



BOARD OF SUPERVISORS AGENDA ITEM REPORT AWARDS / CONTRACTS / GRANTS

☐ Award ☐ Contract ☒ Grant

Requested Board Meeting Date: 11/02/2021

** = Mandatory, information must be provided*

or Procurement Director Award: ☐

***Contractor/Vendor Name/Grantor (DBA):**

U.S. Department of Labor, Employment and Training Administration

***Project Title/Description:**

Comprehensive and Accessible Reemployment Through Equitable Employment Recovery (CAREER)

***Purpose:**

Help fund the requirements research, implementation, and operation of a new all-encompassing client management system (CMS) for the Community and Workforce Development Department. This CMS will link all services and resources and allow remote access for clients who cannot participate in-person.

***Procurement Method:**

Competitive selection grant direct from grantor.

***Program Goals/Predicted Outcomes:**

The new CMS will provide remote access and a one-stop system to all Pima County residents who need career and technical training, eviction prevention, housing, and community development services.

***Public Benefit:**

The new CMS will allow the Community and Workforce Development Department to reach more participants, and especially to reach participants who cannot or are hesitant to engage with departmental resources in-person for any reason. The marketing and outreach plan for advertising this new system targets modes and methods to reach specific underserved populations to add an equity component to the CMS implementation program.

***Metrics Available to Measure Performance:**

Quantitative metrics required by the Department of Labor are the same as Workforce Innovation Opportunity Act goals with Community (WIOA) and Workforce Development is already meeting through operating the WIOA grant. Additional qualitative goals will be whether the new CMS once released connects all existing services, data portals and platforms within the full range of Community and Workforce Development programs.

***Retroactive:**

Yes, this is retroactive to September 24, 2021. If not approved, more general fund money will be required to help pay for the new CMS. Additionally, this would prevent or delay the Department from purchasing add on system components to fill inevitable functionality gaps which could hamper or deter Pima County residents from taking full advantage of this new system.

G.M.I. approved 10/20/21 JLS

THE APPLICABLE SECTION(S) BELOW MUST BE COMPLETED

Click or tap the boxes to enter text. If not applicable, indicate "N/A". Make sure to complete mandatory (*) fields

Contract / Award Information

Document Type: _____ Department Code: _____ Contract Number (i.e., 15-123): _____
Commencement Date: _____ Termination Date: _____ Prior Contract Number (Synergen/CMS): N/A
☐ Expense Amount \$ _____ * ☒ Revenue Amount: \$ _____

*Funding Source(s) required: _____

Funding from General Fund? ☐ Yes ☐ No If Yes \$ _____ % _____

Contract is fully or partially funded with Federal Funds? ☒ Yes ☐ No

If Yes, is the Contract to a vendor or subrecipient? No

Were insurance or indemnity clauses modified? ☐ Yes ☒ No

If Yes, attach Risk's approval.

Vendor is using a Social Security Number? ☐ Yes ☒ No

If Yes, attach the required form per Administrative Procedure 22-10.

Amendment / Revised Award Information

Document Type: _____ Department Code: _____ Contract Number (i.e., 15-123): _____
Amendment No.: _____ AMS Version No.: _____
Commencement Date: _____ New Termination Date: _____
Prior Contract No. (Synergen/CMS): _____

☐ Expense ☐ Revenue ☐ Increase ☐ Decrease

Amount This Amendment: \$ _____

Is there revenue included? ☐ Yes ☐ No If Yes \$ _____

*Funding Source(s) required: _____

Funding from General Fund? ☐ Yes ☐ No If Yes \$ _____ % _____

Grant/Amendment Information (for grants acceptance and awards)

☒ Award ☐ Amendment

Document Type: GTAW Department Code: 3377 Grant Number (i.e., 15-123): 22*037
Commencement Date: 9/24/2021 Termination Date: 9/23/2023 Amendment Number: _____
☐ Match Amount: \$ _____ ☒ Revenue Amount: \$ 363,535.00

*All Funding Source(s) required: _____

*Match funding from General Fund? ☐ Yes ☒ No If Yes \$ _____ % _____

*Match funding from other sources? ☐ Yes ☒ No If Yes \$ _____ % _____

*Funding Source: _____

*If Federal funds are received, is funding coming directly from the Federal government or passed through other organization(s)?
Direct from the US Department of Labor.

Contact: Sean Lopez

Department: Community and Workforce Development

Telephone: 724-6726

Department Director Signature: [Signature] 10.14.21

Date: _____

Deputy County Administrator Signature: _____

Date: 18 Oct 2021

County Administrator Signature: [Signature]

Date: 10/19/21

**U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING
ADMINISTRATION (DOL/ETA)**

**NOTICE OF
AWARD (NOA)**

Under the authority of the **WIOA Sec. 170, National Dislocated Worker Grants**, this grant or agreement is entered into between the above named **Grantor Agency** and the following named **Awardee**, for a project entitled - **CAREER DISLOCATED WORKER GRANTS**.

Name & Address of Awardee:

Pima County
2797 E. Ajo Way
Tucson, ARIZONA 85713-6223

Federal Award Id. No. (FAIN): DW-37005-21-60-A-4
CFDA #: 17.277- WIOA National Dislocated Worker
Grants / WIA National Emergency Grants (NEGs)
Amount:\$365,535.00
EIN: 866000543
DUNS #: 033738662

Accounting Code: 1630-2021-0501742121BD202101740003215DW093A0000AOWI00AOWI00-A90200-410023-ETA-DEFAULT TASK-

Payment Management System DOC#: DW370055R0

The Period of Performance shall be from **September 24, 2021 thru September 23, 2023**.
Total Government's Financial Obligation is **\$365,535.00** (unless other wise amended).

Payments will be made under the Payments Management System, and can be automatically drawn down by the awardee on an as needed basis covering a forty-eight (48) hour period.

The Recipient's application of August 18, 2021, requesting CAREER National Dislocated Worker Grant funding to address workforce impacts resulting from the COVID-19 pandemic, is conditionally approved for \$365,535. Please see attached Special Conditions of Award.

In performing its responsibilities under this grant agreement, the awardee hereby certifies and assures that it will fully comply with all applicable Statute(s), and the following regulations and cost principles, including any subsequent amendments:

Uniform Administrative Requirements, Cost Principles, and Audit Requirements:

2 CFR Part 200; Uniform Administrative Requirements, Cost Principles, and Audit Requirements; Final Rule
2 CFR Part 2900; DOL Exceptions to 2 CFR Part 200;

Other Requirements (Included within this NOA):

Condition(s) of Award (if applicable)
Federal Award Terms, including attachments

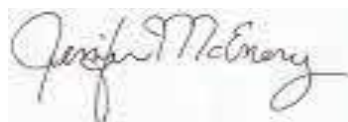
Contact Information

The Federal Project Officer (FPO) assigned to this grant is Jeffrey Patton. Jeffrey Patton will serve as your first line point of contact and can be contacted via e-mail - patton.jeffrey.d@dol.gov. If your FPO is not available, please call your Regional Office at 415-625-7900 for assistance.

The awardee's signature below certifies full compliance with all terms and conditions as well as all applicable Statutes(s), grant regulations, guidance, and certifications.

