

ADMINISTRATIVE AND FISCAL QUESTIONS
REPORTING

AFR1: Is the State required to report expenditures paid for with the Governor's 15% funds separately from expenditures paid for with 85% funds distributed to Local Boards?

Yes, they must be reported separately.

AFR2: What reporting requirements will apply to third-party cash match at the Local Board level?

The State WtW administering agency will decide on the appropriate Local Board-level reporting instructions that will enable the State to complete the Federal reporting requirements.

AFR3: If a State chooses to award more than 85% of its funds to Local Boards through the formula process, are the excess funds over the 85% [Governor's 15% funds] included for reporting purposes with the 85% funds or are they reported as 15% funds?

The Act requires States to allocate NOT LESS THAN 85% to the Local Boards by formula. Where a State passes through more than 85% BY FORMULA to the Local Boards, all distributed funds will be reported together. However, if a State distributes 85% by formula and then uses some other basis for allocation of additional funds to Local Boards (e.g., incentive for an exceptional program, incentive for a match contribution, etc.), the funds not distributed by formula must be tracked and reported separately as Governor's 15% funds.

AFR4: If a State has a Local Board(s) that would receive less than \$100,000 under the formula distribution process and the State decides to award that amount to the Local Board rather than use it for other purposes, should these funds be reported as formula 85% funds or as non-formula 15% funds?

Local Boards which would receive less than \$100,000 by formula cannot be awarded funds under the 85% formula distribution process. The State must add these amounts to the Governor's 15% funds. If the Governor then chooses to award/grant those funds back to the same Local Boards that could not receive them through the formula distribution process, said funds must be tracked and reported as Governor's 15% funds.

AFR5: What kind of data does the Department require on the WtW Cumulative Quarterly Financial Status Report?

The WtW Formula Grant Cumulative Quarterly Financial Status Report requires the following data:

- (1) Data for the grant as a whole on total match expenditures and the third-party in-kind portion of match (75% maximum); total Federal, administrative, information technology, and program expenditures; a breakout of Federal expenditures for the primary eligibles and other eligibles (30% maximum); and lines for unliquidated and unobligated funds;
- (2) Expenditures of the Governor's 15% funds, including a breakout for expenditures for the Federal special rule distribution for Local Areas= allocations which fall below the \$100,000 threshold; and administrative, information technology, and program expenditures;
- (3) Expenditures of the formula pass-through funds (85% minimum), including a breakout for administrative, information technology, and program expenditures;
- (4) Program income earned and expended;
- (5) Total number of participants served in the primary eligibles and other eligibles (30% maximum of grant award) categories, with breakouts for eligibility sub-categories; total number of participants terminated in the primary eligibles and other eligibles (30% maximum of grant award) categories; total number of participants placed in unsubsidized employment after entering WtW, employed in unsubsidized employment when entering WtW, and placed in subsidized employment after entering WtW, with breakouts for participants working greater than or equal to 30 hours per week and participants working less than 30 hours per week at placement or program entry; total number of participants retained 6 months (2 quarters) in unsubsidized employment; and earnings gained in 6 months (2 quarters) following placement in unsubsidized employment; and
- (6) Gender, age, race/ethnicity, and voluntary disability data for participants served.

The WtW Competitive Grant Cumulative Quarterly Financial and Participant Status Report requires all of the same data elements required on the WtW Formula Grant Cumulative Quarterly Financial and Participant Status Report, with the exception of data elements about expenditures for match, Governor's 15% funds, and formula pass-through funds (85% minimum).

WtW reporting formats and instructions, which became effective in the quarter ending June 30, 2001, are available on the WtW web site at <http://wtw.doleta.gov/linkpages/tegltein.asp>.

AFR6: How is retention defined for WtW reporting purposes?

Retention is defined as when an eligible individual is placed in unsubsidized employment and remains in the workforce for six months with earnings in the two consecutive quarters following the quarter in which the participant was either placed in unsubsidized employment or entered the WtW program already employed in unsubsidized employment. Participants can hold different jobs during these three

quarters as long as they can demonstrate a six-month attachment to the workforce, with earnings from unsubsidized work in the base/placement quarter and each of the two subsequent retention quarters.

AFR7: How should the costs for computer hardware and software be reported?

