



VETERANS' PROGRAM LETTER NO. 02-12

MEMORANDUM FOR: ALL VETERANS' EMPLOYMENT AND TRAINING
SERVICE COMPETITIVE GRANT RECIPIENTS

FROM: ISMAEL ORTIZ, JR

A handwritten signature in black ink, appearing to read "Ismael Ortiz, Jr.", written over a horizontal line.

SUBJECT: Competitive Grants Quarterly Reporting Guidance

- I. **Purpose:** To provide guidance on submission of quarterly fiscal and performance reports for all Veterans' Employment and Training Service (VETS) competitive grantees.
- II. **References:** Workforce Investment Act Section 168; Title 38 Code of Federal Regulations (CFR) Sections 2021 and 2023; 29 CFR, Part 95, Grants and Agreements with Institutions of Higher Education, Hospitals and Non-profit Organizations; 29 CFR, Part 97 (A-102), Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments; 2 CFR 220 (A-21), Cost Principles for Educational Institutions; 2 CFR 225 (A-87), Cost Principles for State, Local, and Indian Tribal Governments; 2 CFR 230 (A-122), Cost Principles for Non-Profit Organizations; and the most recent version of HVRP and VWIP Special Grant Provisions issued with the Notice of Obligation.
- III. **Background:** VETS competitive grantees are required to submit quarterly fiscal and performance reports to comply with the reporting requirements of the grant to facilitate the legislatively mandated grant oversight responsibilities of VETS' Grant Officer Technical Representatives (GOTR). VETS monitors reports submitted by the grantee to ensure funds are expended in accordance with cost principles established for Federal awards and determines if performance is within the planned goals. In order to meet the reporting requirements grantees are required to have access to the Department of Labor's Grantee Reporting System (GRS), for submission of the Standard Form (SF) 425, Federal Financial Report (referred to as the FFR throughout this VPL), and access to the VETS Operations and Programs Activity Report (VOPAR) for submission of performance reports. **Any grantee that does not have access to either of these two reporting portals should contact the appropriate Grant Officer's Technical**

Representative (GOTR) as soon as possible.

IV. **Grant Administration:** The State Director for Veterans' Employment and Training (DVET) or other designated VETS representative serves as the GOTR for grant monitoring and oversight. The GOTR is authorized to approve:

- Technical changes not involving a change in the scope, cost, or conditions of the grant award agreement;
- Quarterly Technical Performance and Financial Status Reports;
- Corrective Action Plans; and
- Certain budget line item deviations requested by the grantee up to the limit specified in the Special Grant Provisions.

V. **REPORTING REQUIREMENTS**

A. The grantee must submit certified electronic quarterly fiscal and performance reports via GRS and VOPAR. Complete and accurate reports are due no later than 30 calendar days after the ending date of each program year quarter during the active performance period:

- 1st Quarter by no later than October 30th;
- 2nd Quarter by no later than January 30th;
- 3rd Quarter by no later than April 30th;
- 4th Quarter by no later than July 30th;

As well as for the follow-up performance period:

- 5th Quarter by no later than October 30th;
- 6th Quarter by no later than January 30th;
- 7th Quarter (Final) by no later than April 30th;
- FFR Closeout within 90 days of certifying a final FFR.

Note: Early quarterly report submissions are strongly encouraged to avoid late reports that require corrections after the required due date.

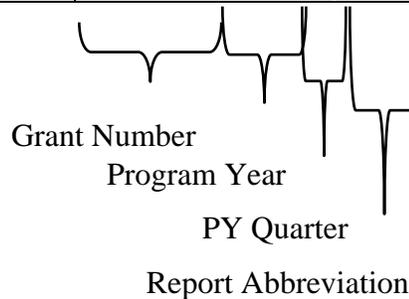
B. All pages of the reporting documents submitted by grantees must include the appropriate grant number.

C. Between scheduled reporting dates, grantees will immediately inform the GOTR of any significant developments affecting their ability to accomplish submission of the quarterly reports. GOTRs will provide grantees with necessary technical assistance to address these and other issues as needed.

- D. Grantees must request through the GOTR any changes to previously reported performance data in VOPAR. The GOTR will review the request and if in agreement forward the request to the regional office. The Regional office will request that the National Office reopen the affected quarters of the grant period for editing. Once that is done, the grantee will edit and finalize the data and the GOTR and the region will have to review and approve the data within VOPAR. For each affected quarter, a period of one week will be provided to complete this workflow.

VI. Report Content and Submission: All components of competitive grant quarterly reports are submitted electronically into either the Department of Labor’s GRS reporting system or the VOPAR reporting system. Submissions to the VOPAR system require data entry or attachment of documents as described below. All documents submitted to VOPAR will be saved following a standard naming convention illustrated in the table below using a fictitious PY 2011 grant awarded as grant number HV-12345-11-60-5-12. Only one document per program year and quarter will be accepted for the documents listed below. Any corrected document uploaded will replace the previously uploaded document of the same type.