Signature of Approving Official - **AWARDEE**

Signature of Approving Official - **DOL / ETA**



See SF-424 for Signature
No Additional Signature Required

Jenifer McEnery, September 27, 2021
Grant Officer

**COMPREHENSIVE AND ACCESSIBLE REEMPLOYMENT THROUGH
EQUITABLE EMPLOYMENT RECOVERY (CAREER)
NATIONAL DISLOCATED WORKER GRANT
SPECIAL CONDITIONS OF AWARD**

Grant Number: DW-37005-21-60-A-4

Recipient: Pima County

Project Title: CAREER Dislocated Worker Grants

The application to request National Dislocated Worker Grant (DWG) funds received on August 18, 2021, is conditionally approved for \$365,535. As a condition of this grant award, you must address the issues identified in this document by submitting a subsequent modification request via email to your assigned Federal Project Operator (FPO) within 30 business days of the receipt of this grant award package. The modification request must incorporate all information requested below and **receive FPO concurrence that all conditions have been resolved.**

Please note that a submittal of revised documents does not in and of itself constitute approval by the Employment and Training Administration, as final approval must be given by the Grant Officer. Once approved, the revised documents will comprise the official modification to this grant agreement and the special conditions of award will be resolved.

In addition to the conditions listed below, you must work closely with your assigned FPO to ensure compliance with award terms and the applicable Training and Employment Guidance Letters, providing documentation as requested to demonstrate eligibility requirements, allowable project activities, and administrative cost limitations, and to ensure supportive services are consistent with WIOA. Grantees planning to purchase equipment (including information technology systems) must receive prior approval from the Grant Officer before making purchases, and may not purchase any equipment in the last year of the award.

Questions pertaining to the submission of the modification responding to these Conditions of Award must be directed to your FPO as soon as possible. Contact information for your assigned FPO is in the Federal Award Terms (p 5).

CONDITIONS OF AWARD

- 1) Revise the SOW to:
 - a. Incorporate a preliminary Implementation Plan for the proposed project that includes:
 - i. Project Activities including allowable career, training and supportive services.

- ii. Targeted populations of Dislocated Workers Served by this Activity (or how Dislocated Workers will benefit from this activity if grant is focused on technology solutions only).
- iii. Timeframes for Milestones and Project Completion.
- iv. The preliminary Implementation Plan must be reviewed with your assigned FPO and receive concurrence that the proposed project activities and preliminary implementation plan are in compliance with WIOA and TEGLs 12-19 and 25-20.

2) Revise the SF-424 to:

- a. Reflect the approved period of performance.
- b. Include the Authorized Representative's handwritten signature.

**Comprehensive and Accessible Reemployment through
Equitable Employment Recovery (CAREER)
National Dislocated Worker Grant
Federal Award Terms FY 2021**

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1. Order of Precedence

In the event of any inconsistency between the terms and conditions of this Notice of Award (NOA) and other requirements, the following order of precedence shall apply:

- I. Workforce Innovation and Opportunity Act
- II. Other applicable Federal statutes.
- III. Consolidated Appropriations Act, 2021 (Public Law 116-260) dated December 27, 2020.
- IV. Implementing Regulations.
- V. Executive Orders and Presidential Memoranda.
- VI. The Office of Management and Budget (OMB) Guidance, including the Uniform Guidance at 2 CFR 200 and 2900.
- VII. Training and Employment Guidance Letter WIOA No. 12-19, Operational Guidance for National Dislocated Worker Grants.
- VIII. Terms and conditions of this award.

2. Notice of Award

The funds that are provided under this NOA must be expended according to all applicable Federal statutes, regulations and policies, including those of the Workforce Innovation and Opportunity Act (WIOA), the applicable approved WIOA State Plan (including approved modifications and amendments to the plan), and any waiver plan approved under WIOA Section 189(i)(3) or Workforce Flexibility (Workflex) plan approved under WIOA Section 190, the negotiated performance levels and policies established pursuant to the Secretary's authority under WIOA Section 116, and the applicable provisions in the appropriations act(s).

The funds shall be obligated and allocated via a NOA grant modification. These obligations and expenditures may not exceed the amount awarded by the NOA modification unless otherwise modified by the ETA.

3. Funding Opportunity Announcement

Training and Employment Guidance Letter (TEGL) WIOA No. 12-19 transmits the funding opportunity associated with this award. TEGL No. 12-19 and all applicable amendments are hereby incorporated into the Notice of Award. Award recipients are bound by the authorizations, restrictions, and requirements contained in the FOA. Therefore, the expenditure of grant funds by the award recipient certifies that your organization has read and will comply with all the parts that are contained in the NOA.

4. Administrative Law Judge Removal of Award

By drawing down funds, your organization as the award recipient agrees to the provisions of 20 CFR 683.820(b)(6), which states:

“Any organization selected and/or funded under WIOA Title I, Subtitle D, is subject to having its award removed if an Administrative Law Judge (ALJ) decision so orders. As part of this

process, the Grant Officer will provide instructions on transition and closeout to both the newly selected grantee and to the grantee whose positions is affected or which is being removed.”

5. Federal Project Officer

The DOL/ETA Federal Project Officer (FPO) for this award is:

Name: Jeffrey Patton
Telephone: 415-625-7945
E-mail: Patton.Jeffrey.D@dol.gov

The FPO is not authorized to change any of the terms or conditions of the award, or approve prior approval requests. Any changes to the terms or conditions or prior approvals must be approved by the Grant Officer through the use of a formally executed award modification process.

6. Indirect Cost Rate and Cost Allocation Plan

Indirect (facilities & administrative (F&A)) costs means those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Direct costs, by contrast, can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Identification with the Federal award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect (F&A) costs of Federal awards.

If the DOL serves as the Federal Cognizant Agency (FCA) for the grant award recipient, then the grantee must work with DOL’s Cost & Price Determination Division (CPDD), which has delegated authority to negotiate and issue a Negotiated Indirect Cost Rate Agreement (NICRA) or Cost Allocation Plan (CAP) on behalf of the Federal Government. More information about the DOL’s CPDD is available at <https://www.dol.gov/agencies/oasam/centers-offices/office-of-the-senior-procurement-executive/cost-price-determination-division>. This website has guidelines to develop indirect cost rates, links to the applicable cost principles, and contact information. The CPDD also has Frequently Asked Questions to provide general information about the indirect cost rate approval process and due dates for provisional and final indirect cost rate proposals at <https://www.dol.gov/agencies/oasam/centers-offices/office-of-the-senior-procurement-executive/cost-price-determination-division/faq>.

If a new NICRA is issued during the grant’s period of performance, it must be provided to DOL within 30 days of issuance. Funds may be re-budgeted as necessary between direct cost categories as long as it is consistent with the Budget Flexibility term within this agreement, grant requirements, and DOL regulations on prior approval. However, the total amount of the grant award will not be increased.

___ A. A federally approved NICRA or federally approved CAP covering a portion of the grant period of performance is attached.

Regarding only the NICRA:

(1) Indirect Rate approved: See Attachment E

(2) Type of Indirect Cost Rate: See Attachment E

(3) Allocation Distribution Base: See Attachment E

(4) Current beginning and ending period applicable to rate: See Attachment E

*Estimated Indirect Costs are shown on the SF-424A budget form.

___ B. (1) ___ The provided NICRA or CAP approved by the FCA does not cover a portion of the period of performance, or

(2) ___ Indirect costs are being claimed on the SF-424A, however an indirect cost rate proposal or CAP has not yet been submitted for approval to the FCA.

