Compilation of TAACCCT FAQs

Revised as of: August 25, 2016

Frequently Asked Questions (FAQs) about the U.S. Department of Labor's

Trade Adjustment Assistance Community College and Career Training Grants Program

TAACCCT Grant FAQs – Table of Contents

I.   INTRODUCTION TO THE COMPILATION OF TAACCCT FAQS

Welcome to a new resource for Trade Adjustment Assistance Community College and Career Training (TAACCCT) Program grantees! This set of Frequently Asked Questions (FAQs) is a compilation of FAQs which were previously published, along with some newly published FAQs (clearly marked). Our goal in preparing this is to give grantees, Federal Project Officers, and others one central place to find the answers for many of the questions we've been asked about the TAACCCT program. This compilation was prepared by the TAACCCT Team at the U.S. Department of Labor (USDOL), Employment and Training Administration.

For each FAQ, the original publication source is noted at the bottom of each entry with the date and location for reference. For the most part, the FAQs in this compilation are identical to the originally published FAQs, though a few FAQs were eliminated for duplication, and a few were revised or added (as noted). We left in all FAQs previously published that are relevant to prior rounds even in order to be comprehensive even if they are no longer timely (e.g., those related to Solicitations for Grant Applications). However, we left out FAQs specific to Round 1 since the period of performance has ended.

Our intention is to issue periodic updates to this compilation, with new versions identified by date, and with any revisions or additions *for that version* clearly marked. Specifically, anything new in a particular revision will be shaded gray like this sentence.

It is also our intention that any FAQs published elsewhere be identical to those in this Compilation of TAACCCT FAQs. If there are any differences, the most recent version of this document takes precedence.

We need your help: As you can imagine, creating a compilation of FAQs is a large undertaking for a program as complex as TAACCCT, so if you discover differences among versions, or if you have additional questions you would like us to consider adding, please let us know at TAACCCT@dol.gov. Our ultimate goal is to make it easier for you as grantees to have access to the information you need to successfully implement your grants.

A.   General Information on TAACCCT Resources

There are many useful resources for TAACCCT grantees.

- A program overview, along with grant awards, Solicitations for Grant Applications, and related information can be found on the Department of Labor's website at: https://www.doleta.gov/taaccct/.

- The TAACCCT Learning Network (TLN) Community of Practice offers grantees technical assistance resources, information about events, and a space to share information with peers: https://taaccct.workforcegps.org/.

- The website www.skillscommons.org is the official repository for TAACCCT grant deliverables such as curriculum and related learning materials. On SkillsCommons, you will find free and open learning materials and program support materials for job-driven workforce development. The Open Educational Resources (OER) are produced by TAACCCT grantees – but anyone interested in workforce development training can reuse, revise, retain, redistribute, and remix them.

- For information on TAACCCT third-party evaluations, including national evaluations and the individual third-party evaluations required of each Round 2-4 grantee, start with https://www.taaccteval.org/.

- The TAACCCT Grantee Program Finder, hosted on the Department's Career One Stop website, allows for a search of TAACCCT grantees with information about consortium members and programs of study. See: http://www.careeronestop.org/taaccct/taaccct.aspx?ES=Y&EST=TAACCCT .

Grantee questions not answered on these websites or in the FAQs should first be submitted to your Federal Project Officer, generally through your consortium lead, if relevant. The TAACCCT mailbox is another way to get questions answered and to request technical assistance, peer mentoring, or other resources. We ask that you always copy your Federal Project Officer and include your grant name and number in the subject line when emailing TAACCCT@dol.gov.

II.   THIRD-PARTY PROGRAM EVALUATION REQUIREMENTS FOR TAACCCT

A.   General Information on TAACCCT Third Party Evaluations

1.   How can I get help with my third-party evaluation? The Urban Institute, as the TAACCCT National Evaluator, is also providing technical assistance for the grantee third-party evaluations. The Institute is hosting a Sharepoint website to disseminate useful resources, such as articles discussing evaluation methods and

program designs and evaluation examples in this field, provide access to archived webinars and other event information, facilitate peer-learning and discussion, and post important announcements, such as information on upcoming events. To gain access, please send an E-mail to the evaluation inbox at TAACCCTeval@urban.org. Grantees can also send evaluation questions to this E-mail address. *[Originally published in FAQ #1 from June 21, 2013]*

2.   Where can I find resources on evaluations? If you have general questions about evaluation that extend beyond the scope of the reporting requirements, you may wish to consult the following free resources available to assist you:

- Department of Labor, Office of Policy Development and Research Report, "Improving the Evaluation of DOLETA Pilot and Demonstration Projects - A Guide for Practitioners": http://wdr.doleta.gov/research/eta_default.cfm?fuseaction=dsp_resultDetails&pub_id=2445&bas_option=Author&start=1&usrt=4&stype=basic&sv=1&criteria=bell

- Department of Labor, Office of Policy Development and Research Report, "Review of Alternative Methodologies for Employment and Training Research": http://wdr.doleta.gov/research/eta_default.cfm?fuseaction=dsp_resultDetails&pub_id=2369&bas_option=Author&start=1&usrt=4&stype=basic&sv=1&criteria=bell

- National Science Foundation Evaluation Resource Center: http://evalu-ate.org/

- GAO report, "Designing Evaluations": http://www.gao.gov/products/GAO-12-208G

[Originally published in FAQ #1 from June 21, 2013]

B.   Submission of Third-Party Evaluation Deliverables

1.   What do I have to submit to USDOL with respect to third-party evaluations? Per the SGAs for Round 2, 3, and 4, both the interim evaluation and the final evaluation prepared by your third-party evaluator are considered deliverables that must be submitted to USDOL. If you specified other evaluation-related deliverables in your Statement of Work or evaluation plan, those must be submitted as outlined in your evaluation plan. If you have any questions about what is considered a deliverable please consult with your FPO. You must submit

the full versions of the interim and final evaluation as provided to you by your independent, third-party evaluator, including all attachments and appendices. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

2.   When and how do I submit third-party evaluation deliverables? Your final evaluation is due on the last day of your period of performance (September 30). Your interim evaluation and other evaluation-related deliverables are due on the date specified in your SOW or approved evaluation plan. However, we encourage you to submit any evaluation-related deliverables as soon as they are provided to you by your third-party evaluator. To submit these deliverables, you must send them to all three of the following: your FPO, TAACCCT@dol.gov, and taaccctaeval@urban.org. Please reference your grant name and number in the subject line of the email. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

3.   Am I required to post my grant's third-party evaluation(s) on SkillsCommons? We strongly encourage grantees to upload their final third-party evaluation reports to www.SkillsCommons.org along with their Open Educational Resources (OER) grant deliverables. Third-party evaluation reports provide important context for the OER grant deliverables stored within the SkillsCommons repository. Interim reports may be posted as well if appropriate for this purpose. While evaluation reports are not considered Open Educational Resources (OER) grant deliverables, we encourage you to post your third-party evaluation report as a machine-readable portable document file (PDF), for accessibility purposes and to make the content more easily discovered online. When uploading your third party evaluation report to SkillsCommons, please select "Final Program Report" from the list in the "Material Type" field. The SkillsCommons Support Center provides step by step details on the upload process and file preparation, including how to apply a Creative Commons license. SkillsCommons staff are available to answer more detailed questions at support@skillscommons.org. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

4.   How will grantee third-party evaluations be used? Both interim and final evaluations will be used to inform the TAACCCT national evaluation. In addition, we anticipate that ETA will post all final (but not all interim) grantee evaluations to ETA's Workforce System Strategies website as additions to the body of research knowledge developed through TAACCCT. Evaluations that meet the standards of systematic review for USDOL's Clearinghouse for Labor and Evaluation Research, or **CLEAR**, will be included on that site as well, most likely

under the topic for Community Colleges.   We also encourage grantees and third-party evaluators to post the final report on their respective websites so learning from the TAACCCT grants can be shared as widely as possible. You may also want to present your evaluation findings at conferences and meetings so your colleagues and partners can learn from your TAACCCT experiences. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

C.   Evaluation Questions Related to Solicitations for Grant Applications (SGAs)

1.   What are the criteria required by the SGAs for procuring third-party evaluators? At a minimum, there are four primary categories to consider for organizing your RFPs and using as criteria for reviewing your potential evaluators' proposals for your work:

1) General Qualifications

2) Technical Plan

3) Management and Staffing Plan

4) Cost

[Originally published in FAQ Procuring Third-Party Evaluators from December 11, 2012]

2.   What elements should be included in the budget or budget narrative of the proposal? The proposal should include a budget and budget narrative that is matched to specific tasks described in the technical plan and against the timeline described in the management plan. The budget should be linked to tasks and show levels of effort for each staff member by task and by month to allow for a review of each proposer's individual understandings of the effort as well as compare costs. *[Originally published in FAQ Procuring Third-Party Evaluators from December 11, 2012]*

3.   What general qualifications should be expected of an evaluator? Grantees should consider requesting that proposers demonstrate abilities and competencies based on a practical and scholarly knowledge of the field and the specific design type. This can be demonstrated through past performance on evaluation projects using similar evaluation design or methods (e.g., regression discontinuity design, process analysis) and evaluations of similar kinds of interventions (e.g., job training, community college programs). For example:

The proposer could demonstrate expertise in conducting evaluations of the same design type that you have proposed. For example, if you are implementing a random assignment evaluation, the proposer should demonstrate expertise in

conducting assignment evaluations and should list past projects in which the organization has successfully designed and performed random assignment. The names of clients or other sponsoring references that the grantee can check would be a helpful requirement. The educational credentials and relevant experience of the proposer's named key staff members might also be a useful gauge of general experience since staff in evaluation organizations can and do change.

The proposer could demonstrate familiarity with your specific type of intervention, and demonstrate that they have a strong understanding of your intervention. They could reference past work that was similar in which the proposer's organization was central, and demonstrate this capacity through the educational credentials of individual staff members. For example, if the grantee's intervention focuses on new on-line intake or services, the proposer should demonstrate some knowledge of both the state of online interventions as well as the best methods to evaluate them in similar contexts as the grantee.

The proposer could demonstrate, via past performance and staff educational credentials and relevant experience, their ability to carry out all of the individual tasks needed for the grantee's evaluation. This includes the ability to develop evaluation design plans, choose the appropriate type of evaluation rigor, create and implement data collection and sampling plans, conduct analyses, write reports, and disseminate results. *[Originally published in FAQ Procuring Third-Party Evaluators from December 11, 2012]*

4.   What are some elements that should be included in the management and staff plan of the proposal? Grantees should ask proposers to develop a detailed timeline and staffing plan, to describe their experience in managing similar evaluations.

The proposer should provide an evaluation timeline, often in the form of a visual chart, which appropriately matches your planned intervention (for example, collecting data at appropriate times in your rollout and after the intervention ends).

The proposer should provide a statement on how they propose to manage the evaluation, including their experience in managing evaluations of a similar type and magnitude.

The proposer should summarize the names, titles, and roles of key staff and provide their full resumes in an appendix. The proposer should describe which staff members are working on the various tasks.

