

## Youth CareerConnect Programmatic Closeout FAQ

Updated (December 13, 2018)

### 1. Are there any additional reports that need to be submitted? (other than the final quarterly report)?

- A. In general 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](https://www.etareports.doleta.gov/CFDOCS/grantee_prod/reporting/index.cfm)
  - Quarterly Performance Report, uploaded to the Mathematica FileXChange site at: <https://ycc-pts.com/FX>
  - Quarterly Narrative Report, uploaded to the Mathematica FileXChange site at: <https://ycc-pts.com/FX>
- B. Within 90 calendar days after the period of performance end date, grantees must submit all closeout documentation (see below) as described through the Grant Closeout System:
  - Closeout 9130
  - Grantee's Release
  - Government Property Inventory Certification
    - Inventory List (if applicable and the fair market value must be \$5,000 or over)
  - Grantee's Detail Statement of Costs
    - NICRA & breakdown (if the grant is charging indirect cost)
  - Grantee's Assignment of Refunds, Rebates and Credits
  - Grantee's Close-out Tax Certification

### 2. How long should grant records be kept, including student records and files?

- A. The requirements for record retention, under the Uniform Guidance, provides for a retaining period of not less than 3 years from the date of submission of the final expenditure report.

Although this is a general rule, there are exceptions which may extend the retention period beyond the three (3) years period. Record retention requirements may be found at [2 CFR 200.333](https://www.ecfr.gov/current/title-2/chapter-II/subchapter-A/part-200/subpart-B/section-200.333)

## ORIGINAL FAQ

**1. The period of performance end date for these grants is September 30, 2018. Since YCC grants do not have a follow-up period, can grantees use grant funds to pay student tuition for the fall of 2018?**

A. In general, grantees cannot use grant funds past the end of their grant period of performance. Grantees may expend funds for services and activities that are allowable and allocable to the grant during their period of performance.

**2. Is it possible to extend the period of performance date to December 31, 2018, or through the end of the school year of spring 2019?**

A. For discretionary grants such as Youth CareerConnect, period of performance extensions are granted in accordance with the Office of Grants Management guidance which states that grantees may receive one period of performance extension of up to 12 months total. Requests must fully justify the reason why more time is needed and describe:

- circumstances, challenges, or problems that created the need to extend the period of performance and listing the remaining funds to be expended;
- efforts to address the challenges and the corrective actions or changes that have or are being made to assure grant success;
- activities that can be accomplished by the original grant period of performance; and
- the specific activities that will be accomplished in the extended period of performance, including an updated timeline of grant activities, outcomes and deliverables that will be achieved, and an updated budget (SF424a) with a detailed budget narrative.

A. A grantee may not be eligible for a no-cost extension if the grantee has been non-responsive to technical assistance or not provided documentation as requested by ETA (revised timelines, budget re-alignment/narrative etc.) in order for the grant to be successful.

**3. What would be the timeline for requesting a period of performance (no cost) extension?**

A. Requests should not occur during the first two thirds of the original operating period. The Department of Labor exceptions at 2 CFR 2900.10 requires grantees to submit a request at least 30 days prior to the expiration date. You should let your FPO know as soon as possible if you are planning to submit a request for a no-cost extension.

**4. Must acquisitions be in possession for 1 year prior to grant end?**

A. In general, grantees may not purchase equipment in the last funded year of the grant except under limited instances determined on a case-by-case basis. Similarly, if you received prior approval to purchase equipment from your Grant Officer but the purchase did not occur before the last funded year of the grant, the approval is automatically rescinded, as written in your grant terms. Check your grant award for your

specific terms. Please be reminded that prior approval is always required for equipment purchases/leases, even if the request to purchase equipment is already specified in your SOW and/or budget.

**5. How should the following statement from Core Element # 5, Program Sustainability, be applied to YCC grants?**

*“DOL expects that every cohort of participants enrolled using grant funds will be provided the same level of program services and activities, even if they are not anticipated to graduate from the program during the grant’s period of performance.”*

- A. YCC grants were intended to institutionalize key elements of the YCC program (e.g., integrated, contextualized academic and technical curriculum, work experience, opportunities to earn credit for post-secondary education and training, professional development for teachers, etc.) after the grant ends. To the best of grantee’s ability, grantees should provide these key elements to participants enrolled during the grant program who, by the end of the grant period, have not yet completed the key YCC program elements.
- B. Grantees are expected to enroll 4 cohorts of participants – 1 cohort in each full year of the grant. . The last cohort of grant-funded participants is enrolled for the 2017-2018 school year. For example at the end of the grant period (September 30, 2018) in a 9 – 12 grade model, grantees would have remaining in high school:
- cohort of 12th graders (enrolled in year 2)
  - cohort of 11th graders (enrolled in year 3)
  - cohort of 10th graders (enrolled in year 4)

To the best of a grantee’s ability using leveraged resources identified to sustain the program beyond the life of the DOL grant, grantees should continue to provide the key elements of the YCC program to these remaining students.