URGENT NOTICE: Estimated indirect costs have been specified on the SF-424A, Section B, Object Class Category “j”, however only *the de minimis rate of 10% of Modified Total Direct Costs (MTDC)* will be released to support the indirect costs in the absence of a NICRA or CAP approved by the FCA. The remaining funds which have been awarded for Indirect Costs are restricted and may not be used for any purpose until the recipient provides a signed copy of the NICRA or CAP and receive documentation stating that the restriction is lifted by the Grant Officer. Upon receipt of the NICRA or CAP, the Grant Officer will issue a grant modification to the award to remove the restriction on those funds.

As the grant award recipient, the grantee must submit an indirect cost rate proposal or CAP. If the FCA for indirect costs is DOL, these documents should be submitted to the DOL’s Cost & Price Determination Division (CPDD) (see <https://www.dol.gov/agencies/oasam/centers-offices/office-of-the-senior-procurement-executive/cost-price-determination-division>). Otherwise, they should be submitted to the grant award recipient’s FCA. Alternatively, the grantee may request the de minimis rate if eligible (see section D. below). In addition, the recipient must notify the FPO that the documents have been submitted to the appropriate FCA. **If the grant recipient does not submit a NICRA proposal within 90 days of award, they may be limited to the de minimis rate of 10% of Modified Total Direct Costs (MTDC). See section D below for more details and definitions.**

___ C. The grant award recipient elected to exclude indirect costs from the proposed budget. Please be aware that incurred indirect costs (such as top management salaries, financial oversight, human resources, payroll, personnel, auditing costs, accounting and legal, etc. used for the general oversight and administration of the organization) must not be classified as direct costs; these types of costs are indirect costs. Only direct costs, as defined by the applicable cost principles, will

be charged. According to 2 CFR 200.412, if indirect costs are misclassified as direct costs, such costs may become disallowed through an audit.

- X D. The grant award recipient does not have a current negotiated (including provisional) rate and may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. A governmental department or agency unit that receives more than \$35 million in direct Federal funding must submit its indirect cost rate proposal to its cognizant agency for indirect costs and cannot request a de minimis rate. This methodology must be used consistently for all Federal grant awards until such time as the grant award recipient chooses to negotiate for an indirect cost rate, which the grantee may apply to do at any time. See 2 CFR 200.414(f) for more information on use of the de minimis rate. Please be aware that incurred indirect type costs (such as top management salaries, financial oversight, human resources, payroll, personnel, auditing costs, accounting and legal, etc. used for the general oversight and administration of the organization) must not be classified as direct costs; these types of costs are recovered as part of charging the de minimis rate.

All grant recipients with an approved NICRA or de minimis rate must report indirect costs on their **FINAL** ETA-9130 Form. If a grant recipient has a NICRA and a CAP, only the indirect costs tied to the NICRA are reported on the ETA-9130 Form. The grantee can refer to Training and Employment Guidance Letter (TEGL) 20-19 and https://www.doleta.gov/grants/pdf/ETA-9130_Financial_Reporting_Resources.pdf for additional guidance.

7. Approved Statement of Work

This project's narrative is the approved SOW. It has been included as Attachment D. If there is any inconsistency between the project narrative and the program statute, appropriation, regulations, Executive Orders, Uniform Guidance, OMB Circulars, and DOL/ETA directives, the order of precedence (as described in Section 1. above) will prevail.

8. Approved Budget

The grant award recipient's budget documents are attached in this NOA. The documents are: 1) the SF-424, included as Attachment A; 2) the SF-424 A, included as Attachment B; and 3) the Budget Narrative, included as Attachment C. As the grant award recipient, the grantee must confirm that all costs are allowable before creating any expenses.

Pursuant to 2 CFR 2900.1, the approval of the budget as awarded does not constitute prior approval of those items specified in 2 CFR part 200 or as a part of the grant award as requiring prior approval. The Grant Officer is the only official with the authority to provide such approval. Any changes to the budget that impact the Statement of Work The Grant Officer is the only official with the authority to provide such approval. Any changes to the budget that impact the Statement of Work (SOW) and agreed upon outcomes or deliverables will require a request for modification and prior approval from the Grant Officer.

If the period of performance will include multiple budget periods, subsequent budget periods are subject to the availability of funds, program authority, satisfactory performance, and compliance terms and conditions of the Federal award.

9. Return of Funds

DOL/ETA does not accept paper checks for any type of returned funds. For active grants, all returns of funds are to be submitted electronically through the PMS operated by the U.S. Department of Health and Human Services (HHS) via the same method as a drawdown. For grants that have been cancelled or are expired (typically older than five years), incoming payments, including returns and recoveries to DOL, must be made via the Pay.gov website (<https://www.pay.gov/public/form/start/177233981>).

If there are questions regarding the return of funds or your organization no longer has access to PMS, contact the DOL, ETA, Office of Financial Administration via email at: ETA-ARteam@dol.gov for further assistance.

10. Evaluation, Data, and Implementation

As the grant award recipient, the grantee must cooperate during the implementation of a third-party evaluation. This means providing DOL or its authorized contractor with the appropriate data and access to program operating personnel and participants in a timely manner.

11. Cost Limitation Restrictions

a. Administrative Costs

Administrative costs under this award follow the definition in the Workforce Innovation and Opportunity Act at 20 CFR 683.215.

There is a 15 percent limitation on a DWG project's total administrative costs when the direct recipient is not also serving as the project operator. Unless a written justification is approved by the Grant Officer, administrative costs may not exceed this 15 percent limit. Direct recipients of DWG funds are limited to spending no more than 5 percent of the total award on administrative costs, and the project operator(s) may retain up to 10 percent of the award amount (for a total of 15 percent of the award). Compliance with the administrative costs limit is monitored throughout the grant period. Any amounts exceeding this limitation at closeout will be disallowed and subject to debt collection.

For DWG recipients who are also serving as the project operator, the administrative costs limit is 10 percent of the total award.

b. Single Audit Submission Deadline Extension Related to COVID-19

In [OMB Memorandum M-20-17](#), OMB offered an extension of Single Audit submission deadlines for fiscal years ending June 30, 2020 to allow recipients and subrecipients a

responsible transition to normal operations. This flexibility was extended through December 31, 2020 by [OMB Memorandum 20-26](#).

In [OMB Memorandum M-21-20](#), Appendix 3, Item IX, OMB has offered an additional extension of Single Audit submission deadlines for fiscal years ending June 30, 2021. Award recipients and subrecipients that have not yet filed their single audits with the Federal Audit Clearinghouse as of March 19, 2021 that have fiscal year-ends through June 30, 2021 may delay the completion and submission of the Single Audit reporting package, as required under 2 CFR § 200.501 (Audit Requirements), to six (6) months beyond the normal due date. This extension does not require individual recipients and subrecipients to seek approval for the extension by the cognizant or oversight agency for audit; however, recipients and subrecipients should maintain documentation of the reason for the delayed filing.

c. Budget Flexibility

Federal recipients are not permitted to make transfers that would cause any funds to be used for purposes other than those consistent with this Federal program. Any budget changes that impact the SOW and agreed upon outcomes or deliverables require a request for modification and approval from the Grant Officer.