The RFP should note that the final evaluator must collaborate with the Department of Labor national evaluator in four different ways:

- Providing all evaluation deliverables, including the final evaluation design, progress reports, final data (cleaned of PII), and evaluation findings to the Department of Labor to be shared with the national evaluator

- Participating in several, hour-long evaluator webinars through the duration of the evaluation as well as a TAACCCT evaluator online community of practice

- Attending two-day evaluation conferences in Washington, DC in 2013 and 2014; and

- Participating in regular communications with the Department of Labor national evaluator for any technical assistance needs and responding to the Department of Labor national evaluator for requests such as for de-identified individual-level data for special analyses

[Originally published in FAQ Procuring Third-Party Evaluators from December 11, 2012]

5.   Is there a standard format for proposals [for third-party evaluators]?
Although there is no standard proposal format, a similar format for submission will make the grantee's process for reviewing proposal submissions more efficient. A similar format will allow the grantee to grade or score proposals in a uniform manner so that scores can be compared consistently to make the best selection. Depending on the grantee's internal procurement procedures, assigning point scales to the four criteria might be helpful.

Grantees may find it helpful to provide guidelines on the length and format of the technical proposal (e.g., no more than 20 to 30 pages, double-spaced, 12 point font) to make the proposal review process manageable and to encourage an organized and concise response to the RFP.

The grantee should also provide as much detail about the planned intervention and preliminary evaluation plans to proposers as possible. This could involve attaching the original technical proposal, the original evaluation plan, and the improvement recommendations from the Department of Labor (Evaluation Improvement Plans). The more information the proposer's have, the more accurately they can assess the grantee's evaluation needs, the level of effort to meet that need, and the costs of that effort. *[Originally published in FAQ Procuring Third-Party Evaluators from December 11, 2012]*

6.   **What are some details that should be included in the technical plan submitted in the proposal?** In this part of the RFP, the proposer should provide technical details and evaluation plans building off the evaluation design type that was submitted by the grantee, and the Evaluation Improvement Plans. Remember, it is critical that the proposer should demonstrate familiarity with the evidence base upon which you have based your intervention. The grantee should allow proposers to creatively advance and expand on the evaluation details from the original evaluation plan. This part of the proposal focuses on specifics of the evaluation and how the proposer intends to accomplish the work.

The RFP should lay out the types of basic tasks that will be involved in the evaluation, such as:

- Refinement of research questions

- Development of indicators and data definitions and identification of the data sources and data collection methods

- Coordination with the grantee on the implementation of the evaluation

- Approval of institutional review boards as needed, and knowledge of data security and confidentiality procedures

- Development of data collection instruments

- Timing and execution of the data collection

- Appropriate analysis methods (including statistical, financial, and qualitative data analysis methods—see table for more information

- Monitoring and reporting of evaluation milestones and progress to the grantee and the department of labor (note that the proposers should expect to submit all evaluation deliverables, cleaned data, and progress reports to the Department of Labor as well as the grantee, as appropriate)

The grantee can ask the proposer to suggest new or altered tasks that might improve the overall evaluation plan. Because the proposal will expand on the original evaluation plan but will not be a final evaluation design, the grantee should look for detailed proposals but should not expect all technical issues to be resolved. Rather, the proposers should at the very least acknowledge all potential technical issues, any areas of uncertainty, and any possible risks (such as, low recruitment of participants, non-response to follow-up surveys, etc.). The

tasks that are mapped out in the original evaluation plans and Evaluation Improvement Plans may help with this task listing in the RFP. *[Originally published in FAQ Procuring Third-Party Evaluators from December 11, 2012]*

III.   PERFORMANCE REPORTING

A.   General Information on TAACCCT Performance Reporting

- You can find key resources regarding performance reporting requirements at

https://taaccct.workforcegps.org/resources/2016/07/13/11/53/TAACCCT_Performance_Key_Resources

1.   What documentation on grant participants is required for the TAACCCT grant? Grantees should ensure that they adhere to the OMB-approved TAACCCT performance reporting requirements (OMB Control # 1205-0489) which includes the requirement that grantees collect sufficient documentation to support the grant outcomes reported in the Annual Performance Report (APR) and Quarterly Narrative Progress Report (QPR). For example, the number of "TAA eligible" participants is one of the required data elements in the OMB-approved reporting requirements. To report an individual as a TAA-eligible participant under this specific data element, grantees should maintain source documentation (such as a copy of an individual's BT-1 Form) to verify that the individual is eligible for assistance under the TAA for Workers program.

In general, grantees do not need to seek participant-level source documentation to demonstrate that an individual falls into one of the categories of participants that the grantee stated they would target or serve in their SOW. However, as described above, such participant-level documentation is required when needed to support specific types of grant outcomes reported by the grantees in their APR and QPR, such as TAA-eligible participants to demonstrate compliance with their statement of work (SOW). Grantees should determine the specific level of documentation that is necessary based on their own individual statement of work.

In addition, if grantees specified that they were targeting specific populations in their SOW (in addition to TAA eligible workers), they need to document efforts to recruit and/or serve these populations. For example, if a grantee identified in their SOW they would target "unemployed individuals," the grantee could appropriately demonstrate that they are targeting these individuals through a documented outreach and recruitment plan targeting unemployed workers, or

through a documented partnership or contract with the local American Job Center to refer individuals to the TAACCCT-funded program. *[Originally published in Round 1 Grantee FAQ #7: Participant Eligibility, Vets POS, Documenting Performance Reporting Requirements, and Serving Participants in Alignment with Grantee SOWs]*

2.   Is Selective Service Registration a Requirement to Receive Services Through a TAACCCT Grant? Enrollment in selective service is not required by the TAACCCT grant in order for a student to receive services under that grant. Please be advised, however, that educational institutions offering benefits or assistance under Title IV of the Higher Education Act, such as Pell Grants, may be required to monitor student compliance with the selective service registration requirement through regulations issued by the Secretary of Education. Because the use of grant funds to pay for tuition and scholarships are not allowable costs for the TAACCCT grants, grantees should be cognizant that students will often need to access Federal financial assistance to access TAACCCT-funded programs and courses. Grantees should note that ETA encourages them to offer Federal financial assistance, as needed and available, to support students that enroll in TAACCCT funded courses or programs *[Originally published in FAQ #1 from June 21, 2013]*

3.   Can TAACCCT grantees provide services to an individual who fails to disclose a Social Security Number (SSN)? Grantees will be required to attempt to collect Social Security Numbers on participants in accordance with the Office of Management and Budget reporting package for the TAACCCT grants. However, while the package requires grantees to attempt to collect this information, under Section 7 of the Privacy Act (5 U.S.C. Section 552a Note (Disclosure of Social Security Number)) Federal grant-funded services cannot be denied to individuals because of the individual's failure to disclose an SSN. *[Originally published in FAQ #1 from June 21, 2013]*

B.   Record Retention Requirements

1.   Where and How Should We Store or Destroy Participant Files? It is the responsibility of the grantee to ensure that all participant files are stored and retained in accordance with federal regulation, as well as state and organization policies. Part II - Chapter 14 of the One-Stop Comprehensive Financial Management Technical Assistance Guide addresses records retention. *[Originally published in "Round 2 Grant Closeout Finishing Strong" Webinar from November 5, 2015]*

2.   How Long Should We Keep Our Files Accessible Before Putting Them In Archives? Please follow your institution's policies, which must be consistent with federal requirements Federal requirements on record retention state the following: financial records, supporting documents, statistical records, and all other records pertinent to the grant agreement shall be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as authorized by the Federal awarding agency.

The three year clock may reset if there is an audit or open investigation. While such an investigation is open or while the audit is resolved, all records must be retained. Once a final action has been taken, the three-year clock starts again. More information on record retention at Chapter 14 of the One-Stop Comprehensive Financial Management Technical Assistance Guide (TAG) available on our website at http://www.doleta.gov/grants/pdf/TAG_PartII_July2011.pdf *[Originally published in "Round 2 Grant Closeout Finishing Strong" Webinar from November 5, 2015]*

3.   Can We Save E-files, DVDs, disks, etc., and Destroy All Paper Files? Please ensure there are adequate measures in place to safeguard Personally Identifiable Information (PII). Please see TEGL 39-11 for additional guidance at http://wdr.doleta.gov/directives/attach/TEGL/TEGL_39_11_Acc.pdf *[Originally published in "Round 2 Grant Closeout Finishing Strong" Webinar from November 5, 2015]*

C.   Annual vs. Cumulative Reporting

1.   Should I be reporting annual or cumulative information in my Annual Performance Reports? You should be reporting annual data and not the performance data for your grant to date. In other words, report only what has occurred during the year since you last reported. Your thermometer report will provide a running total of your cumulative outcomes to date. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

D.   Incumbent workers

1.   Can TAACCCT grantees serve incumbent workers? The intent of the TAACCCT grants is to build the capacity of community colleges to help TAA-eligible workers and other unemployed adults succeed in acquiring the skills, degrees, and credentials needed for high-wage, high skill employment. However,

grantees may serve incumbent workers, as long as serving this population was an identified population in grantee's SOW, is consistent with their SOW, and these individuals are reported appropriately. *[Originally published in FAQ #1 June 21, 2013 and repeated in FAQ #2 July 8, 2013]*

2. Who counts as an incumbent worker? The definition of "incumbent worker" in the reporting package is that the student is employed at enrollment. There is no minimum number of hours or special stipulations on what type of employment the position falls under to be counted or not counted under this definition. If the student is in any capacity employed at enrollment, he or she is considered an incumbent worker. *[Originally published in FAQ #1 June 21, 2013 and repeated in FAQ #2 July 8, 2013]*

3. Can I count incumbent worker outcomes in the Annual Performance Report? Incumbent workers can and should be recorded in all data elements for which they qualify, (such as the Total Number of Students Completing Credit Hours, and the Total Number of Earned Degrees/Certificates, etc.). Incumbent workers are EXCLUDED from being counted in the outcomes Total Number Employed After Program of Study Completion and Total Number Retained in Employment After Program of Study Completion. *[Originally published in FAQ #2 July 8, 2013]*

E. Reporting Participant Outcomes Across Multiple Years

1. In which of the APR outcomes can participants be counted more than once during my grant's period of performance? The only APR outcomes where a participant can be accounted for more than once is in the B.3 field, Total Number Still Retained in Their Programs of Study (or Other Grant-Funded Programs) and B.5a, Total Number of Students Completing Credit Hours. All of the other outcomes that ask about the total number of participants are one-time measures, meaning that each participant can only be counted the first time they qualify to be counted there. These include B.2, B.2a, B.4, B.5a, B.6a, B.6b, B.6c, B.7, B.8, B.9, and B.10. For example, a participant that completes multiple programs of study can only be counted one time, even if he or she completes more than one program of study and even if they are completed in different years of the grant. For B.3 and B5a, however, students can be counted in as many years as they are still retained in a grant-funded program and in as many years as they complete any number of credit hours. B.5 and B.6 are not measures that refer to a number of students; they refer to a number of credit hours completed and a number of earned credentials, respectively, and do not apply to this question. *[Originally published in FAQ #4 from April 15, 2014;*

shaded sections amended in Revision: August, 25 2016.]

