

Workforce³One

Transcript of Webinar

Round 2 TAACCCT Virtual Conference

Grant Closeout

Thursday, November 5, 2015

*Transcript by
Noble Transcription Services
Murrieta, CA*

ERIC BELLINO: And then to go over the agenda today I'm going to turn it over to Cheryl Martin. Cheryl?

CHERYL MARTIN: Hi. This is Cheryl Martin. I am the TAACCCT grant manager for TAACCCT and we're so delighted to have you here today.

With me today is Kevin Brumback, and some of his colleagues. We'll be talking about closeout. He'll introduce them when we get to that section of the slide.

The topic today is grant closeout, but as you may know this is one in a series of five webinars. It started yesterday, today, tomorrow, and next Monday and Tuesday. Tomorrow and next week we'll be talking about sustainability, parts one and two. On Monday we'll be talking about SkillsCommons and posting deliverables there. But today we are going to focus on closeout.

You are ahead of the game because you are here talking to us about this now, and we have practically a year from now until we get to this point, so that's great. It is very helpful, though, to know what to expect coming down the road.

So I wanted to start talking about a couple of other things before I turn it over to Kevin and his colleagues. I want to talk about our legacy a little bit, some things about performance reporting at the end – which is not to be confused with the performance reporting that you are doing right now – and then we'll talk every briefly about submitting grant products and deliverables, although most of that will be covered on Monday's webinar. And then as somebody said, who gets all my stuff? That's Kevin and company's part.

So I wanted to call your attention to some handouts in the file share before we get started. These handouts will also be posted on the TAACCCT CoP under grants management and then Round 2 closeout. There's a link for it on the last slide when we get there. The items that we have there – of course, a copy of the PowerPoint slides – we have an FAQ document, "Closeout FAQ Round 2," which I think you'll find helpful and has even more information than what we're saying on the call today.

There's a short one-pager that's called "Strong Finish." Then there are the two letters for reference. One of them is the Round 2 extension of your period that you can use grant funding for program activities. That's your letter for Round 2.

Then I also wanted to say that I included the letter for Round 3 because that explains some additional things. Even though it says it's for Round 3 it's relevant to you as well. It's sort of a different way of saying the same thing. So those may be helpful to you as we go forward.

So let me turn to, very briefly, talking a little bit about what our legacy is. There are so many good stories and successes out of Round 2. It's really terrific and we definitely want to capture

those. So we sent our an email – today, I believe – that asks essentially the same thing as this slide, so I'm not going to read through this.

We're looking for, as you have them, whether you have them now or going forward, anything that you've developed that would tell your story, whether it's a video or a brochure or a brag-book or whatever you want to call it. Please just always remember to flip a copy of that to the TAACCCT mailbox, along with sharing it with all the other people that you share it with.

We have these questions up here; again, they're in the email. We would encourage you to let us know if you have thoughts about those that you'd like to share with us. Of course we have what you've already shared in your annual reports and your quarterly reports, so this is maybe a little bit of a different way of looking it. And it's, of course, totally optional.

Finally, in terms of sharing your successes, you should have seen yesterday an email – yesterday or the day before – about convening in early 2016 for TAACCCT. We asked people to submit – a call for presentations and submit presentation proposals to us. We're particularly interested in those for Round 2 grantees. I've had a few questions from folks saying, are you going to let Round 2 grantees come to this meeting, and will it be before March 30? And so on.

We're definitely working on a schedule that would make it possible for you to come. That is our goal anyway, although best laid plans sometimes. But we want to have at least some of the Round 2 grantees there as presenters and as mentors. So if you are interested in sharing your story that way, please send us a proposal.

OK. We'll go to the next section. I also just wanted to say that we'll take questions, look at them from the chat. If you have questions, type them in there and we will take as many as we can. But if we don't get to your question today or if we didn't answer it adequately for your needs please just send it to the TAACCCT mailbox and we'll handle it that way.

All right. Thank you. Let's move into final performance progress reports and other numbers and a couple of heads-up here.

First of all, just a couple of other things I wanted to mention. There are some data validity issues that we've noticed with some of the Round 1, 2 and 3 grantees. So after these APRs are closed out we will be sending some of you letters that say, hey, we're not sure if there's an issue here but it looks like maybe there – you know, this doesn't match that or something like that, and ask you to go back in and fix those. That will be coming out sometime after the first of the year, probably.

And also, Urban Institute, who is doing a national evaluation, will be sending out a grantee survey to all the different rounds, including Round 2 at some point; again, probably into 2016 is my guess.

I also wanted to note that if any of you were on the webinar on June 24, 2015 about Round 2 closeout, what you hear here supersedes what was provided in that webinar.