As directed in 2 CFR 200.308(e), for programs where the Federal share is over the Simplified Acquisition Threshold (SAT) (currently \$250,000), the transfer of funds among direct cost categories or programs, functions, and activities is restricted such that if the cumulative amount of such transfers exceeds or is expected to exceed 10% of the total budget as last approved by the Federal awarding agency, the recipient must receive prior approval from the Grant Officer. Any changes within a specific cost category on the SF424(a) do not require a grant modification unless the change results in a cumulative transfer among direct cost categories exceeding 10% of total budget. It is recommended that the assigned FPO review any within-line changes to the grant award recipient's budget prior to implementation to ensure they do not require a modification.

For programs where the Federal share of the project is below the SAT of \$250,000, recipients are not required to obtain the Grant Officer's approval when transferring funds among direct cost categories.

d. Consultants

For the purposes of this grant award, the ETA's Grant Officer has determined that fees paid to a consultant who provides services under a program shall be limited to \$750.00 a day (representing an eight-hour workday). Such costs must be reasonable, allocable and allowable to the program. Any fees paid in excess of this amount cannot be paid without prior approval from the Grant Officer.

2 CFR 2900.8 before it can be recognized and reported as match on the ETA-9130 report.

e. Travel

This award waives the prior approval requirement for domestic travel as contained in 2 CFR 200.475. For domestic travel to be an allowable cost, it must be necessary, reasonable, allocable and conform to the non-Federal entities written policies and procedures. All travel must also comply with Fly America Act (49 USC 40118), which states in part that any air transportation, regardless of price, must be performed by, or under a code-sharing arrangement with, a U.S. Flag air carrier if service provided by such carrier is available.

f. Travel – Foreign

Foreign travel is not allowable except with prior written approval from the Grant Officer through the process described in 2 CFR 200.407 and 2 CFR 2900.16. All travel, both domestic and Grant Officer approved foreign travel, must comply with the Fly America Act (49 USC 40118), which states in part that any air transportation, regardless of price, must be performed by, or under a code-sharing arrangement with, a U.S. Flag air carrier if service provided by such carrier is available.

g. Travel – Mileage Reimbursement Rates

Pursuant to 2 CFR 200.475(a), all award recipients must have policies and procedures in place related to travel costs; however, for reimbursement on a mileage basis, this Federal grant award cannot be charged more than the maximum allowable mileage reimbursement rates for Federal employees. Mileage rates must be checked annually at www.gsa.gov/mileage to ensure compliance.

h. WIOA Infrastructure

WIOA, Section 121(b)(1)(B) and 20 CFR 678.400 require the following programs to be One-Stop partners:

- A. WIOA, Title I programs: Adult, Dislocated Worker, and Youth formula programs, Job Corps, YouthBuild, Native American programs, National Dislocated Worker Grants (DWG), and NFPJ;
- B. Wagner-Peyser Act Employment Service (ES) program authorized under the Wagner-Peyser Act (29 U.S.C. 49 et seq.), as amended by WIOA, Title III;
- C. SCSEP authorized under Title V of the Older Americans Act of 1965;
- D. Trade Adjustment Assistance (TAA) activities authorized under Chapter 2 of Title II of the Trade Act of 1974;
- E. Unemployment Compensation (UC) programs;
- F. Jobs for Veterans State Grants (JVSG) programs authorized under Chapter 41 of Title 38, U.S.C.; and
- G. Reentry Employment Opportunities (REO) programs (formerly known as the Reintegration of Ex-Offenders Program (RExO) awarded prior to January 1, 2019 which were authorized under Section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532).

With the exception of Native American programs established under WIOA, Section 166 all One-Stop partner programs including all programs that are funded under Title I of

WIOA are required to contribute to the infrastructure costs and certain additional costs of the One-Stop delivery system in proportion to their use and relative benefits received, per 20 CFR 678.700 and 678.760. While Native American programs are not required to contribute to infrastructure costs per WIOA Section 121(h)(2)(D)(iv), they are strongly encouraged to contribute as stated in TEGL No. 17-16. The sharing and allocation of infrastructure costs between One-Stop partners is governed by WIOA Section 121(h), WIOA's implementing regulations, and the Federal Cost Principles contained in the Uniform Guidance at 2 CFR part 200 and DOL's exceptions at 2 CFR part 2900. The Federal Cost Principles state that a partner's contribution is an allowable, reasonable, necessary, and allocable cost to the program and is consistent with other legal requirements.

If not deemed a required one-stop partner, it is strongly recommended that the grant recipient partner with the local WIOA one-stop delivery system in its service area(s). The one-stop system can assist with referrals, labor market information, and many other services that will directly benefit the management and performance of your grant. The one-stop system also provides access to a wide range of publicly- and privately-funded education, employment, training, and supportive services while also providing high-quality customer service to job seekers, workers, and businesses.

12. Administrative Requirements

a. For-Profit and Foreign Entities

Recipients of Federal Awards from DOL are included in the definition of Non-Federal Entity (NFE) for purposes of compliance with the Uniform Guidance found at 2 CFR 200 and 2900. OMB approved an exception for DOL at 2 CFR 2900.2, which defines Non-Federal Entity as a state, local government, Indian tribe, institution of higher education (IHE), for-profit entity, foreign public entity, foreign organization or nonprofit organization that carries out a Federal award as a recipient or subrecipient.

b. SF-424, Application for Federal Assistance, and SF-424B, Assurances and Certifications

The signed SF-424, Application for Federal Assistance, has been included as an attachment to this grant award. The individual that signed the SF-424 on behalf of the applicant is considered the Authorized Representative of the applicant. As stated in block 21 of the SF-424 form, the signature of the Authorized Representative on the SF-424 certifies that the grant award recipient is in compliance with the Assurances and Certifications form SF-424B (available at <http://apply07.grants.gov/apply/forms/sample/SF424B-V1.1.pdf>). The grant award recipient does not need to submit the SF-424B form separately.

c. Audits

Organization-wide or program-specific audits must be performed in accordance with Subpart F, the Audit Requirements of the Uniform Guidance. DOL awards recipients that expend \$750,000 or more in a year from any Federal awards must have an audit conducted for that year in accordance with the requirements contained in 2 CFR 200.501.

OMB's approved exception at 2 CFR 2900.2 expands the definition of 'non-Federal entity' to include for-profit entities and foreign entities. As such, for-profit and foreign entities that are recipients or subrecipients of a DOL award must adhere to the Uniform Guidance at 2 CFR 200, including Subpart F. Those audits must be submitted directly to USDOL-OGM, Attention: Audit Resolution Team.

d. Revisions to the Uniform Guidance

The Office of Management and Budget issued revisions to 2 CFR parts 25, 170, 183, and 200 (the Uniform Guidance) on August 13, 2020. These revisions became effective November 12, 2020, except for the amendments to §§ 200.216 and 200.340, which were immediately effective on August 13, 2020. The grant award recipient must operate in compliance with these revised regulations. Please note that the section numbering in the Uniform Guidance has changed in some instances, and this Terms & Conditions document has been updated accordingly.

e. Changes in Micro-purchase and Simplified Acquisition Thresholds

OMB's memorandum M-18-18, issued on June 20, 2018, increased the threshold for micro-purchases under Federal financial assistance awards from \$3,500 to \$10,000 and the threshold for simplified acquisitions under Federal financial assistance awards from \$100,000 to \$250,000. These two threshold increases were effective for all of ETA's grant recipients as of October 1, 2018. All ETA grant recipients should carefully review the above-referenced memorandum and make any necessary updates to their financial and administrative policies, procedures, and systems as a result of these threshold increases.

f. Closeout/Final Year Requirements

At the end of the grant period, the award recipient will be required to close the grant with the ETA. The grant recipient will be notified approximately 15 days prior to the end of the period of performance that the closeout process will begin when the period of performance ends. See <https://www.dol.gov/agencies/eta/grants/management/closeout> for further information on the closeout process. The recipient's responsibilities at closeout may be found at 2 CFR 200.344. During the closeout process, the grant recipient must be able to provide documentation for all direct and indirect costs that are incurred. For instance, if an organization is claiming indirect costs, the required documentation is a NICRA or CAP issued by the grantee's FCA. For those approved to utilize a de minimis rate for indirect costs, the grant agreement is sufficient documentation. Not having documentation for direct or indirect costs will result in costs being disallowed and subject to debt collection.