File Type	File Name	Format
Technical Performance Report	HV-12345 PY11 Q1 TPR.xls	MS-Excel
Technical Performance Narrative	HV-12345 PY11 Q1 TPN.doc	MS-Word
Corrective Action Plan	HV-12345 PY11 Q1 CAP.doc	MS-Word
Success Stories	HV-12345 PY11 Q1 SS.doc	MS-Word



A. Financial Reports: The FFR can be saved in the GRS but will not be submitted for acceptance by the GOTR until it is certified by the grantee. All financial information must be submitted utilizing the electronic FFR via the GRS no later than 30 days after the end of each program year quarter at: http://www.eta-reports.doleta.gov/cfdocs/grantee_prod/reporting. Separate FFRs must be submitted for each grant year and identify appropriate financial information for the grant year reported.

Closeout FFR: A Closeout FFR certifying all expenditures are final must be certified no later than 90 days after an FFR is marked “final,” but no later than 90 days after the 7th quarter FFR “marked final” is submitted.

B. Quarterly Performance and Expenditure Data: Grantees must enter quarterly

data for each grant year utilizing the VOPAR system web site at <https://vopar.doleta.gov>, using the 'Enter/Edit Actuals' link. The data to be entered comes directly from the "VOPAR Reporting" and "VOPAR Demographics Summary" worksheets of the Technical Performance Report (TPR) described below. The data can be saved but it will not be submitted to the GOTR for review and approval until it has been finalized by the grantee in VOPAR.

- C. Technical Performance Report (TPR):** The template for the TPR is available on the VETS website at: <http://www.dol.gov/vets/programs/common/main.htm> under VOPAR Forms. The TPR must be uploaded in the VOPAR system as a Microsoft Excel workbook. Use the applicable "Attach Narratives" link in VOPAR to select the grant, program year and quarter under which the document should be uploaded. The name of the grantee, grant number, and total grant award amount must be included on the worksheet labeled "VOPAR Reporting." The period of performance dates must reflect the program year dates covered plus the three quarters of follow-up.
- D. Technical Performance Narrative (TPN):** The TPN must be uploaded into the VOPAR system (required in Microsoft Word). The first page of the narrative must include the grantee name, grant number, and the period covered by the report. The TPN must contain:
1. A comparison of actual performance to established goals for the reporting period, quarterly and cumulative, and response to any findings related to monitoring efforts. This comparison will be on the same level of detail as specified in the program approved in the grant document. It will address quantifiable as well as non-quantifiable goals.
 2. If established goals have not been met, a Corrective Action Plan (CAP) may be required. See Section VII below for guidance related to a CAP.
 3. Other pertinent information, including a description of grant-related activities occurring during the report period. This may include personnel activity (hiring-training), community orientation/awareness activity, and programmatic activity (job development). The TPN should also identify administrative and programmatic problems, which may affect performance and proposed solutions.
 4. The grantee must include a statement attesting to the completeness and accuracy of the quarterly reports submitted to the GOTR.

The 7th quarter (final) report must include:

1. An explanation of any participants who were placed into employment during the grant period and were no longer employed at the end of the follow-up period; and

2. Any beneficial suggestions to improve the overall program.

E. Success Stories: When submitted, success stories must be uploaded into the VOPAR system as an attachment (required in Microsoft Word). The first page of the document must include the grantee name, grant number, and the period covered by the report.

F. Evidence of Compliance with the Quarterly Reporting Requirement: In order to be considered in compliance with the quarterly reporting requirement identified in Section V.A, each grantee must complete the following steps by the date specified in that Section:

1. Upload the Technical Performance Report (TPR) in accord with Section VI.C;
2. Upload the Technical Performance Report Narrative (TPN) in accord with Section VI.D; and
3. Enter and finalize the Quarterly Performance and Expenditure Data, in accord with Section VI.B.
4. Submit and Certify the FFR in GRS in accord with Section VI.A.

Any grantee that has not completed all four of the above steps by the date specified in Section V will be considered to be out of compliance with the quarterly reporting requirement and may be subject to corrective action.

VII. Corrective Action Plan (CAP): Grantees are accountable for meeting the fiscal and performance goals approved by the Grant Officer. GOTRs will require a CAP for the following reasons:

- Late reporting – any two quarters of fiscal and/or performance reports not being submitted as certified on or before 30 days after the end of the program year reporting quarter;
- Inaccurate Reporting - Two quarters in which there have been two or more errors in fiscal and/or performance reporting elements;
- Non-Compliance Issues – Non-compliance with the terms and conditions of the grant award to include pertinent VPLs, CFRs, General Grant Provisions, or Special Grant Provisions;
- Poor Performance - Failure to meet any one or more of the following critical performance outcomes in any of the first three quarters of the grant period:
 - **Enrollments** – the cumulative enrollments through the end of the reporting quarter divided by the cumulative enrollment goal through that quarter;
If the percentage of actual enrollments is less than 85% of the planned

enrollments, a CAP is required.

- **Placements** – the cumulative placements through the end of the reporting quarter divided by the cumulative placement goal through that quarter;

If the percentage of actual placements is less than 85% of the planned placements, a CAP is required.

- **Placement Rate** – a comparison of the actual placement rate through the reporting quarter to the planned placement rate through that quarter;

If the actual placement rate is more than 15 percentage points below the planned placement rate, a CAP is required.