All right. I already talked about the file share, so we're going to just jump in here. Few things to note about your final performance report. Again, this is not the report you're doing right now. This is the one that you'll be doing next year around this time.

The last quarterly progress and annual performance reports will serve as your final performance and outcomes report. The final QNPR will be both quarterly and cumulative. The final APR will provide – just like all these other years – only the information on the grant activity for the one-year period that you're reporting on. The final one will be October 1, 2015 to September 30, 2016.

In terms of aggregating that, the system has these thermometer reports that add up all your numbers, so that's where you and we would see the cumulative data across all four years. It's really important not to report cumulative data in any of your individual reports because then the thermometer will be wrong. So if for some reason somebody has done that, just contact your FPO, ask them to reopen your reports, and you can go back in and fix those.

When do you report for your final progress report? Not later than 45 days after the end of the reporting period, so just the same as it is for all of the other reports. In 2016 that date – the magic number – will be November 14. Both your QNPR and APR will be due then. Like this year, I'm sure you're finding it that these last days are very busy, so keep that in mind. We'll talk in a moment about how to do corrections if after that point in time you realize there's sometimes that needs to be corrected.

What you should report at that time. In your quarterly narrative you want to put information on grant activities during the last quarter and cumulative information. So for instance, you can say, this quarter – and there's an example there for Section C – one new employer was interested in continuing to hire graduates and seven employers total hired graduates throughout the grant period.

However, when you get to the annual performance report, as I said before you will only be reporting on your fourth-year activities, in addition to any activities that occurred during the closeout period, which is mostly going to be placement at that point. Although, if there's something else that needs to be corrected you can do that then, too.

So as we've said all along, grantees are to use the fourth year as kind of a follow-up year or the one where you do your evaluation and that kind of thing. We did send out the letter allowing the first six months of that to continue grant-funded program activities and moving – the final six months for follow-up. But either way, you're only going to submit your report one time, and the final APR would be submitted on November 14, 2016.

Continuing on that, I think we've said this already – the final APR will reflect the activities for that one year – sorry, wrong slide.

The first six months of the annual performance report, as we've said, you can use those to continue grant-funded program activities. If you do choose that option, you can continue to report on all your outcomes in B1 through B10 for the first six months of the final year. So

anything that you would normally report in B1 to B10, if it happened during those six months then you can include that in your final report.

If it happened during the final six months, then you're only going to be reporting on the follow-up outcomes that happened during that time. So for fields B7 to B10, you can use information that happened between those final six months but only if it fits into B7 to B10.

If you didn't choose that option and you're using your whole last year as your follow-up year, then you should report only on follow-up outcomes B7 to B10 for that entire 12 months.

In terms of supporting documentation it's the same as it has been before, but you'll want to have participant and financial records to support the aggregate data that you submitted and to show that your participants were prior to the end of the 42nd month – that's the six months into the fourth year period.

As we've said in the letter, no grant funds can be spent on programmatic activities in the final six months of the grant; and only outcomes paid for with grant funds may be reported in your APR. I do want to say that that refers to program development or delivery.

If we are talking about evaluation activities, those can be paid for in the last six months. We'll get to this in just a minute, but if we're talking about preparing your deliverables for posting on SkillsCommons or getting them reviewed for that purpose or actually doing the posting on SkillsCommons, that can happen in the final six months as well and can be charged as a grant-funded activity because it's not considered program development or delivery.

So a few questions here. "What if we achieved additional outcomes during the closeout period?" So now we're talking about the 90 days after the grant period. Your grant period ends September 30, 2016; and as Kevin and company will get into in a moment, you have 90 days after that for the closeout period.

What happens if, for instance, we have a student who completed during the grant period but they found employment during that 90-day closeout period? Because we know there's always lagging on that. Or even if they completed and found employment before the grant ended but you only found out about the employment during those last 90 days because it takes a long time sometimes to get that information? Yes, you can go back in during that final 90-day period and essentially unlock your report and add those additional employment numbers and that kind of thing. So that is possible to do during that time.

Outcomes that are achieved during the closeout period after grant period ends should be reported in items B7 to B10, because we're only talking about follow-up outcome measures there. Those are the only places that you would change if you are adding some follow-up outcomes during the grant closeout period.

Finally, if you want to know what the total numbers are – your cumulative numbers – and know what we're going to see as your cumulative numbers, if you haven't done this yet – and by now I'm guessing all the Round 2 grantees have, but every once in a while we find somebody who's

not familiar with this yet, or if you're new to this position, maybe – the thermometer report – which is explained how to find it is in that link there – that will sum up all four of your annual reports, all your figures from all those annual reports, and show you overall cumulative numbers.