The only liquidation that can occur during closeout is the liquidation of accrued expenditures (NOT obligations) for goods and/or services received during the grant period (2 CFR 2900.15).

g. Open Licensing

As required at 2 CFR 2900.13, any intellectual property developed under a discretionary Federal award process must be licensed under an open license, which allows subsequent users to copy, distribute, transmit and adapt the copyrighted work and attribute the work in the manner specified by the recipient.

h. Equipment

The grant award recipient(s) must receive **prior approval** from the Grant Officer to purchase any equipment as defined in the Uniform Guidance at 2 CFR 200.1. Prior approval is required only when the acquisition cost is \$5,000 or more regardless of the non-Federal entity's capitalization threshold. Equipment purchases must be made in accordance with 2 CFR 200.313 or 2 CFR 200.439.

Being awarded this grant **does not** automatically mean that the equipment specified in the approved budget or SOW is approved by the Grant Officer. If not specified above, the recipient must submit a detailed list describing the purchase to the FPO for review within 90 days of the NOA date. The recipients are strongly encouraged to submit requests for equipment purchase as early as possible in the grant's period of performance with as many planned pieces of equipment as possible.

Recipients may not purchase equipment during the last year of the period of performance or the last year of full program service delivery (not follow up activities), whichever comes first. If any approved acquisition has not occurred prior to the last funded year of performance, approval for that item is rescinded.

i. Federal Funding Accountability and Transparency Act (FFATA)

1. Reporting of first-tier subawards.

- I. *Applicability.* Unless the grant award recipient is exempt as provided in paragraph [4.] of this award term, the grantee must report each action that equals or exceeds \$30,000 in Federal funds for a subaward to a non-Federal entity or Federal agency (see definitions in paragraph [5.] of this award term).
- II. *Where and when to report.*
 - I. The Federal entity or Federal agency must report each obligating action described in paragraph [1.i.] of this award term to <https://www.fsrs.gov>.
 - II. For subaward information, the recipient must report no later than the end of the month following the month in which the obligation was made. (For example, if the obligation was made on November 7, 2010, the obligation must be reported by no later than December 31, 2010.)
- III. *What to report.* The grant award recipient must report the information about each obligating action that the submission instructions posted at <https://www.fsrs.gov> specify.

2. Reporting total compensation of recipient executives for non-Federal entities.

- I. *Applicability and what to report.* The grant award recipient must report total compensation for each of their five most highly compensated executives for the preceding completed fiscal year, if—

- I. the total Federal funding authorized to date under this Federal award is equals or exceeds \$30,000 as defined in 2 CFR 170.320;
 - II. in the preceding fiscal year, the grantee received—
 - (A) 80% or more of the annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and
 - (B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and
 - III. The public does not have access to information on the compensation of the executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or Section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the U.S. Security and Exchange Commission (SEC) total compensation filings at <https://www.sec.gov/answers/execomp.htm>.)
- II. *Where and when to report.* The grant award recipient must report executive total compensation described in paragraph [2.a.] of this award term:
- a. As part of your registration profile at <http://www.sam.gov>.
 - b. By the end of the month following the month in which this award is made, and annually thereafter.
3. Reporting of Total Compensation of Subrecipient Executives.
- I. *Applicability and what to report.* Unless the grantee is exempt as provided in paragraph [4.] of this award term, for each first-tier non-Federal entity subrecipient under this award, the grant award recipient shall report the names and total compensation of each of the subrecipient's five most highly compensated executives for the subrecipient's preceding completed fiscal year, if—
 - I. in the subrecipient's preceding fiscal year, the subrecipient received—
 - (A) 80% or more of its annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and
 - (B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts), and Federal financial assistance subject to the Transparency Act (and subawards); and
 - II. The public does not have access to information on the compensation of the executives through periodic reports filed under Section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or Section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the SEC total compensation filings at <https://www.sec.gov/answers/execomp.htm>.)

- II. *Where and when to report.* The grant award recipient must report subrecipient executive total compensation described in paragraph [3.a] of this award term:
 - I. To the recipient.
 - II. By the end of the month following the month during which the grantee make the subaward. For example, if a subaward is obligated on any date during the month of October of a given year (i.e., between October 1 and 31), the grantee must report any required compensation information of the subrecipient by November 30 of that year.
4. Exemptions.

If, in the previous tax year, the grant award recipient had gross income, from all sources, under \$300,000, the grantee is exempt from the requirements to report:

 - a. Subawards, and
 - b. The total compensation of the five most highly compensated executives of any subrecipient.
5. Definitions.

For purposes of this award term:

 - a. *Federal Agency* means a Federal agency as defined at 5 U.S.C. 551(1) and further clarified by 5 U.S.C. 552(f).
 - b. *Non-Federal Entity* means all of the following, as defined in 2 CFR part 25:
 - I. A Governmental organization, which is a State, local government, or Indian tribe;
 - II. A foreign public entity;
 - III. A domestic or foreign nonprofit organization; and
 - IV. A domestic or foreign for-profit organization.
 - c. *Executive* means officers, managing partners, or any other employees in management positions.
 - d. *Subaward*:
 - I. This term is used as a legal instrument to provide support for the performance of any portion of the substantive project or program for which the grantee received this award and that the grantee as the recipient award to an eligible subrecipient.
 - II. The term does not include the grant award recipient procurement of property and services needed to carry out the project or program (for further explanation, see [2 CFR 200.330]).
 - III. A subaward may be provided through any legal agreement, including an agreement that the grantee or a subrecipient considers a contract.
 - e. *Subrecipient* means a non-Federal entity or Federal agency that:
 - I. Receives a subaward from the grant award recipient under this award; and
 - II. Is accountable to the grantee for the use of the Federal funds provided by the subaward.
 - f. *Total compensation* means the cash and noncash dollar value earned by the executive during the recipient's or subrecipient's preceding fiscal year and includes the following (for more information see 17 CFR 229.402(c)(2)):
 - I. *Salary and bonus.*

- II. *Awards of stock, stock options, and stock appreciation rights.* Use the dollar amount recognized for financial statement reporting purposes with respect to the fiscal year in accordance with the Statement of Financial Accounting Standards No. 123 (Revised 2004) (FAS 123R), Shared Based Payments.
- III. *Earnings for services under non-equity incentive plans.* This does not include group life, health, hospitalization or medical reimbursement plans that do not discriminate in favor of executives, and are available generally to all salaried employees.
- IV. *Change in pension value.* This is the change in present value of defined benefit and actuarial pension plans.
- V. *Above-market earnings on deferred compensation which is not tax-qualified.*
- VI. Other compensation, if the aggregate value of all such other compensation (e.g. severance, termination payments, value of life insurance paid on behalf of the employee, perquisites or property) for the executive exceeds \$10,000.

j. Monitoring, Technical Assistance, and Additional Specific Conditions of Award

All grant recipients, including states and territories managing the Unemployment Insurance programs, are subject to 2 CFR §200.208, *Specific conditions*, which indicates that the Federal awarding agency may adjust specific award conditions as needed. A specific condition is based on an analysis of the following factors:

- (1) Based on the criteria in §200.206, *Federal awarding agency review of risk posed by applicants*;
- (2) The applicant or recipient's history of compliance with the general or specific terms and conditions of a Federal award;
- (3) The applicant or recipient's ability to meet expected performance goals as described in §200.211; or
- (4) A responsibility determination of an applicant or recipient.