**6. How long will the Participant Tracking System (PTS) be available for grantees to use?**

- A. The PTS will be available until approximately November of 2019.

**7. When does PTS data for the last quarter of the grant need to be entered?**

- A. Grantees will enter PTS data as usual through the end of the grant period of performance. The final Quarterly Performance Report (QPR) is due 45 days after the last quarter of the grant period. Grantees may submit the final QPR prior to that date if they have completed data entry for their grant sooner.

**8. What is Mathematica’s role after the grant ends for the evaluation? Will grantees need to provide data to Mathematica for the evaluation after the grant ends?**

- A. The sites that are part of the administrative data collection and Random Control Trial have MOUs with Mathematica regarding collection of school records data through the end of the 2017-2018 school year. Given that some districts will not have data available until several months after the end of the school year, data collection effort will likely continue beyond the end of their grants. The MOUs describe what data will be collected and when so districts can plan ahead. The rest of the evaluation data collection

activities, including site visits and the grantee surveys, will be completed before the grants end.

- 9. What percentage of time does the grant's project coordinator or director bill as program versus administrative?**
  - A. This can vary by grant program; you should work with your FPO if you have questions.
- 10. How would DOL recommend billing the person's time who enters student data into PTS? Should it be billed as program or administrative time?**
  - A. This can vary by grant program; you should work with your FPO if you have questions.

## Questions from the Closeout Webinar (April 26, 2017)

- 1. What does NICRA stand for?**
  - A. Negotiated Indirect Cost Rate Agreement.
- 2. Is the inventory requirement on the total value of equipment or on each individual piece of equipment over \$5,000?**
  - A. The \$5,000 limit is based on each individual piece of equipment. For example, if you have a piece of equipment like a computer system that includes cords and peripheral devices that cumulatively add up to 5,000 or greater, that should be included on the inventory list. So you cannot value each item separately to get right under that \$5,000 mark.
- 3. If the value of an item has dropped below \$5,000 from depreciation, do we need to include those items on our inventory list?**
  - A. No, if the value of an item has fallen below \$5,000 with depreciation, it does not need to be included on the inventory list.
- 4. Is there a process or formula for determining fair market value of equipment?**
  - A. DOL does not have a formal process or formula for determining the fair market value of equipment. However, documentation of your organization's method or formula for identifying the current fair market value of equipment may be requested.
- 5. In the new uniform guidance there is 10% flexibility on all cost categories. Does the 10% flexibility also apply to the personnel category?**
  - A. YCC grants were awarded before the Uniform Guidance went into effect. If you have not modified your grant terms to be under Uniform Guidance, you should follow what is in your grant agreement for budget flexibility. If you have modified your grant terms and are under Uniform Guidance, the 10% flexibility applies to all categories, including the personnel category. However, if the cumulative amount of the transfers exceeds 10% of the total budget as last approved, those funds will be disallowed.

- 6. Does a "no cost" extension mean we can't spend grant dollars during the 5th year or are unspent funds still available?**
  - A. If a grantee is approved for a Period of Performance ("no cost") extension, unspent funds will continue to be available for approved grant activities.
- 7. On slide 18 is column 3 the match and leveraged resources?**
  - A. No, there is no line item for match or leveraged resources on the grantee's detailed statement of costs. However, that line item is on the 9130 report.
- 8. What process occurs if you don't spend every dollar awarded as reported in the final/closeout 9130?**
  - A. Any unspent grant funds at the end of closeout will be returned to the treasury.
- 9. Will there be a site visit during closeout like there was during some monitoring visits?**
  - A. No, there will not be a site visit during closeout.
- 10. If we have met our match requirements, should we continue to post additional match?**
  - A. Yes, you should report all match.
- 11. What happens if we do not meet our match requirement?**
  - A. The YCC SGA required a 25% match. During closeout, match will be calculated on the amount of funds expended during the life of the grant. Grantees are expected to fulfill the 25% match amount specified during the grant period of performance. If the match requirement is not met, the grantees will be required to repay the unmet match portion to the Department of Labor.
- 12. Are we able to enroll new students during the no-cost extension period?**
  - A. New students may be enrolled until the end of the original period of performance, September 30, 2018. If you have been approved for an extension you may choose to enroll new students in the 2018-2019 school year if you plan to continue services after the grant ends; however, the new students must be enrolled by September 30, 2018.