That's also a good way to do a double-check. If you go in and look at the thermometer report and see what it says, and if it doesn't match your internal records for cumulative numbers then you should go back and fix your reports to be correct.

OK. I'm going to speak very briefly about the product submission process here. As I said, there's a whole webinar about SkillsCommons and how to post things there. These same slides will be in that webinar as well, so I'm not going to go into the details here except for on one slide. I left them in here so that you have a complete record of all of these things when you come back to this grant closeout business down the road.

I did want to draw special attention to slide 24, which is an FAQ that says, "Are activities and costs related to reviewing and posting deliverables allowable during the final year or six months, in the case of those who are choosing to extend the grant-funded activities into the first six months of the final year?"

Costs related to reviewing, including your third-party reviews, finalizing – you know, if they did a review and then you want to tweak your curriculum based on something they said could be better – and posting those grant deliverables, like curriculum and course materials and all of those other things that you want to post on SkillsCommons – costs related to doing that are not considered program development or delivery. Therefore, you can continue to incur those costs should you have those throughout the entire grant period. You don't have to stop at six months out for those particular things like you would for training and classroom delivery and developing the curriculum and all those other costs like that.

OK. So now we are on the grant closeout process – OK. I do have one question here. Let me see whether this is something that we can answer now. Just one moment. (Pause.)

Yes. So we have a question that says, "Does this mean that" – and Eric, if you want to put that question into the box up there so everybody can see it, but meanwhile I'll read it – "Does this mean if a participant obtains employment after September 30, 2016, we can count that in our reports in November 2016? Or do you mean that they get employment before the grant ends but we get the information after the grant ends on 9/30/16?"

Yes. That's right. The issue here is that sometimes people complete and get their employment before the grant ends but you don't find out about it until afterward. That's where you can count it.

OK. I am going to move over to Kevin and your team now. Go ahead and introduce the folks you have with you, please.

KEVIN BRUMBACK: Great. Thank you, Cheryl. Hi. My name is Kevin Brumback. I'm in the Division of Policy, Review, and Resolutions. I'm joined today by my closeout colleagues

Avery Malone, who's a closeout grant officer on the closeout team; and also Merin Asafa, who's the current closeout grant officer and team lead for the team.

I was former closeout grant officer and I have also been around TAACCCT for a while. I was under Maggie Ewell in the policy unit when TAACCCT was just getting started. So I've been with you in the TAACCCT grants for a while.

Before I get into my presentation I just want to thank you all for the hard work that you guys have been doing to serve trade-affected workers the last few years with your grant, and also for serving those that need our services through this grant and with connections to the One-Stop system. As a high-profile initiative I think that sometimes folks in the national office – especially in the financial side of the house – sometimes forget all the great work that you guys do on the program side of the house. So my thanks to you and my thanks to Cheryl and her team for shepherding these grants through. Just wanted to say that because that often goes unsaid.

MS. MARTIN: Thank you, Kevin.

MR. BRUMBACK: So what is grant closeout? Grant closeout is the completion – the end of the grant life cycle. It starts, of course, with the award of the grant. The middle term is the conducting of the grant activities and then it ends with grant closeout.

The regulations that cover grant closeout are described in 29 CFR 95 Subpart D and 29 CFR 97 Subpart D as well. You guys, as you know, you're institutes of higher education, so you guys have been following 29 CFR 95 for issues related to Uniform Administrative Requirements, and you're also been following 2 CFR 220 for allowable cost principles.

And at any time if I am speaking too slowly, too softly, too loudly, please send in a note and I'll be happy to adjust accordingly.

And you may be asking, so why do we close a grant in the first place? Well, it's required by the regulations. But also it serves as the official record of what happened during the grant, not only on the performance side that Cheryl and her team oversees, but also the financial side, which is what Merin and Avery and their team oversee.

And it also serves to – on the programmatic side it shows the effectiveness of the program, the participants served, the products delivered, etc.; and on the financial side, the amount of funds that have been spent and the amount of funds returned to the Treasury after the grant.

Little bit about who we are. Again, I am in the Division of Policy, Review, and Resolution. Most recently I was in grant closeout; now I'm in audit resolution. Merin and her team are in the closeout team within the Division of Policy, Review, and Resolution. It's led by Merin and her team of seven resolution specialists. I'll talk a little bit more about the resolution specialists and the grant officer as we go.

We close out all grants for ETA and we're absorbing more grants throughout the department every day. But at the moment we close out approximately 700 to 1,000 grants a year. June is our busiest month; in 2014 we closed out 330 alone.