Generally, computer hardware and software costs should be reported either as administrative costs or program costs depending upon their function under the new administrative cost definition at 20 CFR 645.235. Administrative hardware or software costs might include information technology systems for personnel, procurement, purchasing, payroll, etc. Programmatic hardware or software costs might include information technology systems for job readiness, case management, training activities, etc.

However, under 20 CFR 645.235(a)(3), the costs of computer hardware and software needed for tracking and monitoring of WtW program, participant, or performance requirements are reported separately from administrative and program costs. These tracking and monitoring costs should be reported on the “Federal Technology Computerization Expenditures” line, not on the program or administrative lines, and are excluded from the 15% administrative cost limit calculation.

In all cases, the costs of computer technology must be allocated to the primary eligibles and other eligibles (30% maximum) cost categories.

AFR8: How do multi-site competitive grantees report information on subgrantees?

Each grantee is required to submit one single report per grant award. For multi-site grants, this report should be a roll-up of their individual site reports. Although grantees are not required to submit subgrantee reports under the terms of the grant, Grant Officer Technical Representatives may request that grantees submit paper copies of site-specific reports as well.

AFR9: Can a WtW participant be served with both WtW formula and competitive funds? Can the person be counted in the WtW formula management information system (MIS) and in the WtW competitive MIS?

Yes, a participant may be enrolled in multiple WtW formula and/or competitive grants, as well as in other programs, at the same time. The purpose for co-enrollment should be to avoid unnecessary duplication of services in a particular locale. If the individual is eligible for, enrolled in, and being served by both programs, then they should be counted in both MIS systems, as appropriate. For instance, if two WtW grantees each contributed funds/services toward a participant's placement in unsubsidized employment, both grantees should report that participant's placement on their reports.

AFR10: If a competitive grantee hires a WtW participant as a program employee, and the salary is paid from the grantee's competitive grant, is this placement counted as subsidized or unsubsidized employment?

The situation described above is a direct hire of a new employee, and is therefore considered an unsubsidized placement, presuming the WtW participant is treated the same as other employees by the employer.

AFR11: Please provide a definition for “termination.”

The WtW legislation and regulations do not provide a definition for “termination,” because the concept of termination is not central to the WtW program design or intent. The goal of the WtW program is to provide an extensive array of long-term services to individuals to enable them to obtain and retain employment and to achieve self-sufficiency, and WtW grantees are encouraged to keep participants in their programs for as long as is feasible, necessary, and helpful for participants.

However, the WtW reporting instructions (see <http://wtw.doleta.gov/linkpages/tegltein.asp>) do provide a definition for what constitutes “participant served” status, and we use this definition to understand what constitutes a termination. A WtW participant is considered an active participant being served so long as (s)he is receiving one or more of the WtW allowable services (job readiness, vocational educational training or job training, community service, work experience, job creation through public or private sector employment wage subsidies, on-the-job training, job placement, post-employment services, job retention or support services, and individual development accounts). Other services which also constitute participant served status are in-depth assessment (e.g., assessment beyond that which is required for intake and eligibility determination purposes), development of an individualized service strategy, and case management services. Intake, initial assessment, and eligibility determination are not services which constitute participant served status.

Participants may cease to receive services which constitute participant served status for a number of reasons. An individual may voluntarily leave the program and not remain in touch with the grantee, despite the grantee's repeated efforts to contact and retain him/her in the program, or an individual may successfully complete his/her program of services and graduate from the WtW program. An individual may be asked to leave the WtW program due to disciplinary issues or other severe problems. In any of these scenarios, if the participant is no longer actively engaged in one or more of the allowable WtW activities, or is no longer receiving in-depth assessment, development of an individualized service strategy, or case management services, the grantee is required to have a written termination policy in place and should terminate the participant according to that policy. For example, grantees could establish a termination policy which provides that if an individual has not returned for services or responded to follow-up attempts for ninety days, then the individual will no longer be reported as a participant served, and will be counted on the appropriate quarterly report as a termination. Ninety days is merely a suggested time frame; grantees may establish shorter or longer time frames before reporting an individual as a terminnee. Keep in mind, however, that shorter time frames may be disadvantageous, as grantees must re-determine eligibility for terminated individuals who later return for services. Longer time frames may also be disadvantageous, as large numbers of inactive or non-

responsive individuals overburden caseworkers= caseloads, and unreasonably lengthy inactive status periods before reporting individuals as terminees may also raise concerns during reviews or audits.