F.   Incomplete Data to Report by the Deadline

1.   If I don't have all of the data when it is time to report, what happens and what should I do? Close your report on time with the data you have available, but make a note in the "Additional Comments" section of your report stating that your report is incomplete and you will update it when you have the information that you need. When you receive additional information, contact your FPO and request that the report for the appropriate year or quarter be unlocked. There is no penalty for entering some of your data after the deadline if it was not available by the reporting due date*. [Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

2.   There is a lag time for me to get the administrative records that tell me employment and retention rates of my students after they complete programs. How do I report these students? We encourage you to report the information that you have available by the deadline of the Annual Performance Report, and update the same APR once you have received your administrative records, since these records will pertain to students who completed during the previous year. To update the previous year's report, you should contact your FPO to submit an unlock request for that report. Please keep in mind your own annual targets for employment retention and how reporting those in a particular year will affect meeting your annual targets. *[Originally published from FAQ #2 on July 8, 2013; revised for Revision: August, 25 2016.]*

3.   What can I do if I run out of room to report in my Quarterly Narrative Progress Report (QNPR)? You are always free to send additional documents and details for each section to your FPO and the TAACCCT mailbox to report on your progress, however, you should ensure that you at least summarize the main ideas for each section in the actual body of the QNPR in the reporting system, as this is the actual OMB-approved form. *[Originally published in FAQ #4 from April 15, 2014]*

G.   Participants (Outcome B.1 of the Reporting Requirements)

1.   Who is defined as a participant in TAACCCT? The purpose of the grants is to develop programs and materials that are suitable for the diverse population of workers eligible for training under the TAA for Workers program, however, anyone can benefit from the programs and materials developed. A participant in TAACCCT is an individual who 1) meets the criteria that grantees used to identify who "participants" are in their statements of work (SOW); and 2) who enters or

enrolls in a "grant-funded" program that was developed, delivered, offered, or improved in whole or in part by grant funds, or a course that is part of such a program, and who attends the program or course more than once. Students that try out a course during the "add/drop period" at the beginning of a semester and don't remain enrolled after the "add/drop" period is over would not be counted as participants. *[Originally published in FAQ #1 from June 21, 2013 and repeated in FAQ #5 August 1, 2014]*

2.   How should grantees determine if an individual "meets the criteria that grantees used to identify who "participants" are in their SOW? In their SOWs, grantees stated that individuals would be considered participants if they received or benefitted from specific types of services or activities through the grant. For example, some grantees stated that grant funds would be used to develop specific courses, and that a specified number of individuals would enroll in these courses and be reported as participants. In determining whether a specific individual would be considered a participant, these grantees should determine if that person meets the criteria that the grantee itself used to identify participants in its SOW. *[Originally published in FAQ #1 from June 21, 2013]*

3.   In each reporting year, do I report data elements for the unique participants enrolled cumulatively (B.1 in Table 1)? You should report cumulatively for that year only. In other words, each year, report only the new number of students in your program for that year. *[Most recently published in FAQ #2 from July 8, 2013]*

4.   **If someone exits and re-enrolls, can I count them as a participant again?** Participants who exit the institution cannot be considered a new participant. This includes students who exit for "other reasons" as defined by the institution – see Section III.I.2 for the definition of exit. The definition of a participant indicates that each student must be *unique***.** *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

5.   When would a student not count as a participant in B.1? Non-credit programs that do not lead to an industry-recognized degree or certificate cannot be counted in B1 field, even if they are paid for with grant funds. Some examples of non-credit programs that do not count include bridge programs, and non-contextualized ESL, GED, or basic skills programs where no credit is offered. *[Originally published in FAQ #3 from July 10, 2013 and repeated in FAQ #5 from August 1, 2014]*

6.   Can I count students who are not considered participants in any of the outcomes in the Annual Performance Report (APR)? Unfortunately, no. The outcomes pertain to students who are considered participants. Please refer to the "Participants" section in this document, to find out more about the definition of a participant. If you have used data element C.10 to develop your own outcomes on non-participants to report to ETA and other stakeholders, continue to do so in these customized fields. (See section III. R.) Otherwise, you can report non-participants in the "Additional Comments" section of the APR. *[Originally published in FAQ #4 from April 15, 2014; shaded sections revised for Revision: August, 25 2016.]*

7.   Is there a place I can record outcomes for students who enroll in my non-credit programs that do not count under B.1? Yes. Students who are enrolled in or complete one of these non-credit programs may be reported in the "Additional Comments" section of the APR.

Once students enroll in a credit or non-credit program of study leading to an industry-recognized degree or credential, they can be counted in B.1, but not until they enroll in the program of study. They are not eligible to be counted while they are enrolled in the non-credit program that does not grant an industry-recognized degree or certificate. *[Originally published in FAQ #3 from July 10, 2013]*

H.   Definition of Grant-Funded Programs and Programs of Study

1.   The description of B.1 of the APR (Unique Participants Served/Enrolled) says to enter the number of individuals who entered any of the grant-funded programs offered. What is a grant-funded program? A grant-funded program is a credit or non-credit program of study which is paid for in whole or in part with grant funds and which leads to an industry-recognized degree or certificate. For more information about industry-recognized credentials, please review TEGL 15-10 and its accompanying Attachment 2. *[Originally published in FAQ #3 from July 10, 2013 and repeated in FAQ #5 from August 1, 2014; revised for Revision: August, 25 2016.]*

2.   What counts as a "grant-funded" program or course? Instances of "grant-funded" programs and courses include, but are not limited to, a course where the curriculum was developed, purchased, or modified using grant funds; a course for which training equipment (e.g. simulators) that is required for the course were purchased using grant funds; a course that is taught by an instructor whose salary is paid for in whole or in part with grant funds; an internship

program developed with grant funds; a course that uses classroom supplies purchased with grant funds; and a course held in classroom space that was altered with grant funds. A determination about which programs and courses are "grant-funded" should be made on the basis of the grantee's SOW through identification of the specific programs to be developed, delivered, offered, or improved under the grant and the specific activities the grantee plans to undertake in order to develop, offer, deliver, or improve those programs. *[Originally published in FAQ #1 from June 21, 2013 and repeated in FAQ #5 from August 1, 2014]*

3.   In the FAQs and other documents provided by ETA, sometimes the term "program" is used and sometimes the phrase "program of study" is used. What is the difference between the two? There is no difference; the two are used interchangeably. Outcome B.1 (Unique Participants Served/Enrolled) is the only outcome on which grantees report to use the term "program" as opposed to the complete phrase "program of study." The OMB reporting package defines a program of study as "an educational program in which a degree or certificate is granted." ETA has provided further guidance that specifies that the degrees and certificates must be industry-recognized. *[Originally published in FAQ #5 from August 1, 2014]*

I.   Completion (Outcomes B.2/B.2a of the Reporting Requirements)

1.   When do I count someone as having completed a TAACCCT program? DOL may define completion differently than your institution. For reporting purposes, once a participant has completed his or her first certificate or degree, he or she is considered a completer and should be counted in B.2. This holds true even if the participant is enrolled in a career ladder credential program or is expected to complete stackable credentials and the institution defines program of study as having completed all of these credentials. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

2.   What is the difference between completion and exit? Completion is defined as having earned all of the credit hours or formal award units needed for the award of a degree or certificate in a program of study. Exit refers to a lack of enrollment at the college and can include formal withdrawal, expulsion, graduation, and other reasons (e.g., the student suddenly stops attending, etc.). Students in a program with stacked credentials are counted as completers after earning the first credential, however, they are not counted as exiters until they leave or graduate or stop attending for other reasons. Completion versus exit affects when to count students as having entered employment if they get a job

before leaving the college. *[Originally published in FAQ #2 from July 8, 2013]*

J.   Retention in TAACCCT Programs (Outcome B.3 of the Reporting Requirements)

[This section is intentionally left blank as a placeholder for any questions which may later be answered here to maintain the structure of the FAQ]

K.   Retention in Non-TAACCCT Programs (Outcome B.4 of the Reporting Requirements)

1.   The requirements for meeting the definition of participants include the fact the students must be enrolled in a program of study funded by TAACCCT or a course that is part of such a program. If I have students who are enrolled in a TAACCCT-funded course only and will not be completing a TAACCCT-funded program, where will I record what happens to these students? Students who enroll in a TAACCCT-funded course only can be placed into B.4 to indicate that they have been retained in a non-TAACCCT funded program. If they complete the TAACCCT-funded course, the credit hours they complete can be counted in B.5 and they can be counted in B.5a as a student completed TAACCCT credit hours. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

L.   Credit Hours (Outcomes B.5/B.5a of the Reporting Requirements)

1.   Do non grant-funded credit hours count in B.5/B/5a? No. Grantees should only count and report credits for coursework (or other activities in which credit is granted) that was developed or modified in whole or in part with grant funds*. [Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

2.   Do non-credit hours count in these fields? No. Only hours in which credit is granted on the transcript of the participant are eligible to be counted in these fields. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

3.   Can grantees count and report credit hours that were earned by the participants prior to the start of the period of performance if they were a part of the program of study that was modified by grant funds? No. Only credit hours that were completed during the period of performance may be counted in these fields. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

M. Credentials (Outcomes B.6/B.6a/B.6b/B.6c of the Reporting Requirements)

1.   What is an industry-recognized credential? In order to be counted in B6.B6a/B6b/B6c, credentials in TAACCCT must be industry-recognized. ETA TEGL 15-10 identifies industry-recognized as "one that either is developed and offered by, or endorsed by a nationally-recognized industry association or organization representing a sizeable portion of the industry sector, or a credential that is sought or accepted by companies within the industry sector for purposes of hiring or recruitment…" (Attachment 2, p. 6). The credential must also be portable, stackable, and, ideally, accredited, as noted in the Attachment 2. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

2.   My credential appears to meet the definition of TEGL 15-10 Attachment 2. I'd like to submit it to ETA to make sure though. If I do that, will ETA make a determination for me? Though DOL can make definite determinations of a few certificates that don't count based on general knowledge (i.e., OSHA-10, first aid/CPR, certificates of completion, etc.), ETA generally declines to make specific determinations. Grantees must use TEGL 15-10 Attachment 2 to make their own determinations about whether the certificate meets the guidelines set forward there and maintain documentation about why you believe this to be the case. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

3.   Can I count credentials such as licenses in which a certificate or degree is not granted? The outcome definitions specifically state that certificates and degrees are the types that should be counted in B6, B6a, B6b, and B6c. If participants are earning other types of credentials in which no certificates or degrees are granted, those credential types and the participants who earn them can be documented in your Additional Comments Section of your Annual Performance Report. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

N. Further Education After Completion (Outcome B.7 of the Reporting Requirements)

1.   Can I count someone both as having gone on to further education (B.7) and having entered employment (B.8)? No. Both are considered "exit points" for tracking purposes. Grantees should count participants in the outcome corresponding to the event that occurred first in time during the reporting year, and from this point, grantees should only collect and report follow-up

information on these participants as appropriate. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

O.   Employment (Outcome B.8 of the Reporting Requirements)

1.   In order to be counted as having been placed into employment, does a student have to enter a training-related job? No. The definition of employment states only that it must be unsubsidized. *[Originally published in FAQ #2 from July 8, 2013]*

2.   How do I report the employment of students in Table 1 who got a job before they exited the college, but after completion of the grant-funded program? As long as the student completed a grant-funded program, and is still employed once he or she does exit the college, then that student can be counted as being placed into employment. He or she would not be counted as being placed into employment until exiting the college. *[Originally published in FAQ #2 from July 8, 2013]*