- **Cost per Placement (CPP)** – a comparison of the actual cost per placement through the reporting quarter to the planned cost per placement through that quarter.

If the actual cost per placement is more than 15% greater than the planned cost per placement, a CAP is required.

The critical performance outcomes listed above will be evaluated for the purposes of a CAP. However, grantees are still accountable for meeting all of the fiscal and performance goals approved by the grant officer.

- A. Notification:** When the need to initiate a CAP *for any reason other than poor performance* is identified, the GOTR will send a notification (e-mail notification is acceptable) to the grantee identifying the non-compliance issue(s) to include a timeline for submission of an acceptable CAP. When the need to initiate a CAP *for poor performance* is identified, the GOTR will notify the grantee that a CAP must be submitted. The notification will identify the critical performance outcomes that have not been met, and provide a timeline for submission of an acceptable CAP.

NOTE: The CAP should be approved in VOPAR no later than 45 days after the end of the applicable program year reporting quarter.

- B. Submission:** The grantee must upload the CAP (as a Microsoft Word document) in VOPAR within the required timeline. The first page must include the grantee name, the grant number, and the grant year. An acceptable CAP must include:
 1. The critical goals that have not been met, or other issues that made the CAP necessary;
 2. An explanation for poor performance or other issue(s);
 3. Actions that will be taken to correct the issue(s), and/or performance;
 4. A timeline for implementation of the corrective actions; and
 5. A timeline for anticipated improved performance in the critical areas or resolution of other issue(s).

- C. Acceptance:** Once the CAP is acceptable, the grantee will upload it into VOPAR. The GOTR will use the VOPAR system to request regional approval. The region should approve the CAP no later than 45 days after the end of the applicable federal reporting quarter. If the GOTR does not find the CAP to be acceptable he/she will provide additional technical assistance and work with the grantee to develop an acceptable CAP.
- D. Follow-up:** The grantee must maintain monthly contact with the GOTR, telephonically or by email, for assistance to review up-to-date financial and programmatic performance and grantee progress in resolving issues. If the issues necessitating the CAP are resolved/corrected within the next two reporting quarters the GOTR will access VOPAR and request regional approval to remove the CAP in VOPAR. If the region concurs, responsible regional office staff will remove the CAP in VOPAR.

If grantee performance does not improve to an acceptable level within two reporting quarters or if the other issue(s) are not resolved, the grantee will be designated as a High Risk Grantee. Grantees so designated run the risk of not being recommended for optional year funding.

VIII. Optional Year Funding: Should Congress appropriate additional funds for this purpose, VETS may consider up to three (3) additional years of optional funding under the proposed grants. The Government does not, however, guarantee optional year funding for any grantee. In deciding whether to exercise any of the three option year(s) of funding, VETS will consider grantee performance during the previous period of operations as follows:

The grantee must meet, at minimum, 85% of planned cumulative quarterly goals by the end of the second quarter of the current Program Year for:

1. Enrollments;
2. Placements;
3. Placement Rate; and
4. Cost Per Placement

Upon notification of award, grantees should contact their GOTR to ensure they fully understand the performance requirements and their relationship to the potential to earn an additional option year of funding based upon acceptable levels of program performance.

In deciding whether to exercise any optional year of funding, VETS also will consider grantee performance during the previous period as follows:

1. If a grantee does not meet the criteria described above, VETS is under no obligation to fund a grantee for any optional year of funding;

2. The grantee must have complied with all terms identified in the SGA, the grant award document, and the General and Special Grant Provisions, as verified by the GOTR;
3. All program and fiscal reports must have been submitted by the established due dates and the grantee must verify these reports for accuracy; and
4. All issues related to performance measures not in compliance that resulted in a Corrective Action Plan (CAP) at any time during the program year (PY) must be addressed to the satisfaction of the GOTR.

IX. Review Analysis and Recommendation: Prior to submitting quarterly reports the grantee will review and analyze all reports and related documents to ensure that they are complete and accurate. It is also highly recommended that grantees provide GOTRs with a copy of the FFR and all reporting documents for review PRIOR to submission to the GRS and VOPAR.

After the electronic submission of reports, the documents will be reviewed and approved by the GOTR and the appropriate Regional Administrator for VETS. Upon notification that a report has been approved at the regional level, grantees must submit a signed, hard copy of all documents to the Grant Officer at:

**Department of Labor
Procurement Services Center
200 Constitution Avenue NW, Room # S-4307
Washington, DC 20210
Attn: Cassandra Mitchell**

X. Actions Required:

- A. Grantees are encouraged to meet with their GOTR to obtain technical assistance and training on the reporting process.
- B. Grantees will submit all electronic and hard copy reports in accordance with the due dates, file format, and file naming conventions described above.
- C. GOTRs will review electronic submissions to ensure all reports are correct and error free and approve reports in GRS and VOPAR after any anomalies are corrected.

XI. Inquiries: Grantees should refer questions to the appropriate GOTR. GOTRs should refer questions or issues that cannot be resolved to the Regional Administrator.

XII. Expiration Date: Until superseded or rescinded.