We'll talk a little bit about the closeout timeline. The closeout team, we track our workload one year out, so you guys have been on our radar for a while now.

A little bit how as we approach the period of performance end date. So about two months prior to the period of performance end date of your dates – which as Cheryl mentioned will be September 30, 2016 – the closeout office will be checking with Cheryl's team and with the closeout grant officer – who I believe is still Steve Rietzke – be checking with you guys just to make sure that all these grants will be closing – will be ending September 30th. If not, Cheryl and Steve will be notifying closeout that some may be getting extensions, etc.

MS. MARTIN: There are no extensions. (Chuckles.) I'm serious. That's what we've said all along, and there will not be any of those. So it will be September 30th.

MR. BRUMBACK: Having said that – a little bit before that, about two weeks before the end of your grant a specialist will be reaching out to your organizations with what is called the initial closeout verification letter. I have a sample of what that looks like and a little bit about our process.

Each grantee will be assigned a particular specialist who will shepherd you through the grant closeout process from beginning to end. All of those specialists are under Merin, who's the closeout grant officer.

Little bit about timelines. One of the common questions that we get here in closeout is what is closeout, how long does it take, what are the different timelines? You guys, as you know, end on September 30. So 45 days after September 30 you must submit your final quarterly 9130 report.

You guys are very familiar with the 9130 because you've been submitting them these last few years throughout, and in closeout there's not much difference. You will have a final quarterly 9130 submitting by I believe it's November 15th. I have that on one of my next slides.

Then about 70 to 75 days after the period of performance end date, the specialist will be following up with you to make sure you submit your last 9130 report as well as additional documentation – which I'll discuss in a moment – that needs to be submitted with the rest of your closeout package.

And as I mentioned, 90 days is the next critical date of deadlines. Ninety days after your grant ends – I believe that's December 30, 2016 – you guys have to submit your final, which we call the closeout financial report, as well as some additional documentation which I'll touch on in a moment.

This slide is just for your reference. This slide shows the documentation that your office will have to submit to the closeout unit prior to completion of the closeout process. As I've already

mentioned, it mentions the two 9130 reports, the grantee's release, the government property inventory certification form, the grantee's detailed statement of cost, and the assignment of refunds, rebates, and credits and the closeout tax certification.

And in case I forgot to mention, as we go if you have any questions feel free to keep entering them just like you have been on your screens and we will have them pulled on here so that we can see them internally. I can either answer questions at the end or answer questions as we go, but this session is really for you so I want to make sure I get to as many of your questions as possible.

So what's the magic that happens after those first 90 days? Why does it take so long between day 91 and the months later to finally close out your grant? Well, there's a lot of reconciliation and compliance that the grant staff is looking for. We're verifying the information that's been submitted by you guys that's required from your closeout packages. We're making sure we have all those materials.

We're working with you to process budget modifications. We're working with you to obtain your final indirect cost rates. We're still doing a lot of stuff that happens and sometimes our management here does not understand what takes so long with grant closeout. But it is more complicated than it's often given credit for. But we know we won't have any problems with you guys because you guys are one of our better grantees and you've been drilled with all the requirements since you guys have started.

A little bit about this slide. We actually technically, according to our Department of Labor manual series, we get one year after the period of performance ends to close the grant. We aspire to beat that deadline. We are roughly right around nine or 10 months after the period of performance ends and all of our grants close.

I don't really want to talk about the new uniform guidance because that's not going to apply to any of you guys in Round 2 TAACCCT grantees. The new uniform guidance gives closeout unit actually a little bit longer than one year – I believe it's one year and 90 days – to close grants. But again, we aspire to close them much quicker than that; roughly nine months after period of performance ends.

So a little bit about the deadlines again. As Cheryl asserted, the grants are all going to end on September 30, 2016. The grant will expire and the closeout process begins. I know Cheryl mentioned that – she said the closeout process is 90 days and the FAQ you received also says 90 days. That's not technically correct. Grant closeout really just ends when it ends. It can be anywhere from three, four months; can be up to nine months or a year. There's really no hard number for 90 days as far as how long grant closeout takes.

November 15th is when your final quarterly 9130 is due. December 30th is when your closeout 9130 is due. I'll show you a screenshot of those two so you can see what I'm talking about. You're certainly familiar with your quarterly 9130s. The closeout 9130 is just an additional 9130 that is submitted. It's the last one that you submit. It's not one you're familiar and you can trust it looks almost the same.

One other thing about December 30 while we're on this slide. December 30th will also mark the last day you can draw down funds without permission. As you know, you've been drawing down funds to pay your grant-related costs on a timely basis throughout the life of your grant; preferably within about three days of when you actually need the funds.