Additional Federal award conditions may include items such as the following:

- (1) Requiring payments as reimbursements rather than advance payments;
- (2) Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given performance period;
- (3) Requiring additional, more detailed financial reports;
- (4) Requiring additional project monitoring;
- (5) Requiring the non-Federal entity to obtain technical or management assistance; or
- (6) Establishing additional prior approvals.

Grant recipients may be required to obtain technical or management assistance through an established provider/contractor that has been selected or hired by DOL that may include in-person or remote assistance.

k. Personally Identifiable Information

The grant award recipient(s) must recognize and safeguard Personally Identifiable Information (PII) except where disclosure is allowed by prior written approval of the Grant Officer or by court order. Award recipients must meet the requirements in TEGL No. 39-11, Guidance on the Handling and Protection of PII, can be found at http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7872.

l. Pre-Award

All costs incurred by the award recipient prior to the start date specified in the grant award issued by the Department are *incurred at the recipient's own expense*.

m. Procurement

The Uniform Guidance Procurement Standards at 2 CFR 200.318-327 require all grant award recipients and subrecipients to conduct procurement transactions in a manner that promote practical, open, and free competition. The award recipient's description in the SOW of a specific entity that will provide goods or services does not constitute approval or justification of sole-source procurement from this entity.

The Uniform Guidance (at 2 CFR 200.317) requires States (as defined at 2 CFR 200.1) to follow the same procurement policies and procedures it uses for non-Federal funds. The State must comply with 2 CFR 200.321, 200.322, and 200.323 and ensure that every purchase order or other contract includes any clauses required by § 200.327.

The Uniform Guidance (2 CFR 200.317) require States (as defined at 2 CFR 200.1) to follow the same procurement policies and procedures it uses for non-Federal funds. The state must comply with 2 CFR 200.321, 200.322, and 200.323 and ensure that every purchase order or other contract includes any clauses required by § 200.327. The grant award recipient(s) must also follow the requirements regarding the competitive selection of One-Stop Operators at WIOA Sections 121(d) and 123.

n. Program Income

The *Addition* method as described in 2 CFR 200.307 must be used in allocating any program income generated for this grant award. The grant award recipient must expend all program income prior to drawing down any additional funds as required at 2 CFR 200.305(b)(5) and 2 CFR 200.307(e). Any program income found remaining at the end of period of performance must be returned to ETA. In addition, the grant award recipient(s) must report program income on the quarterly financial report using ETA-9130 form.

o. Recipient Integrity and Performance Matters [for awards exceeding \$500,000]

1. If the total value of the currently active grants, cooperative agreements, and procurement contracts from all Federal awarding agencies exceeds \$10,000,000 for any period of time during the period of performance of this Federal award, then the grant award recipient during that period of time must maintain the currency of information reported to the System for Award Management (SAM) that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System (FAPIIS)) about civil, criminal, or administrative proceedings described in Paragraph 2 of this award term and condition. This is a statutory requirement under Section 872 of Public Law 110-417, as amended (41 U.S.C. 2313). As required by Section 3010 of Public Law 111-212, all information posted in the designated integrity and performance system on or after April 15, 2011, except past performance reviews required for Federal procurement contracts, will be publicly available.
2. Proceedings about which the grant recipient must report. Submit the information required about each proceeding that:
 - a. Is in connection with the award or performance of a grant, cooperative agreement, or procurement contract from the Federal Government;
 - b. Reached its final disposition during the most recent 5-year period; and
 - c. Is one of the following:
 - I. A criminal proceeding that resulted in a conviction, as defined in Paragraph 5. of this award term;
 - II. A civil proceeding that resulted in a finding of fault and liability and paying a monetary fine, penalty, reimbursement, restitution, or damages of \$5,000 or more;
 - III. An administrative proceeding, as defined in Paragraph 5. of this award term, that resulted in a finding of fault and liability and grantee payment of either monetary fine or penalty of \$5,000 or more or a reimbursement, restitution, or damages in excess of \$100,000; or
 - IV. Any other criminal, civil, or administrative proceeding if:
 - (A) It could have led to an outcome described in Paragraph 2.c.I, II, or III of this award term;
 - (B) It had a different disposition arrived at by consent or compromise with an acknowledgment of fault on the grantee's part; and
 - (C) The requirement in this award term to disclose information about the proceeding does not conflict with applicable laws and regulations.
3. Reporting procedures. Enter in SAM, Entity Management area (formerly CCR), or any successor system, the FAPIIS information that SAM requires about each proceeding described in Paragraph 2. of this award term. The grant award recipient does not need to submit the information a second time under assistance awards that were received if the recipient already provided the information through SAM (formerly CCR) because the recipient was required to do so under Federal procurement contracts that the recipient was awarded.

4. Reporting frequency. During any period of time when the grant award recipient is a subject to the requirement in paragraph 1. of this award term, the grantee must report FAPIIS information through SAM no less frequently than semiannually following the initial report of any proceedings for the most recent 5-year period, either to report new information about any proceeding(s) that the grantee has not reported previously or affirm that there is no new information to report.
5. Definitions. For purposes of this award term:
 - a. Administrative proceeding means a non-judicial process that is adjudicatory in nature in order to make a determination of fault or liability (e.g., SEC Administrative proceedings, Civilian Board of Contract Appeals proceedings, and Armed Services Board of Contract Appeals proceedings). This includes proceedings at the Federal and State level. It does not include audits, site visits, corrective plans, or inspection of deliverables.
 - b. Conviction, for purposes of this award term, means a judgment or conviction of a criminal offense by any court of competent jurisdiction, whether entered upon a verdict or a plea, and includes a conviction entered upon a plea of nolo contendere.
 - c. Total value of currently active grants, cooperative agreements, and procurement contracts includes —
 - I. Only the Federal share of the funding under any award with a recipient cost share or match; and
 - II. The value of all options, even if not yet exercised.

p. Reports

All ETA grant award recipients are required to submit quarterly financial and narrative progress reports for each grant award.

- a. **Quarterly Financial Reports.** All ETA grant award recipients are required to report quarterly financial data on the ETA-9130 Form. ETA-9130 reports are due no later than 45 calendar days after the end of each specified reporting quarter. Reporting quarter end dates are March 31, June 30, September 30, and December 31. A final financial report must be submitted no later than 45 calendar days after the quarter ends and the closeout 9130 report must be submitted no later than 90 calendar days after the grant period of performance ends. A closeout report will be submitted during the closeout process. For additional guidance on ETA's financial reporting, reference TEGL 20-19 and https://www.doleta.gov/grants/pdf/ETA-9130_Financial_Reporting_Resources.pdf

The instructions for accessing both the online financial reporting system and the HHS PMS can be found in the transmittal memo accompanying this NOA.