3.   My institution has had a difficult time obtaining wage records from state agencies. Is this the only method of documentation we can use to demonstrate that our participants have been placed into jobs? No. Although the SGAs state that grantees should attempt to establish relationships with their state's agencies to obtain this information if available and possible, where this has not yet been established, grantees can and should use other methods to track and document employment outcomes. The alternate methods available to TAACCCT grantees were aligned with ETA TEGL 17-05 in a revised version of the TAACCCT Source Documentation Toolkit released on June 30, 2016. Please reference that document for additional information. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

P.   Employment Retention (Outcome B.9 of the Reporting Requirements)

1.   To count as having retained a job, do students have to retain the same job in which they were employed in the first place? No. The definition of retaining employment does not specify that they must be employed in the same job in which they began employment. *[Originally published in FAQ #2 from July 8, 2013]*

2.   Can I report incumbent workers in the Total Number Retained in Employment After Program of Study Completion outcome? No, because the definition of the "retained employment" outcome is, "the total number of

individuals… who entered unsubsidized employment in the first quarter after the quarter in which the student exits the college." Because incumbent workers were already employed, they cannot be counted in this outcome. *[Originally published in FAQ #2 July 8, 2013]*

Q.   Incumbent Workers and Wage Increase (Outcome B.10 of the Reporting Requirements)

1.   How do I capture the progress of employment outcomes for incumbent workers? Most of the outcome measures are designed to collect information about individuals who were not employed when they enrolled. There is a special data element *just* for incumbent workers in Table 1 of the APR, Line B.10, which requests data on incumbent workers who receive a wage increase post-enrollment. This wage increase could occur while the participant was enrolled or after he or she has left the program; whether he or she completed the program or not. Additionally, this wage increase could be an increase at the same job or in a different job. For example, participants who are underemployed, who move into training-related employment, who move from contingent employment to more regular employment, or from part-time to full-time work, may experience a wage increase. These employment changes could occur for an incumbent worker, and would be captured in B.10. *[Originally published in FAQ #2 from July 8, 2013]*

2.   Is there a way I can still break out the employment outcomes further? Grantees that want to break down further the employment outcomes beyond Line B.10 in Table 1 of the APR for their incumbent workers (i.e., those who move from part-time work to full-time work, those who enter training-related employment, those who retain their positions, etc.), are encouraged to do so, though this is not an ETA requirement. Grantees may use the "Additional Comments" section of the APR to report this information. *[Originally published in FAQ #2 from July 8, 2013]*

R.   Customized Measures and Field C.10 in the Annual Performance Report

1.   Where can I report additional outcomes in the Annual Performance Report (APR)? If you have additional outcomes to report, please put that information in the "Additional Comments" section of the APR and report annual progress on those outcomes. The exception is that if you have already begun using field C.10 and have created customized measures for your grant. In the outcome C.10 (Other Demographic Measures), grantees were at one time able to

create up to five customized data elements and report on those in each APR. If you have created one of these measures, you must continue reporting on it for the life of the grant. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

S.   Performance Reporting During the Extension of Grant-Funded Program Activities

- **See Section VI**

T.   Performance Reporting During Closeout

- **See Section VII.**

IV.   FISCAL TOPICS RELATED TO TAACCCT

A.   General Information on TAACCCT Fiscal Topics

General information on financial management can be found in the One-Stop Financial Management TAG at https://doleta.gov/grants/pdf/TAG_PartII_July2011.pdf.

Please also see the Closeout FAQs related to allowable costs in section VI.

V.   TAACCCT'S REPOSITORY OF DELIVERABLES – SKILLSCOMMONS

A.   General Information on Repository of Deliverables – SkillsCommons

Find the repository at https://www.skillscommons.org/.

The site purpose and further general information can be found on the website in the "About" tab.

Please visit the SkillsCommons Support Center for guides, videos, tutorials and manuals at: http://support.taaccct.org/.

Grantees may set up a new user account (register) on http://SkillsCommons.org using this link: https://www.skillscommons.org/password-login.

Additional FAQs related to technical aspects of using SkillsCommons are also posted here: http://support.skillscommons.org/faqs/.

B.   Deliverables

1.   What are deliverables? According to the SGAs, the Department considers

curricula, course materials, teacher guides, and other products developed with grant funds as grant deliverables. These items were identified in each grantee's statement of work as deliverables and to be submitted to the Department according to the workplan or prior to the end of the period of performance. *[Originally published in Round 2 Grant Closeout FAQs posted with webinar on November 5, 2015]*

2.   How Will Final Products/Deliverables Be Submitted to the Department?
All products identified in B.1. above should be submitted to the Department by posting them on the TAACCCT Repository at: www.SkillsCommons.org. *[Most recently published in "Round 2 Grant Closeout Finishing Strong" Webinar from November 5, 2015]*

3.   Are Outreach Materials and other Program Support Materials Considered Grant Deliverables? Although program management and implementation tools, outreach materials, and other program support materials are tangible items that could be considered "works" produced through your grant project, these items are not necessarily considered deliverables unless explicitly described as such in a grantee's SOW. Grantees should use their discretion in consultation with their FPO about which of these to submit to the Department.

In determining whether to submit an item, grantees should keep in mind that some of these materials that support your curricula and course materials may be necessary in order to understand, learn from, and replicate your work. These may include course descriptions, outreach materials, such as those that describe the programs of study for your workforce system and other stakeholders and partners, or materials that document best practices in grant management. In other cases, these materials may be research studies on how to better serve a specific target population. These materials would be considered important to understanding your grant program of study deliverables and should be submitted together with the curricula and course materials using www.SkillsCommons.org with open license and disclaimers, as appropriate. In the repository, these should be identified and categorized as "Program Support Materials" using the appropriate meta-data schema.

Other items, such as meeting minutes, organizational charts, institutional policies, that are created as a result of the operation of your grant program may provide useful information for understanding the administration of grant activities at your institution. In cases where these items are more appropriately considered records, grantees should follow their institution's policy on records

management, which should be in alignment with Federal recordkeeping requirements.

[Originally published on SkillsCommons at http://support.taaccct.org/faqs/; now found in Compilation of TAACCCT FAQs as of the: August, 25 2016 Version.]

4.   For Round 3 Grant Projects, is it appropriate, for our consortium to identify one lead college per occupation that will create the formal OER for our consortium, and simply tag the other colleges, where additional OER deliverables would substantively duplicate the lead college submission? Round 3 grantees should choose one lead college in the consortium to submit each of the types of curriculum so it's only submitted into www.skillscommons.org once for the entire consortium. Grantees should tag/reference the other consortium members who also used the same curriculum in the description field. If there is a substantial variation that may be of interest to others, the grantee might want to post both versions in that case and explain the difference. *[Originally published on SkillsCommons at http://support.taaccct.org/faqs/; now found in Compilation of TAACCCT FAQs as of the: August, 25 2016 Version.]*

5.   Should Our Materials Be in a Final Version Before Being Submitted to the SkillsCommons.org Repository? Grantees are encouraged to share draft and pre-final versions of content, though this is not a grant requirement. Sharing content early creates many benefits and opportunities for grantees. For example, sharing content can: Help avoid duplicate efforts by other grantees and consortia that are working in similar areas; encourage a national exchange of ideas and solutions; position your grant and college as knowledge experts in your field; provide an early return on investment to key stakeholders; and attract new partners to your project. In addition, early versions of your products can be submitted as a way of becoming familiar with SkillsCommons.org repository. Grantees should note that the nature of open resources is the intrinsic ability to continuously edit and update the content, regardless of whether they are in draft or final version. *[Originally published in "Round 2 Grant Closeout Finishing Strong" Webinar from November 5, 2015]*

C.   Third-Party Review Requirement

1.   The Solicitation for Grant Applications (SGA) said that a third party review is required – is that different than the program evaluation? The SGA states that successful applicants will be required to "identify third-party subject matter experts to conduct reviews of the deliverables produced through the grant. " This review of deliverables is required for all TAACCCT grantees, and is

not related to program evaluation. *[Originally published in FAQ #1 from June 21, 2013]*

2. **What is a Subject Matter Expert?** Subject matter experts are individuals with demonstrated experience in developing and/or implementing similar deliverables. These experts could include peers, such as representatives from neighboring education and training providers. A possible source of experts may also be staff 4 members at the grantee's institution that are already involved in the process of reviewing similar deliverable content, such as curricula.

Grantees should not confuse this requirement with the requirement to procure a third-party project evaluator. While in some cases, an evaluator may also have demonstrated expertise with the deliverables, due to the diversity of subject matter and content, ETA expects this to be the exception rather than the rule. *[Originally published in FAQ #1 from June 21, 2013]*

3. **Are all of my deliverables required to undergo a third-party review?** The intent of the requirement for a third-party review of deliverables is to assess the quality of substantive deliverables resulting in tangible products that are identified in grantees' Statements of Work. ETA considers substantive deliverables to be those which contain educational content or that document educational structures and processes. Examples include, but are not limited to, curriculum materials, online courses and programs, manuals, and program evaluation results. All deliverables identified in grantees' Statements of Work that meet these criteria should undergo a review. Non-tangible deliverables, such as staff hiring, or deliverables that do not contain educational substance, such as outreach materials or technological infrastructure, are not required to go through the review process. *[Originally published in FAQ #1 from June 21, 2013]*

4. **What is the SGA Requirement for Subject matter experts' reviews of grant-created content and industry partner participation?** Each Round of TAACCCT grant funding has specific SGA requirements. The subject matter experts' reviews of grant-created content and industry partner participation requirements for each Round are referenced below. For additional information, please view the TAACCCT Voluntary Subject Matter Expert and Industry Partner Summary Template on SkillsCommons posted on the Completing & Closing Out Your Grant page in the Skills Commons Support Center.

For Round 2: "Grantees will be required to identify third-party subject matter experts to conduct reviews of the deliverables produced through the grant. Applicants should allot funds in their budgets for the independent review of their

deliverables by appropriate subject matter experts. Subject matter experts are individuals with demonstrated experience in developing and/or implementing similar deliverables. These experts could include applicants' peers, such as representatives from neighboring education and training providers. The applicant must provide the Department with the results of the review and the qualifications of the reviewer(s) at the time the deliverables are provided to the Department." *Retrieved 12/5/2014 from:*
http://www.doleta.gov/grants/pdf/taaccct_sga_dfa_py_11_08.pdf. *pg. 8.*

"Applicants must involve at least one employer for each targeted industry in the program who must be actively engaged in identifying the necessary skills and competencies for the program(s), and who will assist with curriculum development and program design, as well as participating in one or more of the following ways: helping define the program strategies and goals, providing resources to support education/training (such as equipment, instructors, funding, internships, or other work-based learning activities), and committing to hire qualified program participants. While only one employer for each targeted industry is required, the Department is most interested in applicants that collaborate with multiple employers and/or other organizations representing an industry sector, including skills consortia, existing industry sectoral partnerships, economic development clusters, or regional innovation clusters, to ensure that program participants will be prepared with the skills needed in the applicant's region." *Retrieved 12/5/2014 from:*
http://www.doleta.gov/grants/pdf/taaccct_sga_dfa_py_11_08.pdf. *pg. 6.*

For Round 3: "Grantees will be required to identify third-party subject matter experts to conduct reviews of the deliverables produced through the grant. Applicants should allot funds in their budgets for the independent review of their deliverables by appropriate subject matter experts. Subject matter experts are individuals with demonstrated experience in developing and/or implementing similar deliverables. These experts could include applicants' peers, such as representatives from neighboring education and training providers. The applicant must provide the Department with the results of the review and the qualifications of the reviewer(s) at the time the deliverables are provided to the Department." *Retrieved 12/5/2014 from:*
http://www.doleta.gov/grants/pdf/taaccct_sga_dfa_py_12_10.pdf. *pg. 30-31.*

