LVER Quarterly Performance Reports - These reports shows the number of individuals served by grant-funded staff and the type of service they received. It also indicates services provided to non-veterans that may need to be explained by the state agency, SDP or local office.

ETA 9002 A-E– These reports show the types of services and number of veterans served by all staff on a state-wide basis and enables VETS staff to determine an approximate number of veterans served by other than grant-funded staff (and may be used to determine whether grant-funded or non-grant-funded staff provide the majority of staff assisted services to veterans).

Manager's Report on Services to Veterans - This quarterly activity report provides a snapshot of veterans' services provided at the local level.

SF 424A - An analysis of this form compared to expenditure reports can be used to verify that grant dollars are spent in accordance with the state plan.

Veterans' Program Letters (VPLs) – VETS disseminates policy and guidance to state agencies and JVSG grantees via VPLs. Reviewers should ensure that state officials are aware of applicable active VPLs accessible from VETS' Home Page and they institute and disseminate policies and procedures that implement the guidance.

Quarterly Technical Performance Narrative (TPN) - As part of the grant agreement, the grantee is required to submit a quarterly technical performance narrative, which addresses both performance outcomes and analyzes grant obligations/expenditures.

Time Charges - state accounting systems produce reports that identify time and other costs charged to the JVSG. VETS staff should become familiar with cost accounting system and terminology for their state to ensure expenditure reports are accurate and that the state is following their spending plan.

8.11.3 Desk Audits

Desk audits can be completed when an actual on site-visit cannot be accomplished. VETS staff should review the same documentation they would before going on-site. Any information that would be reviewed at the site may be requested to be sent to the reviewer's office by e-mail, fax or postal service. Staff interviews can be done over the telephone if needed. Every attempt to get all of the information described in section 8.11.4 below should be made to ensure as thorough a review as possible is achieved.

8.11.4 On-Site Validation Reviews

When conducting an on-site validation visit, there are a number of concrete indications that veterans receive priority of service. You should evaluate physical indicators and ask yourself:

- Are veterans' services information in plain view when you are in the reception or waiting area of the one-stop career center or SDP?
- How are you greeted by the lobby staff; do they try to ascertain whether or not you are a veteran?
- Does the front desk or reception desk have a sign-in sheet for veterans or information on the services available from a "veterans' representative" in plain sight;
- Can you verify by touring the center that the partners within the office area are familiar with the veterans' priority of service and if it is routinely observed?

There are items you can request to see while you are at the SDP in addition to your interviews and time spent with the DVOP specialists and LVER staff on-site:

- Review local activity reports, if available;
- Review the local office marketing plan to determine how veterans are marketed and the role of the LVER in the plan;
- Review the performance plans or standards (not the individual appraisals or evaluations) for assigned DVOP specialists and LVER staff to make sure they are up to date and reflect the roles and responsibilities within the scope of the law;
- Review any locally developed documents that the DVOP specialist and LVER staff assigned may use to assist veterans; and

- Review memoranda of understanding (MOUs) or applicable written agreements.

When meeting individually with assigned grant-funded staff, try to meet in a private office area where they will feel comfortable speaking openly with you. Review a random sample of case management files. Discuss any assigned outstation locations they cover, training they received, workshops in which they participate, out-of-office activities performed, how many veterans they routinely see daily or weekly, and any issues they may have.

When interviewing local office managers, ask them to:

- Describe how they ensure priority of services to veterans.
- Describe how they inform veterans of the services available for them including those provided by partner agencies;
- Describe how they ensure veterans most in need receive intensive services from DVOP specialists and/or LVER staff;
- Describe how services for veterans are integrated into each of the partner agencies' activities;
- Describe any barriers to fully integrating the veterans program into the programs and activities of partner agencies that have been encountered; and,
- Describe any steps that have been taken to mitigate those barriers, and whether or not those steps were successful.

8.11.5 Analyzing Information from the Validation Review

Review and consider all information you gathered during your on-site visit: interview notes, on-site reports, state agency guidance, agreements, programs or plans, case management file review notes, your overall perception of the lobby, reception, resource room, meeting or workshop rooms and other office areas, and your overall observations of activities and interactions of partner agency staff. Determine if there are services that the office or grant-funded staff provide well, what services or activities they may need to improve, issues to consider or potential problems that may have been observed. Be able to relay the overall findings (see 8.11.6 below) in an exit interview or "debriefing" with office management. When other VETS staff conduct validation reviews, they should debrief the DVET upon return to their office(s) once their findings have been organized, and analyzed and are prepared to produce their after-action reports.

8.11.6 Discussion of Results with State Representative(s)

After each office validation visit, coordinate a schedule for a DVET out brief, either on-site or by telephone, with office management or supervisory staff that the site deems necessary to verbally relay what has been learned, observed or related

during the site visit. The DVET or his/her representative will share best practices and suggestions for improvement and will offer to assist in the process.

8.11.7 The Close-Out Letter

After returning to your office a letter must be drafted that summarizes the site visit. As a "wrap up" of the events, interviews, and determinations that occurred at each site, a 'close-out letter' drawn from the DVET's after-action or validation visit report should be developed to provide information that is useful to the state agency and that the DVET can use to create the annual State Summary Report.

8.11.8 The Annual Summary Report

The results of the self-assessment and validation processes give the DVET much of the information necessary to complete the annual State Summary Report. The report, submitted to the Regional Administrator in November of each year, provides a comprehensive assessment of how well the state agency is meeting regulatory requirements in implementing the JVSG state plan and how effectively it is stewarding JVSG funds to achieve program goals. The report should cover overall state plan implementation and adherence of grants-funded staff to the DVOP/LVER roles and responsibilities. A template for the report is provided in Chapter 10 of the Self-Assessment TAG.

8.12 *Corrective Actions* (pending)

8.13 *Stakeholder Outreach and Coordination*

8.13.1 VR&E (pending - will link to new VR&E TAG)

8.13.2 Recovery and Employment Assistance Lifelines Program (REALifelines)

REALifelines provides information and assistance for the economic recovery and employment or reemployment of service members who were seriously wounded or injured in Operation Iraqi Freedom (OIF) or Operation Enduring Freedom (OEF) and are transitioning to civilian life. The program addresses the employment needs of participants, identifies any barriers to employment they might have, and helps them overcome these barriers. REALifelines, which is administered by VETS, is a collaborative partnership among the DOL, the DoD, the VA, the state agency, and private and public employers.

In accordance with the [REALifelines TAG](#), the DVET, or their designee, will serve as the primary liaison between the VETS Region, the REALifelines participant, the state agency, and other local partners. The DVET will function as the REALifelines lead for their assigned state, coordinating the cooperative structure and processes for REALifelines activities among all partners. The nationwide network of Career One-Stop Centers is integral to the success of REALifelines. One Stop staff, particularly DVOP specialists, are uniquely trained and ideally located to provide specialized and

intensive services at the local level. Various resources provided by supportive service organizations, are available at the national and state level.

8.14 **VOPAR** (*pending- will link to revised VOPAR User Guide*)