- b. **Quarterly Performance Reports and Quarterly Narrative Reports.** Recipients must submit Quarterly Performance and Quarterly Narrative Reports in accordance with TEGL 14-18, Attachment 6, which can be found at: https://wdr.doleta.gov/directives/attach/TEGL/TEGL_14-18_Attachment-

6_Acc.pdf.

- Workforce Integrated Performance System (WIPS) is the vehicle through which DWG grantees must submit individual records based on the Participant Individual Record Layout (PIRL). The Web-based reporting system is accessed using the following link:
<https://dol.appiancloud.com/suite/>.
- Grantees are required to use the Joint Quarterly Narrative Report Template (ETA-9179) for quarterly performance narrative reporting. Grantees submit the Quarterly Narrative Report using the WIPS reporting system.
- Information on DWGs awarded to states must be included in that state's WIOA Annual Statewide Performance Report Narrative in accordance with the guidance.

c. Project Implementation Plan.

Recipients must adhere to the Project Implementation Plan submission requirements of their respective regional office, in accordance with 20 CFR 687.150. Contact the assigned Federal Project Officer for further details.

q. Requirements for Conference and Conference Space

Conferences sponsored in whole or in part by the grant award recipient are allowable if the conference is necessary and reasonable for the successful performance of the Federal Award. The grant award recipients are urged to use discretion and good judgment to ensure that all conference costs charged to the grant are appropriate and allowable. For more information on the requirements and the allowability of costs associated with conferences, refer to 2 CFR 200.432. Recipients will be held accountable to the requirements in 2 CFR 200.432. Therefore, costs that do not comply with 2 CFR 200.432 will be questioned and may be disallowed.

r. Subawards

A *subaward* means an award provided by a *Pass-Through Entity* (PTE) to a subrecipient for the subrecipient to carry out part of a Federal award received by the PTE. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the PTE considers a contract.

The provisions of the Terms and Conditions of this award will be applied to any subrecipient under this award. The recipient is responsible for monitoring the subrecipient, ensuring that the Terms and Conditions are in all subaward packages and that the subrecipient complies with all applicable regulations and the Terms and Conditions of this award (2 CFR 200.101(b)).

s. Supportive Services & Participant Support Costs

When supportive services are expressly authorized by a program statute, regulation, or FOA, this award waives the prior approval requirement for participant support costs as described in 2 CFR 200.456. Costs must still meet the basic considerations at 2 CFR

200.402 – 200.411. Questions regarding supportive services and participant support costs should be directed to the FPO who is assigned to the grant.

t. System for Award Management (SAM)

SAM is the official federal system that collects, validates, stores, and disseminates business information about the federal government's trading partners in support of contract awards, grants, and electronic payment processes. A SAM registration is required for an entity to be able to apply for federal grants, to request modifications to existing grants, and to enable them to closeout expiring grants. See Training and Employment Notice 18-17 for additional guidance.

Unless the grant award recipient is exempt from this requirement under 2 CFR 25.110, the grantee must maintain current its information in the SAM. This includes information on the recipient's immediate and highest level owner and subsidiaries, as well as on all of the recipient's predecessors that have been awarded a Federal contract or Federal financial assistance within the last three years, if applicable, until the grantee submits the final financial report required under this Federal award or receive the final payment, whichever is later. This requires that the grantee review and update the information at least annually after the initial registration, and more frequently if required by changes in its information or another Federal award term.

1. Unique Entity Identifier Requirements

If the grant award recipient is authorized to make subawards under this award, then the grantee:

- i. Must notify potential subrecipients that no entity (see definitions below) may receive a subaward from the grant award recipient until the entity has provided its unique entity identifier to the grantee.
- ii. May not make a subaward to an entity unless the entity has provided its Unique Entity Identifier to the grantee. Subrecipients are not required to obtain an active SAM registration, but must obtain a Unique Entity Identifier.

NOTE: At some point, the DUNS Number will be replaced by a new, non-proprietary identifier requested in and assigned by SAM.gov. This new identifier is being called the Unique Entity Identifier (UEI), or the Entity ID. Users should continue using the DUNS Number in UEI fields until further notice. To learn more about SAM's rollout of the UEI, please visit gsa.gov/entityid.

2. Definitions

For purposes of this term:

- i. SAM is the Federal repository where the grant award recipients must provide information required for the conduct of business as recipients. Additional information about registration procedures may be found at the SAM website (<http://www.sam.gov>).
- ii. *Unique entity identifier* means the identifier assigned by SAM to uniquely identify business entities.
- iii. *Entity*, as it is used in this grant award term, includes all of the following, as defined at 2 CFR Part 25, Appendix A:

- a. A non-Federal entity as defined at 2 CFR 200.1 (A State, local government, Indian Tribe, Institute of Higher Education (IHE), or nonprofit organization that carries out a Federal award as a recipient or subrecipient);
- b. A foreign organization;
- c. A foreign public entity;
- d. A domestic for-profit organization; and
- e. A Federal agency.

iv. *Subaward* means:

An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

v. *Subrecipient* means:

An entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a Federal award; but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

3. Existing SAM Registrants

ETA advises grant recipients registered in SAM to review their registration information, particularly their financial information and points of contact. Assistance is available by contacting the Federal Service Desk at www.fsd.gov. Grant recipients should contact ETA at ETAAccountingGrants@dol.gov if they find that payments have been paid to a bank account other than their registered bank account.

ETA further encourages grant recipients to review the expiration date of their SAM registration and begin the renewal process well in advance, to ensure that their registration remains valid. If the grant recipient has not logged in and updated its entity registration record within at least the past 365 days, its record will expire and go into inactive status. Timely renewal will ensure that the grant recipient can continue to request and receive modifications to their existing grants, as well as apply for new funding opportunities. Further, the DUNS and EIN numbers must remain active until the grant award closeout process is fully completed.

4. Validation

ETA routinely checks the validity of a grant recipient's SAM registration and verifies that the recipient isn't included on the excluded parties list before making a grant award, or approving a modification to an existing award. Failure to have an active SAM registration can delay grant recipients from receiving their initial award or requested modifications to their existing awards.

u. Vendor/Contractor

The term “contractor,” sometimes referred to as a vendor, is a dealer, distributor, merchant or other seller providing goods or services that are required to implement a Federal program (see 2 CFR 200.1). These goods or services may be for an organization's own use or for the use of the beneficiaries of the Federal program. Additional guidance on distinguishing between a subrecipient and a contractor (vendor) is provided in 2 CFR 200.331. When procuring contractors for goods and services, DOL/ETA recipients and subrecipients, must follow the procurement requirements found at 2 CFR 200.319, except states, pursuant to 2 CFR 200.317, which calls for free and open competition.

v. Whistleblower Protection

This grant award and employees working on this grant award are subject to the whistleblower rights and remedies established at 41 U.S.C. 4712. The grant award recipient shall inform its employees in writing, in the predominant language of the workforce, of employee whistleblower rights and protections under 41 U.S.C. 4712, as described in section 3.908 of the Federal Acquisition Regulation (48 CFR 3.908; note that for the purpose of this term and condition, use of the term "contract," "contractor," "subcontract," or "subcontractor" in section 3.908 should be read as "grant," "grantee," "subgrant," or "subgrantee"). The recipient shall insert the substance of this clause in all subgrants and contracts over the Simplified Acquisition Threshold.

w. Telecommunications

Title 2 CFR §200.216 Prohibition on certain telecommunications and video surveillance services or equipment. (Effective August 13, 2020)

(a) Recipients and subrecipients are prohibited from obligating or expending loan or grant funds to: (1) Procure or obtain; (2) Extend or renew a contract to procure or obtain; or (3) Enter into a contract (or extend or renew a contract) to procure or obtain equipment, services, or systems that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system. As described in Public Law 115-232, section 889, covered telecommunications equipment is telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities).