"Applicants must involve at least one employer for each targeted industry in each site location served by the program. The employer partner must be actively engaged in identifying the necessary skills and competencies for the program(s),

and must assist with curriculum development and program design, as well as participate in one or more of the following ways: a) helping define the program strategies and goals; b) providing resources to support education/training (such as equipment, facilities, instructors, funding, internships, apprenticeships, and other work- based training opportunities, where applicable); and c) committing to hire, promote and/or retain qualified program participants. While alignment with only one employer for each targeted industry in each site location is required, the Department encourages applicants to collaborate with multiple employers and/or other organizations representing an industry sector, including existing industry sector partnerships, labor-management organizations, economic development clusters, or regional innovation clusters, to ensure that program participants will be prepared with the skills needed in the applicant's community." *Retrieved 12/5/2014 from:* http://www.doleta.gov/grants/pdf/taaccct_sga_dfa_py_12_10.pdf*. pg. 11.*

For Round 4: "Grantees will be required to identify third-party subject matter experts to conduct reviews of the deliverables produced through the grant. Applicants should allot funds in their budgets for the independent review of their deliverables by appropriate subject matter experts. Subject matter experts are individuals with demonstrated experience in developing and/or implementing similar deliverables. These experts could include applicants' peers, such as representatives from neighboring education and training providers. The applicant must provide the Department with the results of the review and the qualifications of the reviewer(s) at the time the deliverables are provided to the Department." *Retrieved from:* http://www.doleta.gov/grants/pdf/SGA-DFA-PY-13-10.pdf*. pg. 35.*

"In this SGA, applicants are required to develop new and/or take to scale successful industry sector strategies. These sector strategies must focus on addressing employers' workforce needs by expanding or improving applicants' education and training programs based on the use of both traditional and real-time labor market information. Resources on sector strategies are provided in Appendix A. Effective sector strategies hinge on deep partnerships with employers and regional industry representatives, and where appropriate national industry representatives. To that end, successful applicants will identify one or more specific industry sectors on which they will focus and involve at least two employers, and a regional industry representative, for each targeted sector in each site location served by the program. These employers would either be located in each site or would hire individuals from that region."

Retrieved from: http://www.doleta.gov/grants/pdf/SGA-DFA-PY-13-10.pdf. pg. 16. [Originally published on SkillsCommons at http://support.taaccct.org/faqs/; now found in Compilation of TAACCCT FAQs as of the: August, 25 2016 Version.]

What credentials do Subject Matter Experts need to possess to be considered a subject matter expert? Subject matter experts are individuals with demonstrated experience in developing and/or implementing similar deliverables. These experts could include applicants' peers, such as representatives from neighboring education and training providers. Expertise that is grounded in industry experience is essential for your program to be job-driven workforce development programs. Grantees must provide the Department of Labor with the results of the review and the qualifications of the reviewer(s) at the time the deliverables are provided to the Department. *[Originally published on SkillsCommons at http://support.taaccct.org/faqs/; now found in Compilation of TAACCCT FAQs as of the: August, 25 2016 Version.]*

5.   Are there examples of Subject Matter Expert reports in SkillsCommons to view? Please click the links below to view examples of SME Reports submitted to SkillsCommons:

https://www.skillscommons.org/handle/taaccct/2100

https://www.skillscommons.org/handle/taaccct/3300

[Originally published on SkillsCommons at http://support.taaccct.org/faqs/; now found in Compilation of TAACCCT FAQs as of the: August, 25 2016 Version.]

6.   What are the ETA parameters for the third-party review of deliverables? As indicated in the SGAs, grantees are required to identify third-party subject matter experts to conduct reviews of the deliverables produced through the grants and should allot funds in their budgets for the individual review of their deliverables by subject matter experts.

Grantees should note that the third-party subject matter experts are individuals with demonstrated experience in developing and/or implementing similar deliverables. These experts could include applicants' peers, such as representatives from neighboring education and training providers. The applicant must provide ETA with the results of the review and the qualifications of the reviewer(s) at the time the deliverable is provided to ETA. *[Originally published in FAQ #1 from June 21, 2013]*

7.   Are all of my deliverables required to undergo a third-party review? The intent of the requirement for a third-party review of deliverables is to assess the

quality of substantive deliverables resulting in tangible products that are identified in grantees' Statements of Work. ETA considers substantive deliverables to be those which contain educational content or that document educational structures and processes. Examples include, but are not limited to, curriculum materials, online courses and programs, manuals, and program evaluation results. All deliverables identified in grantees' Statements of Work that meet these criteria should undergo a review. Non-tangible deliverables, such as staff hiring, or deliverables that do not contain educational substance, such as outreach materials or technological infrastructure, are not required to go through the review process. *[Originally published in FAQ #1 from June 21, 2013]*

D.   Accessibility

1.   SGA Requirements for Accessibility: What is the SGA Requirement for Accessibility of grant-created instructional content? Each Round of TAACCCT grant funding has specific SGA requirements. Here are the Accessibility requirements of grant-created instructional content for each Round: Please view the TAACCCT Voluntary Accessibility Summary Template to help grantees meet these requirements posted on the Completing & Closing Out Your Grant page in the Support Center.

For Round 2: "All online and technology-enabled content and courses developed under this SGA must incorporate the principles of universal design (see http://www.cast.org/udl/) in order to ensure that they are readily accessible to qualified individuals with disabilities in full compliance with the Americans with Disabilities Act and Sections 504 and 508 of the Federal Rehabilitation Act of 1973, as amended, and the Web Content Accessibility Guidelines (WCAG) 2.0, Level AA (http://www.w3.org/TR/WCAG/)." *Retrieved 12/5/2014 from: http://www.doleta.gov/grants/pdf/taaccct_sga_dfa_py_11_08.pdf. pg. 8.*

For Round 3: "All online and technology-enabled content and courses developed under this SGA must incorporate the principles of universal design (see http://www.cast.org/udl/) in order to ensure that they are readily accessible to qualified individuals with disabilities. The content and courses must be in full compliance with the Americans with Disabilities Act and Sections 504 and 508 of the Rehabilitation Act of 1973, as amended, and the Web Content Accessibility Guidelines (WCAG) 2.0, Level AA (http://www.w3.org/TR/WCAG/." *Retrieved 12/5/2014 from: http://www.doleta.gov/grants/pdf/taaccct_sga_dfa_py_12_10.pdf. pg. 31.*

For Round 4: "All online and technology-enabled content and courses developed under this SGA must incorporate the principles of universal design (see http://www.cast.org/udl/) in order to ensure that they are readily accessible to qualified individuals with disabilities. The content and courses must be in full compliance with the Americans with Disabilities Act and Sections 504 and 508 of the Rehabilitation Act of 1973, as amended, and the Web Content Accessibility Guidelines 2.0, Level AA (http://www.w3.org/TR/WCAG/)." *Retrieved from: http://www.doleta.gov/grants/pdf/SGA-DFA-PY-13-10.pdf. pg. 35.*

[Originally published on SkillsCommons at http://support.taaccct.org/faqs/; now found in Compilation of TAACCCT FAQs as of the: August, 25 2016 Version.]

E.   SGA Requirement for Creative Commons

1.   What is the SGA Requirement for Creative Commons licensing of grant-created content? Each Round of TAACCCT grant funding has specific SGA requirements. Here are the Creative Commons licensing requirements of grant-created content for each Round. Please view the TAACCCT Voluntary Creative Commons Licensing Summary Template to help grantees meet these requirements posted on the Completing & Closing Out Your Grant page in the Support Center.

For Round 2: "In order to ensure that the Federal investment of these funds has as broad an impact as possible and to encourage innovation in the development of new learning materials, as a condition of the receipt of a TAACCCT grant, the grantee will be required to license to the public (not including the Federal Government) all work created with the support of the grant (Work) under a Creative Commons Attribution 3.0 (CCBY) license. Work that must be licensed under the CCBY includes both new content created with the grant funds and modifications made to pre-existing, grantee-owned content using grant funds.

This license allows subsequent users to copy, distribute, transmit and adapt the copyrighted Work and requires such users to attribute the Work in the manner specified by the grantee. Notice of the license shall be affixed to the Work. For general information on CCBY, please visit http://creativecommons.org/licenses/by/3.0. Questions about CCBY as it applies to specific TAACCCT grant applications should be submitted to DOL to the Grants Management Specialist specified in Section VII." *Retrieved 12/5/2014 from: http://www.doleta.gov/grants/pdf/taaccct_sga_dfa_py_11_08.pdf. pg. 8-9.*

For Round 3: "To ensure that the Federal investment of these funds has as broad

an impact as possible and to encourage innovation in the development of new learning materials, as a condition of the receipt of a TAACCCT grant, the grantee will be required to license to the public all work (except for computer software source code, discussed below) created with the support of the grant under a Creative Commons Attribution 3.0 (CCBY) license.. Work that must be licensed under the CCBY includes both new content created with the grant funds and modifications made to pre-existing, grantee-owned content using grant funds.

This license allows subsequent users to copy, distribute, transmit and adapt the copyrighted Work and requires such users to attribute the Work in the manner specified by the grantee. Notice of the license shall be affixed to the Work. For general information on CCBY, please visit http://creativecommons.org/licenses/by/3.0. Questions about CCBY as it applies to specific TAACCCT grant applications should be submitted to DOL to the Grants Management Specialist specified in Section VII." *Retrieved 12/5/2014 from: http://www.doleta.gov/grants/pdf/taaccct_sga_dfa_py_12_10.pdf. pg. 32.*

For Round 4: "To ensure that the Federal investment of these funds has as broad an impact as possible and to encourage innovation in the development of new learning materials, as a condition of the receipt of a TAACCCT grant, the grantee will be required to license to the public all work (except for computer software source code, discussed below) created with the support of the grant under a Creative Commons Attribution 4.0 (CC BY) license. Work that must be licensed under the CC BY includes both new content created with the grant funds and modifications made to pre-existing, grantee-owned content using grant funds.

This license allows subsequent users to copy, distribute, transmit, and adapt the copyrighted Work and requires such users to attribute the Work in the manner specified by the grantee. Notice of the license shall be affixed to the Work. For general information on CC BY, please visit http://creativecommons.org/licenses/by/4.0 . Instructions for marking your work with CC BY can be found at http://wiki.creativecommons.org/Marking_your_work_with_a_CC_license. Questions about CC BY as it applies to specific TAACCCT grant applications should be submitted to DOL to the Grants Management Specialist specified in Section VII*." Retrieved from: http://www.doleta.gov/grants/pdf/SGA-DFA-PY-13-10.pdf pg. 37. [Originally published on SkillsCommons at http://support.taaccct.org/faqs/; now found in Compilation of TAACCCT FAQs as of the: August, 25 2016 Version.]*

F.   SGA Requirement for Digital Asset Standards

1.   What is the SGA Requirement for Technical/Metadata Standards for Digital Assets? Each Round of TAACCCT grant funding has specific SGA requirements. Here are the metadata standards requirements for each Round. Please view the TAACCCT Voluntary Metadata Standards Summary Template to help grantees meet these requirements posted on the Completing & Closing Out Your Grant page in the Support Center on SkillsCommons.org.