So December 30 marks the last time you'll be able to draw down funds without permission to liquidate obligations. At that point there may be opportunity to draw down funds but the account will be locked in PMS and you'd have to request permission to do so.

This is a screenshot of a notification letter. Don't worry if you can't read all the words on there. It's just a screenshot sample of what you'll actually be getting from your closeout specialist. I referenced this a little bit earlier in my presentation. This is the letter you'll be getting about two weeks before your grant ends. It references the specialist that will be working with you.

It references that you'll be given access to the grant closeout system. It's a separate system not in e-Grants or not related to e-Grants that you'll – where all the grant closeout documents reside. It gives you access to that system and, again, the specialist who you'll be working with through your closeout.

You'll also be given an email – provided with the user manual for the grant closeout system. It manually (sic) walks you through how to actually use the system, where you can find documents, how you submit documents, etc.

The submission confirmation letter. After you've completed the grant closeout documents required in the grant closeout system, a submission confirmation letter will be sent to the specialist in the closeout unit to alert them that you've completed those documents. This does not include your 9130s. Those are in your e-Grants system.

Preliminary settlement letter – hurray. This is actually the letter that you all aspire to get. This is the one that says, dear grantee, you have completed the grant closeout process and you are under no obligation from the Department of Labor at this time and we have obligation to you, and we go on our merry way.

But it does not on there some exceptions where – we do note that because the grant is closed that does not mean that you are not still responsible for returning refunds that you may be receiving. It means you're also still required to report on the equipment that you may be retaining. It means you still have to comply with any audits that may be going on with your organization.

It means, again, if you have any refunds, that those funds have to be returned to the Treasury. And you also are notified that if in the event it's later found there are disallowed costs associated with this grant, that we have the right to collect those funds from your organization. That's actually what I'm doing now in the audit unit, but I'm sure we won't have any problems with our colleagues in the TAACCCT program.

So a little bit about the element of your grant packages. This is actually a screenshot from the grant closeout system. This is what you'll be seeing when you go to log in to complete your grant closeout package. Again, this is not the 9130s. Those are housed in the e-Grants system.

So a little bit about the forms in the system. There's something called the grantee's detailed statement of costs. It's one of our important forms that we have in our system. That is actually a column-by-column comparison of what you are budgeted to spend and you're allowed to spend during your award and what you actually spent. And again, I'll have a screenshot of what that looks like.

There's a grantee's release. This release relieves ETA from any future financial obligations for your organization. This release is a standard boilerplate that we have for all of our grants.

There's a grantee's assignment of refunds, rebates, and credits. This certifies that you, to the best of your knowledge, have not received any refunds, rebates or credits that must be applied back to your award. And then in the future, if you do receive any of those funds, either through your organization directly or through any of your co-grantees, that those have to be applied back to the grant.

The – it's called the property closeout inventory certification form but it really is the equipment form. I'll talk about that in a moment when we talk about equipment.

There's the grantee's closeout tax certification that certifies that you paid all the applicable taxes in the city, state, and county in which your program resides.

There's the grantee submittal of closeout form. It's essentially an internal checklist that you maintain and you check off as you complete the documents.

Little bit about the 9130. This is a screenshot of a sample 9130; I know you guys are very familiar with this because you've been submitting these quarterly throughout the life of your grant, so this is nothing new here.

And on the far right, under the cumulative section, you'll see there's a little amount that's circled. That amount shows the cumulative amount spent under the grant so far – which in this case is 1245153 (sic).

Next screen is the closeout financial report. This is something that you haven't seen but you will see once you go through the closeout process. This is the closeout financial report that is to be submitted 90 days after the period of performance end date of your award.

You'll notice that the difference between – and of course, the amounts are still cumulative. In this screen the amount in the middle – again, that's small but it's circled; it's actually a little bit higher than the amount in the previous column. All that's showing is that there are times in closeout where – the closeout financial report measures your cumulative expenditures but it also captures the amount and difference between the final quarterly 9130 and this report, which is the closeout financial report.

So in this case it actually increased by a few thousand dollars. The reason for that is that the grantee was liquidating expenditures that occurred during that final quarter that weren't captured on the final quarterly. They can go up in cases like that. They can go up when your final indirect cost rate agreement comes through and you need to revise your quarterly report; it can make the number go up.

There are times when it can go down as well. Just wanted to show you that that is something you may not be as familiar with, but the grant staff will shepherd you through that process.