Round 2: "4. Technical Standards for Digital Assets All digital assets within online and technology-enabled courses, including course components, tests, e-publications and applications used in course development under this SGA, should be produced to maximize interoperability, exchange and reuse. In addition, all assessments and/or other content that result in a student score or grade must conform to industry- leading e-learning open standards and specifications (for example, LR [Learning Registry], AICC [Aviation Industry Computer-Based Training Committee], LRMI [Learning Resource Metadata Initiative], IMS [Information Management Standard], PESC [Postsecondary Electronic Standards Council], or SCORM [Shareable Content Object Reference Model]). Applicants must identify the industry standard they will use in online course development. All digital assets must be licensed for free, attributed public use and distribution under the CCBY license (as described in Section I.D.5). Applicants are also encouraged to share, where available, anonymous data on learning and usage." *Retrieved 12/11/14 from*
http://www.doleta.gov/grants/pdf/taaccct_sga_dfa_py_11_08.pdf pg. 8

Round 3: "7. Technical Standards for Digital Assets (All Applicants)
All digital assets within online and technology-enabled courses, including course components, tests, e-publications and applications used in course development under this SGA, should be produced to maximize interoperability, exchange and reuse. In addition, all assessments and/or other content that result in a student score or grade must conform to industry-leading e-learning open standards and specifications (for example, LR [Learning Registry], AICC [Aviation Industry Computer-Based Training Committee], LRMI [Learning Resource Metadata Initiative], IMS [Information Management Standard], PESC [Postsecondary Electronic Standards Council], or SCORM [Shareable Content Object Reference Model]). Applicants must identify the industry standard they will use in online course development. All digital assets must be licensed for free, attributed public use and distribution under the CCBY license (as described in Section III.D.9).

Additional information regarding the formats of digital assets is contained in Appendix B." *Retrieved 12/11/14 from* http://www.doleta.gov/grants/pdf/taaccct_sga_dfa_py_12_10.pdf *pg. 31 (see also, pg 72)*

Round 4: "6. Technical Standards for Digital Assets All digital assets within online and technology-enabled courses, including course components, tests, e-publications and applications used in course development under this SGA, should be produced to maximize interoperability, exchange, and reuse. In addition, all assessments and/or other content that result in a student score or grade must conform to industry-leading e-learning open standards and specifications for meta-data (LR [Learning Registry] and LRMI [Learning Resource Metadata Initiative]), packaging standards for aggregate level resources (AICC [Aviation Industry CBT Committee], IMS [IMS Global Learning Consortium], or SCORM [Sharable Content Object Reference Model]), and standards for data sharing (PESC [Postsecondary Electronic Standards Council])." *Retrieved 12/11/14 from* http://www.doleta.gov/grants/pdf/SGA-DFA-PY-13-10.pdf *pg. 36 (see also, pgs. 100 and 104)*

G.   CC BY License

1.   How Do We Apply the CC BY License to Our Materials? Licensing material entails adding a notice that material is available under the CC BY license. Grantees are responsible for adding the CC BY license notice to materials according to CC best practices at http://wiki.creativecommons.org/Marking. In addition, grantees will select the CC BY license upon submission of materials to www.Skillscommons.org. For more information, see https://creativecommons.org/faq/#how-do-i-apply-a-creative-commons-license-to-my-material. There is no registration or procedure to obtain a CC BY license. *[Originally published in "Round 2 Grant Closeout Finishing Strong" Webinar from November 5, 2015]*

2.   May We Use Creative Commons Attribution 4.0 (CC BY) License on Our Deliverables? Creative Commons Attribution 4.0 is the next generation of CC licenses that have been released since the writing of the SGA. This updated version is a more user-friendly and internationally robust version of the 3.0 requirement, though the versions are mutually compatible. More information about the versions can be found here: http://creativecommons.org/version4. Grantees are encouraged to choose to use the version that best meets their needs. For additional information, please contact taa@creativecommons.org. *[Originally published in "Round 2 Grant Closeout Finishing Strong" Webinar from*

November 5, 2015]

3.   What is the Creative Commons licensing requirement for a course that is a mix of content developed using TAACCCT grant funds with existing content that was not developed with TAACCCT grant funds? Are we required to apply a CC BY license and upload all of the course content to SkillsCommons or just the portion developed with TAACCCT grant funds? You are only required to apply the CC BY license to the course content developed with TAACCCT grant funds and then upload this content to SkillsCommons. In addition, if the previously created content was modified with TAACCCT grant funds, the revised content must be released with a CC BY license and uploaded to SkillsCommons.

In the spirit of OER, grantees are encouraged to apply CC BY license to the entire course and upload it to SkillsCommons. This will provide wider recognition of your efforts. You can also apply alternative Creative Commons licenses to the previously created content (e.g. CC BY-SA) that might be more acceptable to the authors of the content. Adding Creative Commons licenses and uploading the content to SkillsCommons provide opportunities for a wider audience to review, use, and build on your work.

If you do not upload the previously created content, it would be very helpful if you included a description of the additional resources used in your course so that people reviewing your submitted resources have a better understanding of the entire course context and content. *[Originally published on SkillsCommons at* [*Cpport.taaccct.org/faqs/*](Cpport.taaccct.org/faqs/)*; now found in Compilation of TAACCCT FAQs as of the: August, 25 2016 Version.]*

4.   Is there information on CC BY licensing and commercial vs. non-commercial use? There are Creative Commons licenses that don't allow others to make commercial use of works. However, for TAACCCT-funded grant deliverables, the U.S. Department of Labor has mandated that all Open Educational Resources (OER) works created with grant funds must be licensed CC BY, so grantees cannot choose other Creative Commons licenses. The reason is that TAACCCT grant funds are public taxpayer money and the public (including businesses) should have access and rights to use what it has funded. *[Originally published on SkillsCommons at* [*http://support.taaccct.org/faqs/*](http://support.taaccct.org/faqs/)*; now found in Compilation of TAACCCT FAQs as of the: August, 25 2016 Version.]*

5.   How do I add the DOL disclaimer and Creative Commons license to software code that we developed with the TAACCCT grant funding? Creative

Commons licenses are designed for content and not software code so you won't add the Creative Commons license to the software code. All software code should have documentation to describe the software code structure and strategy and the software documentation developed with TAACCCT grant funding must have the CC BY license and DOL disclaimer in the document. Creative Commons has recommendations on their FAQ page about open licensing of software code.

SkillsCommons recommends against using Creative Commons licenses for software and strongly encourages grantees to use one of the very good software licenses which are already available. SkillsCommons recommends considering licenses made available by the Free Software Foundation or listed as "open source" by the Open Source Initiative. Unlike software-specific licenses, CC licenses do not contain specific terms about the distribution of source code, which is often important to ensuring the free reuse and modifiability of software. Many software licenses also address patent rights, which are important to software but may not be applicable to other copyrightable works. Additionally, SkillsCommons licenses are currently not compatible with the major software licenses, so it would be difficult to integrate CC-licensed work with other free software. Existing software licenses were designed specifically for use with software and offer a similar set of rights to the Creative Commons licenses.

Version 4.0 of CC's Attribution-ShareAlike (CC BY-SA) license is one-way compatible with the GNU General Public License version 3.0 (GPLv3). This compatibility mechanism is designed for situations in which content is integrated into software code in a way that makes it difficult or impossible to distinguish the two. There are special considerations required before using this compatibility mechanism. Also, the CC0 Public Domain Dedication is GPL-compatible and acceptable for software. For details, see the relevant CC0 FAQ entry. While SkillsCommons recommends against using a CC license on software itself, CC licenses may be used for software documentation, as well as for separate artistic elements such as game art or music. *[Originally published on SkillsCommons at http://support.taaccct.org/faqs/; now found in Compilation of TAACCCT FAQs as of the: August, 25 2016 Version.]*

5.   Are there any good examples in the repository with the CC BY license on them? The University of Alaska Anchorage has submitted good examples of documents with CC BY licensing on them to the Repository. You can review their submissions here:

https://www.skillscommons.org/handle/taaccct/264

6. Can grant funds be used to purchase iStockphotos and other royalty-free stock photos, illustrations, music, and videos in our course material and promotional material? Yes, grant funds can be used to purchase iStock and other stock photos, illustrations, music, and videos for course and promotional materials. However, we recommend free, openly licensed alternatives, which are readily available for many cases. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

7. If proprietary licensed material is being mixed with new OER materials, what license(s) should be used? Grantees cannot put a CC BY license on works that are purchased from iStock or other sources, as the grantee is not the creator or rights holder. So, if grantees are mixing these works with new content that are being authored then a statement needs to be included that states: "Except where otherwise noted these materials are licensed Creative Commons Attribution 4.0 (CC BY)." Then, wherever the proprietary, purchased material is used it must be stated that there is a copyright for example, "Photo title x © iStock used with permission." A grantee can indicate how others can also find and purchase the rights to use it if they want. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

8. Can purchased or royalty-free stock photos, illustrations, music, and videos be uploaded to SkillsCommons? Use of proprietary, purchased materials is described in Question 7 above. However, unless a grantee receives permission from the licensee to upload the purchased content to SkillsCommons, all proprietary material must be removed before uploading it to SkillsCommons. A grantee may put a statement that says what the proprietary material is and ideally a link to where others can find it from the publisher and arrange for their own rights to use. *[Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]*

H. Required Disclaimer

1. Do we need to include the Disclaimer of the U.S. Department of Labor as the Funder of the Project on the materials we are uploading to SkillsCommons? If applicable, the following language from Round 2, 3, and 4 SGAs needs to be on all products developed in whole or in part with grant funds:

"This workforce product was funded by a grant awarded by the U.S. Department of Labor's Employment and Training Administration. The product was created by the grantee and does not necessarily reflect the official position of the U.S. Department of Labor. The U.S. Department of Labor makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information on linked sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership."
[Retrieved 7/20/2016 http://www.doleta.gov/grants/pdf/SGA-DFA-PY-13-10.pdf pg. 38.] [Newly published in Compilation of TAACCCT FAQs Version: August, 25 2016.]