This is just a screenshot of the two side by side, just so you can kind of see the differences. Don't get confused; they look very similar. Again, the grant staff will help you as needed through that. I added this slide at Avery's request.

One more reminder is that sometimes grantees have a lot of anxiety, that they want to make their final quarterly 9130 perfect, to capture everything that they know of.

But just like all of your previous reports, that's as much information as you know and have at the time. There are things that are going to happen even after final quarterly. So if you know you're going to have liquidations that occur after that point, that's fine. You can capture those on your closeout 9130.

Liquidation of obligations. One of the questions we sometimes get is about obligations that occur after the period of performance ends. As you know, you only should be liquidating obligations that occur during the period of performance of your grant. As much as you'd like to continue serving your participants and helping America, unfortunately the grant closeout part of the story is really only liquidating the obligations that have occurred the life of your award.

And as Cheryl kind of touched on, for you guys a lot of the efforts will be done largely by the end of March 2016; so that by the time you get to grant closeout there shouldn't be much to be report or spend money on related to your award.

Again, you can still draw down funds during that time but you should only be spending funds on obligations that occur during the award of the grant.

One of the questions we get is, well, what about staff? What about the person that's actually going to be submitting these reports? What about the person that's wrangling the equipment; the person that still might be collecting performance-related information? Unfortunately those charges are just considered the cost of doing business and you shouldn't be charging those activities to the grant after the period of performance end date, especially if they're charged directly.

There may be some wiggle room in your indirect cost if those staff are in your indirect cost pool, and that's a little bit different. But just in general, know that just as you shouldn't be having grant-related activities occur after the period of performance end, the remaining funds shouldn't be used to pay for closeout activities.

I know that's especially not an issue with the TAACCCT folks because, as Cheryl and her colleagues have told me – Sharon before that – you guys will largely be a skeleton crew by the time September 30th, 2016 rolls around.

One of the things that we look on as terms of compliance is administrative costs. And as you guys know, these TAACCCT grants were funded with 10 percent administrative cost limitations, so that's 10 percent of the grant award amount. So we'll be looking at that closeout financial 9130, especially line 10f, which reports administrative expenditures, to make sure that's no more than 10 percent of the grant award amount.

And we'll also be looking at drawdowns. The grant closeout staff has access to PMS information, so they'll be comparing the drawdowns to the expenditures that you reported.

Little bit more about budgets and expenditures. This is a screenshot of the detailed statement of cost. This is a very important form for the folks in closeout. The column on the left shows – (technical difficulty) – this is the detailed statement of costs.

On the left side the cost category, or the approved budget categories that you guys were approved during your grant award. That middle column that says grant budget is the amount that you have been approved to charge against those approved categories. And on the far right is the cumulative cost, so what you actually spent against those approved categories.

Now, just like when you had your budget approved and you had budget modifications approved, the grant closeout staff will be looking to see that the amounts are either the same as what has been approved or within 20 percent line item flexibility, except for those that are salaries, wages, fringe, and indirect costs. Any changes that are above those amounts, they would have to come in for a budget realignment with the FPO.

Talk a little bit about budget realignment. As you know, you were doing budget mods throughout the life of your grant, and grant closeout is not much different. There is some wiggle room to have budget realignments. And as I just mentioned in my previous slide, if any changes in those line items that are 20 percent or more, you can request budget realignment through your FPO. The FPO will need to approve and then it would get sent to the grant closeout specialist. The grant closeout specialist would not approve it without the approval of the FPO.

Hold on one second. I have a question from the folks. I'm going to take a look at it. (Pause.)

The question is, "My Round 2 grant was extended for activities six months until March 31st, 2016. Are you saying that after that date there will be no salary paid by the grant?" If I understand the question correctly, they're talking about March 30, 2016, which is a full six months prior to what we call the end of the grant. So I don't think that's exactly what –

MS. MARTIN: No. What the deal is, the distinction is that before that six months you can do program development and delivery. That would be salaries for things like professors and teachers and instruction and student support services and all of that kind of thing.

After that six-month period you can charge salaries as long as they are not for program development and delivery. So there would still be presumably some project management; you're doing follow-up; obviously you're paying your third-party evaluator and that kind of thing. So it depends on what kind of salaries you're talking about, but it's not that all salaries are gone after that.

MR. BRUMBACK: Thank you, Cheryl.

This next slide talks about indirect costs. As you guys know, you have to submit indirect cost and approve an indirect cost rate agreement – or NICRA – to be able to charge indirect costs in these awards. Indirect cost is one of the more challenging and complicated things, I would say, that closeout staff has to work on, and TAACCCT will be no different.