VI. EXTENSION OF PERIOD FOR GRANT-FUNDED PROGRAM ACTIVITIES

The SGAs for TAACCCT Rounds 2, 3, and 4 originally stipulated that the fourth year of the grant would be for follow-up and evaluation only and that no program development or delivery activities could be funded by the grant. ETA has now determined that these rounds may use up to six months of this fourth and final year to continue grant-funded program activities. This FAQ provides information to elaborate on the six-month extension of grant-funded program activities, including related performance reporting questions. *[Originally published in FAQ #6 from March 30, 2016; updated to include Round 4 in Compilation of TAACCCT FAQs Version: August, 25 2016]*

A. General Questions

1. Do I need a modification to take advantage of this? Where can I get a copy of the official letter that was sent to Round 2, 3, and 4 grantees? No, you do not need a modification. A letter from the grant officer was sent to each Round 2, 3, and 4 grantee. If you need a copy, please request it from TAACCCT@dol.gov, and copy your FPO. *[Originally published in FAQ #6 from March 30, 2016; updated to include Round 4 in Compilation of TAACCCT FAQs version: August, 25 2016]*

2. Was I or am I required to use the extension of time for program activities? No. The extension is optional. Grantees may use all or only part of the six months that were granted during the final year. *[Originally published in FAQ #6 from March 30, 2016; updated to include Round 4 in Compilation of TAACCCT FAQs version: August, 25 2016]*

3. Why was the extension granted for six months? It ends mid-semester,

which is an inconvenient time for program activities to end. The original date for ending grant-funded program activities was September 30. The extension was designed to allow grantees to complete their fall semesters ending in December and to allow an additional three months for grant-funded job placement activities, prior to using the final six months for follow-up and evaluation purposes only. Other approaches can be used, as long as grant-funded program activities end on March 31. *[Originally published in FAQ #6 from March 30, 2016; updated to include Round 4 in Compilation of TAACCCT FAQs version: August, 25 2016]*

B.   Counting Participants during Extension

1.   Because the extension of program activities ends mid-semester, can I count participants who haven't completed their courses or programs in B.3 as having been retained if they are still enrolled on March 31? Treat March 31 as if it were September 30, the end of your program year with regard to your participants. If the participant is still enrolled, count them in B.3 and stop tracking them for reporting purposes (unless they are incumbent workers, in which case you would continue to track and report them in B.10 as applicable). Starting on April 1, you will be only tracking follow-up outcomes for completers who have exited (B.7-B.9, as appropriate) and for incumbent workers (B.10) *[Originally published in FAQ #6 from March 30, 2016; updated to include Round 4 in Compilation of TAACCCT FAQs version: August, 25 2016]*

2.   The extension ends mid-semester. What do I do about counting participants who won't complete or get credentials or credits until the end of the semester (i.e., May or June) if the six-month extension ends March 31? If you are operating on a traditional semester schedule, you may not be able to count certain program related outcomes, for example, for those students who do not complete their courses or programs by March 31. Review the chart below to help determine which outcomes may be relevant during each month (as applicable to each student). *[Originally published in FAQ #6 from March 30, 2016; updated to include Round 4 in Compilation of TAACCCT FAQs version: August, 25 2016]*

3.   The form in the OMB package shows the performance outcomes that are related to program activity (i.e., B.1-B.6) blacked out for the fourth year. Do I have to report these outcomes in my final fourth year report if I take the six-month extension of program activity? Yes. The OMB package form is purposely aligned with the original design of the grant requirements in the SGA for each round. Because the fourth year was originally designed to be a follow-

up year only, outcomes related to program activities were shown to be unnecessary to report. However, the SGAs state that the grantees must agree to meet all DOL reporting requirements. By opting to extend program activities into the fourth year and using grant funds to enroll participants, grantees agree to report on those participants in the participant-related outcomes (B.1-B.6) during the applicable time period in the fourth year, in addition to any of the other follow-up outcomes as applicable during the entire fourth year. *[Originally published in FAQ #6 from March 30, 2016; updated to include Round 4 in Compilation of TAACCCT FAQs version: August, 25 2016]*

4.   During the final year if I use any part of the extension of program activities, which outcomes do I track and report? All of the outcomes, as applicable, may be relevant, but only until March 31 at the latest (depending on the length of the extension you have selected). Beginning on April 1, you should only track follow-up outcomes, B.7-B.10, regarding enrollment into further education and employment outcomes, as applicable to your participants. *[Originally published in FAQ #6 from March 30, 2016; updated to include Round 4 in Compilation of TAACCCT FAQs version: August, 25 2016]*

See Appendix A for Figure 1: Operating on a Traditional Semester Schedule: Which Outcomes *May* Count in the Fourth Year if Six-Month Extension is Taken (if applicable)

C.   Allowable Expenses after March 31st

1.   What can be paid for with grant funds after March 31? Grant funds can be used to pay for follow-up and evaluation activities, such as tracking employment data, completing reports and finalizing evaluations. Preparing deliverables for Skillscommons.org is also an allowable expense. If there are continuing expenses for TAACCCT courses after March 31 (e.g., instructor salaries), these must be paid for out of non-TAACCCT funds after this date. *[Originally published in FAQ #6 from March 30, 2016; updated to include Round 4 in Compilation of TAACCCT FAQs version: August, 25 2016]*

2.   During the final six months of the grant, can I use grant funds to pay for reviewing (including third party review), finalizing, and posting grant deliverables (e.g. curriculum, course materials, etc.) to Skillscommons.org? While the TAACCCT Round 2, 3 and 4 SGAs state that grantees may not use grant funding for program activities during the final 12 (now six) months, the SGAs do not specifically discuss the allowability of deliverable-related costs in the final phase of the grant. However, costs related to finalizing deliverables are not viewed as program development or delivery, and accordingly, grantees may

continue to incur costs for these activities throughout the entire grant period. This is in keeping with the capacity-building goals of the TAACCCT program, and will help to ensure that grantees have sufficient time to properly package their products for broad dissemination and use. *[Originally published in FAQ #6 from March 30, 2016; updated to include Round 4 in Compilation of TAACCCT FAQs version: August, 25 2016]*

VII. CLOSEOUT FOR TAACCCT 2/3/4 GRANTEES

The most recent FAQ published on the topic of grant closeout was titled "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016. That FAQ aligns closely to the previous FAQ titled "Frequently Asked Questions about Grant Closeout For Round 2 Grantees" published on June 24, 2015. Since the FAQ published for round 3 grantees is the most relevant and applicable to rounds 2, 3 and 4 grantees, it will be cited for the remainder of this section.

A. General Information on TAACCCT Closeout

1. Where Can I Find Additional Information about the ETA Closeout Process? Specific regulations that define the grant closeout requirements can be found in 29 CFR Part 95.70-73, Subpart D, "After-the-Award Requirements," and 29 CFR Part 97.50-52, Subpart D, "After-the-Grant Requirements." In addition, closeout resources, including the Grantee Closeout System End User Manual and a Grant Closeout FAQ can be found at: http://www.doleta.gov/grants/grant_closeout.cfm*. [Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

2. What is Grant Closeout? Grant closeout is the completion of the grant life cycle and the official end of the government's relationship with grantees. *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

3. When is the Grant Closeout Period? Grant closeout refers to the period 90 days following the expiration of the grant period of performance. The period of performance for Round 2 grants will end on September 30, 2016, with grant-funded program activities allowable through March 30, 2016. The period of performance for Round 3 grants will end on September 30, 2017, with grant-funded program activities allowable through March 30, 2017 *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3*

Grantees" published May 12, 2016.]

4.   When Will ETA Begin the Grant Closeout Process with Grantees? A grant closeout specialist from the Department's Division of Policy, Review, and Resolution (DPRR) will be assigned to each grant. This closeout specialist will send an initial closeout notification letter to grantees 7 days prior to period of performance end date *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

5.   Who Will Receive the Final Grant Closeout Notification? The closeout package will be sent via email to your grant's signatory official. For TAACCCT Round 3 grantees, consortium members (each grantee with a grant number) will receive individual close-out packages. However, performance reporting activities will continue to be the responsibility of consortium leads. All consortium members must provide leads with the information they are required to submit for performance reporting on a timely basis.

The signatory official is the authorized representative identified on item 21 of the SF-424 Application for Federal Assistance. If you have not received a package by the time the grant has expired, please contact your Federal Project Officer (FPO) to ensure that the authorized representative's email address is correct. This name and email may be different than names and/or email addresses provided for quarterly reporting purposes. *If the signatory authorized representative has changed since the inception of the grant to the closeout, please reach out to your FPO prior to closeout to initiate a modification. [Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

B.   Extension Requests

1.   Can Grantees Receive an Extension to the Grant Closeout Period? An extension to the closeout period will be considered and approved on a case-by-case basis. A request can be made through the grants closeout system during the 90-day closeout period. Please see page 31 of the Grant Closeout System End User Manual for additional information. *http://www.doleta.gov/grants/docs/GCS.pdf [Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

C.   Financial Closeout

1.   Will SOL Request Details on Administrative Cost Calculations or

Leveraged Resource Calculations or Anything Else in Addition to the ETA-9130?
Administrative costs are to be reported on the ETA-9130 as well as the final and closeout ETA-9130 reports. Leveraged resources will be reported in the recipient's share section of the final and closeout ETA-9130.

The grant closeout package will contain all of the necessary forms. It will contain both financial data and performance data. A Closeout Handbook with screen shots of closeout package materials is available at http://www.doleta.gov/grants/docs/closeout_handbook.pdf. *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

2. **Please Provide a Summary of All Required Financial Reports and ETA's Expectations for Closeout Financial Reporting. Are There Any Supplemental Financial Reports Required At Grant End?** Within 45 days after the period of performance end date, grantees must submit:

- FINAL ETA 9130 – submitted via the Grantee Reporting System https://www.etareports.doleta.gov/CFDOCS/grantee_prod/reporting/index.cfm [Note that this link is password protected; grantees will receive access at the appropriate time.]

    NOTE: Be sure to mark Line 6 as "Final"

Before 90 days after the period of performance end date, grantees must submit all closeout documentation as described in 29 CFR 95.71(a) and 29 CFR 97.50(b) through the Grant Closeout System:

- CLOSEOUT ETA 9130 – submitted via the Grant Closeout System along with the closeout grant package.

- Grantee Release

- Government Property Inventory Certification, Inventory List

- Grantee's Detail Statement of Costs, NICRA & breakdown

- Grantee's Assignment of Refunds, Rebates and Credits

- Grantee's Close-out Tax Certification

For more information on this, please visit http://www.doleta.gov/grants/grant_closeout.cfm *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

3. **Will We Be Asked To Provide A Report of Ending Financial Information**

That Describes the SF-424A Categories? Yes. Grantees will be required to provide a Detailed Statement of Costs that will be consistent with the cost categories contained in the SF-424A budget. *[Originally published in "Round 2 Grant Closeout Finishing Strong" Webinar from November 5, 2015]*

4.   What Activities (Programmatic & Fiscal) Must Cease By the End of the Grant Period? When a funding period for incurring expenditures is specified the grantee may charge the grant allowable expenditures incurred during the funding period. No additional costs may be incurred after the expiration of the grant. Grantees must liquidate expenditures (pay bills) properly incurred during the award and have 90 days to do so. The Closeout Grant Officer may consider and extend the 90-day timeframe at the request of the grantee. Any costs incurred after the expiration of the grant are unallowable as direct costs.

An example of allowable liquidation of expenditures is the payment of staff salaries accrued during the period of performance, but for which pay day falls after the end date of the grant. Please remember that a grantee cannot deviate from their established personnel and payroll policies to accrue more salary expenses during closeout.

REMINDER: ETA requires grantees to report all financial transactions on a full accrual basis. An accrued expenditure is defined in the ETA-9130 form instructions and in TEGL 28-10 Federal Financial Management and Reporting Definitions as "costs for goods or services received regardless of whether payment has been made". See 20 CFR 667.107(2)(e) for additional information of period of availability. *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

5.   Can We Charge Staff Time for Closeout Activities to the Grant? If grant funds cannot be used following the end of the period of performance, how do grantees reimburse for staff salaries for closeout activities such as performance reporting? Under your grant, there are direct and indirect costs. Under the OMB cost principles (2 CFR 220, 225, 230), direct costs are those that can be identified specifically with a particular final cost objective, i.e., a particular award, project, service, or other direct activity of an organization. Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective. After direct costs have been determined and assigned directly to awards or other work as appropriate, indirect costs are those remaining to be allocated to benefiting cost objectives. A cost may not be allocated to an award as an indirect cost if any other cost

incurred for the same purpose, in like circumstances, has been assigned to an award as a direct cost.

Examples of indirect costs may include depreciation or use allowances on buildings and equipment, the costs of operating and maintaining facilities (overhead), top management personnel, fiscal operations, HR, payroll, and general administration and general expenses. Ordinarily, allowance for these types of costs will have been included in the organization's indirect cost pool and funded through the application of the approved indirect cost rate across all federal grants. Further explanation of this process is described below:

If your organization has more than one federal award, you likely have an indirect cost rate that was negotiated with your federal cognizant agency. Closeout activities may be performed by individuals included in your indirect cost pool and their costs are thus recouped through the indirect charges under your rate made across all your federal grants. Therefore, if the closeout activities under your grant are part of your indirect cost pool, those costs are not direct chargeable to the grant and would be part of the indirect costs recovered for your grants. However, after the end date of your grant, you would NOT be able to charge indirect costs, as there are no direct costs to apply your rate to.

If your organization does not have an indirect cost rate, but rather an approved cost allocation plan, or closeout activities have been assigned to an individual that has direct charged the grant, then they may not be reimbursed by ETA or any other grant award as they are directly associated with your ETA grant award.

In the case where closeout activities are direct costs, the grantee must plan in advance to complete all closeout activities prior to the end of the period of performance. A grantee should be in touch with their FPO immediately to connect with ETA's closeout unit to initiate closeout activities. This may entail ending any activities that incur new costs BEFORE the end of the period of performance to allow a window to liquidate the expenditures before the grant ends.

Finally, if your grant has a 'sustainability' plan in place, it may identify other resources to sustain the project which may be used to support closeout activities. *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

6.   Please Summarize ETA Expectations for Liquidating Obligations. If services or goods have not been rendered or received prior to the expiration of the grant period, then any liquidation of existing obligations can <u>NOT</u> occur. As

previously stated, the only liquidation that occurs during closeout is the liquidation of accrued expenditures – goods or services rendered or received during the period of performance. *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

7.   Can You Prepay for Activities that Occur After the End of Grant Period of Performance? Record retention costs, including record storage and audit costs, if not provided for in the indirect cost pool, may be prepaid during the funding period if permissible under grantee institutional procedures. *[Originally published in "Round 3 Grant Closeout FAQ for Round 3 Grantees dated May 12, 2016]*

8.   What Is the Latest Date That Final Bills Need to Be Submitted? The closeout period is 90 days. All bills must be paid within 90 days of the end of the period of performance. Grantees should consider alerting any vendors, contractors, and sub-awardees of the deadline to ensure the timely submission of all invoices. *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

9.   How Do We Deal With Pending And Late Claims for Reimbursement and Uncashed Checks? Please adhere to state and local escheat laws governing unclaimed property. Additionally, the grantee must complete a form called Grantee's Assignment of Refunds, Rebates and Credits to the DOL-ETA (ETA 3-107) which is further described in the Grant Closeout System End-User Manual beginning on page 14. http://www.doleta.gov/grants/docs/GCS.pdf *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

10.   Please Share ETA's Expectations for the Management and Disposition of Property. The grantee must account for all equipment and complete a Property Certification Form. Equipment is defined as tangible nonexpendable personal property including exempt property charged directly to the award having a useful life of more than one year and an acquisition cost of $5,000 or more per unit. The disposition of equipment must follow the guidelines specified in 29 CFR 97.32 and 29 CFR 95.34 and further illustrated in Chapter II-11 of the One-Stop Comprehensive Financial Management Technical Assistance Guide. Supplies are defined as all personal property excluding equipment, intangible property, and debt instruments as defined in this section, and inventions of a contractor conceived or first actually reduced to practice in the performance of work under a funding agreement ("subject inventions"), as defined in 37 CFR part 401, "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms

Under Government Grants, Contracts, and Cooperative Agreements. [29 CFR 95.2]. Real property is defined as land, including land improvements, structures, and appurtenances thereto, excluding movable machinery and equipment. [29 CFR 97.3] Real property includes, but is not limited to, real property acquired before publication of these regulations and real property transferred from prior years. [29 CFR 95.2]

Acquisition of Real Property is prohibited under these grants; therefore, the items in question would fall under equipment or supplies. For example, office supplies that do not meet the definition of equipment, would be considered supplies and therefore not inventoried and do not need disposition instructions. A reminder – equipment is considered on a unit basis – meaning all the components required to make it functional – so while individual pieces may be less than $5000, if the functional unit total cost is greater than $5000, those combined pieces are considered equipment and must be inventoried and get disposition instructions if sold.

1) **Grantee may retain equipment for use on the same project or program for which it was acquired under the grant:** Your organization may retain the equipment to be used for the purpose under which it was acquired under the grant as described in 29 CFR 95.34(c) and 29 CFR 97.32(c), whether or not the project or program continues to be supported by federal funds. If you elect this option, please indicate your intent on your submission. A copy of the organization's inventory listing and related documentation will become a part of the official closeout grant file.

2) **Grantee may retain equipment for use on other federally sponsored activities:** Your organization may use the equipment in connection with its other federally sponsored activities as described in 29 CFR 95.34(c)(1) and (2) and 29 CFR 97.32(c)(1) and (2). If you elect this option, please indicate your intent on your submission. A copy of the organization's inventory listing and related documentation will become a part of the official closeout grant file.

3) **Grantee may retain equipment for non-federally supported activities:** Your organization may retain the equipment for use on other non-federally supported activities as described in 29 CFR 95.34(g) and 29 CFR 97.32(e)(1) and (2). If you elect this option, please indicate your intent on your submission. Also, be aware that compensation must be provided to ETA as described in 29 CFR 95.34(g) and 29 CFR 97.32(e)(2) as appropriate. A copy of the organization's inventory listing and related documentation will become a part of the official closeout grant file.

4) **Grantee may dispose of the equipment by sale(s) or other means:** If the organization determines that there is no further use for equipment purchased with ETA grant funds, the grantee is responsible for disposition of said equipment in accordance with 29 CFR 95.34(g) and (g)(1) or 29 CFR 97.32(e)(1) and (2) utilizing several methods (transfer, sale, scrap or other means). Items sold should be reported to DOL as recipients are required to reimburse the DOL agency an amount computed by applying to the sales proceeds the percentage of Federal participation in the cost of the original project or program minus $500 or ten percent of the proceeds, whichever is less, for the recipients selling and handling expenses. Please remit payment, along with a brief statement explaining the nature of the return to:

U.S. Department of Labor
Employment and Training Administration
Office of Grants Management
200 Constitution Avenue, N.W. Rm. N-4716
Washington, D.C. 20210
Attn: Closeout Grant Officer

[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]

11.   Does the DOL Perform a Final Monitoring Visit After Grant Closeout? If so, when will this monitoring occur? Monitoring is typically conducted throughout the life of the grant; however, if there are significant issues related to questioned costs, it could take place after the grant period. *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

12.   Can I Provide Staff With A Severance Package? Providing severance packages is dependent on the following: Costs must be reasonable and necessary and the local personnel policies governing severance packages must apply to all staff, not just grant funded staff, and had to be in effect prior to the issuance of the grant or period of availability. *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

13.   What Happens If Our Project Did Not Spend the Entire Amount of the Grant Funds Awarded? Any unexpended funds will be de-obligated and returned to the Department during the closeout process. *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

14.   Can I Use the Remaining Grant Funds to Purchase Equipment? No new purchases can occur during closeout. In all cases, the grantee must obtain prior approval before purchasing equipment. If the request is submitted in the last few remaining months of the grant, it is highly unlikely such request will be granted. *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

15.   What Should We Do if We Used a Provisional Indirect Cost Rate During the Grant Period but Receive a Final Rate During Closeout?
Since the final rate would be applicable to a period of performance that occurred prior the closeout, the grantee should make the necessary adjustments to expenses and submit an amended closeout package. *[Originally published in "Frequently Asked Questions about Grant Closeout For Round 3 Grantees" published May 12, 2016.]*

D.   Performance Requirements for Closeout

1.   When Are the Final Reports Due? Within 45 days after the period of performance end date grantees must submit:

- FINAL Quarterly Narrative Progress Report (QNPR) – submitted via the Grantee Performance Reporting System
https://www.reports.doleta.gov/CFDOCS/grantee_prod/reporting/index.cfm
. The Final QNPR will provide information on grant activities during the last quarter and cumulative information on grant activities during the entire period of performance

- FINAL Annual Performance Report (APR) – submitted via the Grantee Performance Reporting System
https://www.reports.doleta.gov/CFDOCS/grantee_prod/reporting/index.cfm

There are no supplemental performance reports required at the grant's end.

[Originally published in "Round 3 Grant Closeout FAQ for Round 3 Grantees dated May 12, 2016]

2.   Do We Report Cumulative Data in the Final APR? No. The Final APR will provide information on grant activities during the time period since your most recent APR was submitted (i.e., only for Year 4). Do not provide cumulative information – the system will calculate cumulative numbers using the "thermometer" report. *[Originally published in "Round 3 Grant Closeout FAQ for Round 3 Grantees dated May 12, 2016]*

3.   What Should We Report in the Final APR? If you used any part of the final year as an extension of program activities, you should report on *all* outcomes (B.1 through B.10) achieved during the period of grant-funded program activities (e.g., during months 37-42 for grant-funded activities during that time). You should report all follow-up outcomes (B.7, B.8, B.9 and B.10) that occurred *during the entirety of Year 4*. Figure 1 in Appendix A summarizes how to report fields B.1 – B.10 in the final APR. *[Originally published in "Round 3 Grant Closeout FAQ for Round 3 Grantees dated May 12, 2016]*

4.   How Do We Report Additional Follow-Up Outcomes That Were Achieved During the Grant Closeout Period? If a student meets the definition of B.8 or B.9 during the closeout period (Oct. 1 – Dec. 31) you may count them in B.8 or B.9 as a follow-up outcome. *Report the numbers you have by the final report due date*. If you want to amend your reports with these follow-up outcomes after the due date, contact your FPO to request that your final APR be unlocked. *[Originally published in "Round 3 Grant Closeout FAQ for Round 3 Grantees dated May 12, 2016]*

5.   What is the Last Date that We Can Re-Open Our Final APRs to Enter Follow-Up Information on Participants? Due to the lag in the receipt of wage record and survey data, you may request to re-open the final APR for up to one year after your grant ends, to enter any follow-up participant outcomes (outcomes B.7, B.8, B.9 and B.10). The follow-up outcomes must have been achieved during the time periods illustrated in Figure 1. *[Originally published in "Round 3 Grant Closeout FAQ for Round 3 Grantees]*

VIII.   Appendix A

Figure 1: Operating on a Traditional Semester Schedule:

Which Outcomes *May* Count in the Fourth Year if Six-Month Extension is Taken (if applicable)

													Closeout		
Outcome	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	*Oct*	*Nov*	*Dec*
B1 (participants)															
B2/B2a (completers)**															
B3 (retained in program of study)															
B4 (retained in other)															
B5/B5a (credits)**															
B6/B6a/B6b/B6c (credentials)**															
B7 (further education)															
B8 (employment)															
B9 (emp retention)															
B10 (wage increase)	*	*	*	*	*	*	*	*	*	*	*	*			

*Incumbent workers only

**For this chart, the shaded sections refer to completers, credits, and credentials under a traditional semester schedule; non-traditional schedules may have completers, credits and credentials through March.