As you know, there are consortia with – we won't call them subawards; they're consortia with co-grantees. As it's stated in the SGA, consortium leads and the co-grantees should have an approved indirect cost rate agreement. Although I won't speak to exactly how those will be handled during the closeout, I would say that the leads and the consortium members should all have approved agreements, but I will say arguably the most important one will be the lead's indirect cost rate agreement.

My preliminary conversations with the grant officer is that they'll be looking primarily at the leads to make sure that their approved rate is applicable and that costs have been allocated accordingly. And if I remember, for the TAACCCT grants specifically, the budget narrative to the 9130 specifies exactly who in the consortium or who in the grant is getting the administrative costs and how much.

I don't have much to draw on from Round 1 TAACCCT grantees, but we really haven't been getting many programmatic questions about indirect costs, so that's fortunately a good thing.

And we'll also be looking for any alternate methods. One of the things that likes to drive our boss crazy – Steve Daniels – is when grantees come in with an exotic way to charge indirect costs that is not a (federally ?) approved negotiated rate, but is something that is other than that. Now, those will be considered on a case-by-case basis, but I hope none of you – we won't get into that. (Chuckles.)

A little bit about property. I was just talking to Cheryl a moment ago about property. These grants are somewhat unique. I've been here in ETA since 2003; these are one of the programs that have the largest amount of property purchased under them.

As you guys, you used a lot of expensive, fancy equipment to do wonderful training for your participants. You also did not do capital expenditures, but you did a lot of work on your campuses to create training labs and provide wonderful advanced equipment. And as you know, we made you jump through a lot of hoops to get that equipment.

Now at closeout, all we're looking for is to, at this point, look to see how much of that equipment you still want to retain or you would like to dispose of. The equipment process is essentially two forms currently. I know Ron and I have talked about there may be slight modifications but we're not ready to talk about that yet.

The process I'm familiar with is the certification form. It's basically two questions. The first question is, I certify I have no piece of equipment that's worth \$5,000 or more; or yes, I do have equipment that is worth \$5,000 or more. In the event you do have a piece of equipment that is worth 5,000 (dollars) or more you have to complete a form that lists the product, the serial number, the condition, the purchase price, the fair market value, etc., etc., and how you either plan on retaining, selling, or scraping.

And again, we have samples of the form if anybody is anxious about property this far out. I can get the samples of the forms from Cheryl. But basically, be thinking – and it's on the handout we gave you on finishing strong – just be thinking about all that equipment, if you intend to keep it for grant-related purposes or if the needs of your community and the needs of your school completely shifted and there's no need for this equipment and it still is worth over \$5,000 or more. Be thinking about what you plan on doing with that.

Although I will give you a hint that will help the grant closeout process and help the grant closeout staff sleep at night. I will say that it might be in your best interest to say you do intend to keep it for grant-related purposes to use to continue to do fabulous things for the need in your community. I'll leave it at that.

Common misunderstandings. One of the things that we see – not from TAACCCT grantees, of course, but from other grantees that delay closeout or cause confusion – believe it or not, sometimes basically on their 9130 reports they show expenditures that are higher than the amount they've drawn down. How they were actually able to spend more than they were given, I don't know, but I think the confusion is they might be including leveraged resources or non-federal funds in that number. For our purposes, the amount of federal funds that you draw down and the amount you spend need to match.

One of the other problems we have is people completing the equipment form correctly – believe it or not, some people will check all the boxes, which did not clearly indicate what they intend to do with their equipment.

Some people misunderstand that all they need to do is complete the 9130s and they think they're done with closeout. Unfortunately they need to complete all those other important forms that I discussed earlier.

Common issues which delay closeout. Again, these do not apply to TAACCCT grantees, but believe it or not, some grantees sometimes are not as responsive as grant closeout staff would like. As I mentioned, we have a number of forms that need to be completed. We understand that you guys have a lot of things to wrap up. You have your co-grantees that you're working with, you need to reconcile your reports.

We understand that all these things take time. But non-responsive grantees who are in the twilight of the grant process are not always motivated to meet our deadlines. Our capable and stressed grant staff average about 100 grants to close a year, so they like to get things done as quickly as they can.

Refunds, I briefly touched on. As you know, you're still required with any federal funds that come back to the award, such as a rebate or credit, those need to be returned to us. I'm not going to talk much about the refund process, but it can be done by check or electronically through PMS, and the grant closeout staff will talk to you about how that's done.

Equipment disposition. Pretty self-explanatory, how you decide if you're going to keep the equipment, how you value the equipment. Those decisions take time.

9130 issues. That's pretty general. That just means sometimes we have people who don't understand the administrative requirements. Maybe they're having trouble with technical issues with the 9130 form. Maybe a staffer that used to do it has left and nobody knows how to do the system. All kinds of things delay closeout.

Administrative cost issues. Pretty clearly I've told you you've had a 10 percent administrative cost limit. Sometimes people confuse admin and indirect and may go over their admin limit.

Indirect cost, as I explained, is one of the more complicated things we have. Sometimes people are delayed in giving us their indirect cost rate agreement. Sometimes people want to wait for their final indirect cost rate, which is your right. That also does delay closeout process.

Question of disallowed costs. Again, that won't happen with you guys because you're fabulous grantees, but unfortunately when things go bad it leads to questions of disallowed costs and an initial determination. Final determination process, which is where I am now, and as of yet I have not yet had any TAACCCT grants to work on.

And budget realignments, as I mentioned, those also delay closeout, but they're an important part of the process as well.

I'm going to go ahead and skip the refund slide. That's just a bunch of references where we have the authority to collect refunds. It talks a little bit about why you have to submit your refund and where, but I've already covered that.

So let's talk a little bit about some frequently asked questions that we get here in closeout. You know you've been completing your 9130s throughout the life of your grant. "There's a box on box 6 that you've been marking "no" all this time, but if you've marked "yes" for your final quarterly 9130, does that trigger the closeout process?" Well, the answer is no, not really. All that really does is it allows you access to your final quarterly 9130, which will be your closeout financial report.

"My grant ends on September 30; when the grantee need to submit the final 9130 and the closeout 9130?" I inserted the answer for you guys right in there; November 15, 2016 for your final quarterly, December 30, 2016 for your closeout financial.

"When's the last time I can draw down funds?" As I mentioned earlier for you guys that specifically is going to be December 30, 2016.

"Can I use stand-in cost to pay for disallowed costs?" I'm sure that won't be an issue for you guys because you won't have any disallowed costs. However, yes, in the event that you do have disallowed costs, if you've been reporting stand-in costs throughout the life of your grant you may be able to use those costs to cover disallowed costs.

I know that was a lot of information delivered quickly. Cheryl, I can never seem to go any slower than that. We do have about five minutes left for questions. Our office, again, we have about eight folks that are on standby that can always help with the closeout-related questions. If I don't get anything today I'm sure you can funnel them through the TAACCCT mailbox or through my office or Cheryl's office and we'll be happy to get back to you.

MS. MARTIN: OK. So thank you.

I wanted to go to the next slide, which is actually the last one, while we're waiting to see if there are any other questions, to show you where a couple of references are.

The handouts that are in the file share section, the key ones, not the Round 2 and 3 extension letters, but the FAQ and the slides and the Strong Finish document, those three are in that top link there.

And as you know, there are many other resources for TAACCCT (accept ?), and on our community of practice page – which is the ETAganteesworkforce3one.org and then you click on "TAACCCT" – and then finally, the TAACCCT mailbox, which by now Round 2 grantees are very familiar with. It's the place to ask questions. Obviously you start with your FPO, but if you need to ask a question about something that you heard today or something like that, you can send it to the TAACCCT mailbox and copy your FPO.

So I am – Eric, do we have any other questions that have come in?

OK. Well, I'm not inclined to keep everybody here for another six minutes – or, well, at least for the whole part of that. I know, Eric, that you have a few other slides that you want – a few things that you want to do at the end. But I'm going to turn it back over to you, then – OK. Wait a minute. Sorry, we did get one. Here we go. Give us a moment, please.

OK. So we did get one question that is phrased thusly – although I will say that we're going to correct the way that this is phrased. So the way it was phrased was, "Are the closeout deadlines the same for Round 2 if we were given the six-month extension?"

OK. So you don't actually have an extension of your period of performance. You only have an extension of the ability to use program funds to fund grant activities. Instead of the 12 months you have six months on that. Your period of performance has always been four years, and it's just what you do during that period of performance that's restricted and the restriction was taken from 36 months to 42 months. So your period of performance still ends on September 30, 2016, four years after it began, and the closeout deadlines, therefore, all apply to that period of performance. And if that is still not clear, Arleta (sp), you can feel free to type in another question or else follow up with the TAACCCT mailbox.

All right. Well, thank you everybody. As Kevin said it's really, really amazing what TAACCCT grantees are doing with their resources and with their energy and their creativity. We're very excited to see what things will look like as you wrap up and we hope that you will tell us about your successes and make sure to share with us the things that you're sharing with everybody else that tells the wonderful things that you're doing besides those fun quarterly and annual reports.

We will look forward to continuing to work with you over the next month. Thank you so much for joining us today.

(END)