(i) For the purpose of public safety, security of government facilities, physical security surveillance of critical infrastructure, and other national security purposes, video surveillance and telecommunications equipment produced by Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities). (ii) Telecommunications or video surveillance services provided by such entities or using such equipment. (iii) Telecommunications or video surveillance equipment or services produced or provided by an entity that the Secretary of Defense, in consultation with the Director of the National Intelligence or the Director of the Federal Bureau of Investigation, reasonably believes to be an entity owned or controlled by, or otherwise connected to, the government of a covered foreign country. (b) In implementing the prohibition under

Public Law 115-232, section 889, subsection (f), paragraph (1), heads of executive agencies administering loan, grant, or subsidy programs shall prioritize available funding and technical support to assist affected businesses, institutions and organizations as is reasonably necessary for those affected entities to transition from covered communications equipment and services, to procure replacement equipment and services, and to ensure that communications service to users and customers is sustained. (c) See Public Law 115-232, section 889 for additional information. (d) See also §200.471.

x. Intellectual Property Rights

The Federal Government reserves a paid-up, nonexclusive and irrevocable license to reproduce, publish or otherwise use, and to authorize others to use for federal purposes: i) the copyright in all products developed under the grant, including a subgrant or contract under the grant or subgrant; and ii) any rights of copyright to which the grant award recipient, subrecipient or a contractor purchases ownership under an award (including but not limited to curricula, training models, technical assistance products, and any related materials). Such uses include, but are not limited to, the right to modify and distribute such products worldwide by any means, electronically or otherwise.

Federal funds may not be used to pay any royalty or license fee for use of a copyrighted work, or the cost of acquiring by purchase a copyright in a work, where the DOL/ETA has a license or rights of free use in such work, although they may be used to pay costs for obtaining a copy which is limited to the developer/seller costs of copying and shipping.

If revenues are generated by selling products developed with grant funds, including intellectual property, these revenues are considered as program income. Program income must be used in accordance with the provisions of this grant award and 2 CFR 200.307.

The following language must be on all workforce 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 (DOL)’s Employment and Training Administration (ETA). The product was created by the recipient and does not necessarily reflect the official position of DOL/ETA. DOL/ETA 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. This product is copyrighted by the institution that created it.”

y. Intellectual Property Rights and the Bayh-Dole Act [for discretionary awards]

All small business firms, and non-profit organizations (as defined at the link below, and including Institutions of Higher Education) must adhere to the Bayh-Dole Act, which requirements are provided at 37 CFR 401.3(a) and at

<https://doleta.gov/grants/pdf/BayhDoleGrantTerm.pdf>. To summarize, these requirements describe the ownership of intellectual property rights and the government's nonexclusive, nontransferable, irrevocable, paid-up license to use any invention conceived or first actually reduced to practice in the performance of work under this grant award. These requirements are in addition to those found in the Intellectual Property Rights term above.

z. Domestic Preferences for Procurements

As appropriate and to the extent consistent with law, the non-Federal entity should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of 2 CFR Part 200.322 must be included in all subawards including all contracts and purchase orders for work or products under this award.

13. Program Requirements

[Training and Employment Guidance Letter \(TEGL\) WIOA No. 12-19](#) contains the program requirements for this award.

14. FY 2021 Federal Appropriations Requirements

a. Requirement to Provide Certain Information in Public Communications

Pursuant to P.L. 116-260, Division H, Title V, Section 505, when issuing statements, press releases, requests for proposals, bid solicitations and other documents describing projects or programs funded in whole or in part with Federal money, all non-Federal entities receiving Federal funds shall clearly state:

1. The percentage of the total costs of the program or project which will be financed with Federal money;
2. The dollar amount of Federal funds for the project or program; and
3. The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.

The requirements of this term are separate from those in 2 CFR Part 200 and, when applicable, both must be complied with.

b. Fair Labor Standards Act Amendment for Major Disasters

Pursuant to P.L. 116-260, Division H, Title I, Section 108, the Fair Labor Standards Act of 1938 (FLSA) will apply as if the following language was added to Section 7 (the Maximum Hours Worked Section). This language specifically relates to occurrences of a major disaster (as declared or designated by the state or federal government) and are applied for a period of two years afterwards. The language is as follows:

“(s)(1) The provisions of this section [maximum hours worked] shall not apply for a period of 2 years after the occurrence of a major disaster to any employee—

(A) employed to adjust or evaluate claims resulting from or relating to such major disaster, by an employer not engaged, directly or through an affiliate, in underwriting, selling, or marketing property, casualty, or liability insurance policies or contracts;

(B) who receives from such employer on average weekly compensation of not less than \$591.00 per week or any minimum weekly amount established by the Secretary, whichever is greater, for the number of weeks such employee is engaged in any of the activities described in subparagraph (C); and (C) whose duties include any of the following:

(i) interviewing insured individuals, individuals who suffered injuries or other damages or losses arising from or relating to a disaster, witnesses, or physicians;

(ii) inspecting property damage or reviewing factual information to prepare damage estimates;

(iii) evaluating and making recommendations regarding coverage or compensability of claims or determining liability or value aspects of claims;

(iv) negotiating settlements; or

(v) making recommendations regarding litigation.

(2) The exemption in this subsection shall not affect the exemption provided by section 13(a)(1) [of the FLSA].

(3) For purposes of this subsection—

(A) the term ‘major disaster’ means any disaster or catastrophe declared or designated by any State or Federal agency or department;

(B) the term ‘employee employed to adjust or evaluate claims resulting from or relating to such major disaster’ means an individual who timely secured or secures a license required by applicable law to engage in and perform the activities described in clauses (i) through (v) of paragraph (1)(C) relating to a major disaster, and is employed by an employer that maintains worker compensation insurance coverage or protection for its employees, if required by applicable law, and withholds applicable Federal, State, and local income and payroll taxes from the wages, salaries and any benefits of such employees; and

(C) the term ‘affiliate’ means a company that, by reason of ownership or control of 25% or more of the outstanding shares of any class of voting securities of one or more companies, directly or indirectly, controls, is controlled by, or is under common control with, another company.”

C. Health Benefits Coverage for Contraceptives

Federal funds may not be used to enter into or renew a contract which includes a provision for prescription drug coverage unless the contract also includes a provision for contraceptive coverage. This requirement does not apply to contracts with 1) the religious plans Personal Care’s HMO and OSF HealthPlans, Inc. and 2) any existing or future plan if the carrier for the plan objects to such coverage on the basis of religious beliefs.

In implementing this section, any plan that enters into or renews a contract may not subject any individual to discrimination on the basis that the individual refuses to prescribe or otherwise provide for contraceptives because such activities would be

contrary to the individuals' religious beliefs or moral convictions. Nothing in this term shall be construed to require coverage of abortion or abortion related services.

d. Privacy Act

No funds can be used in contravention of 5 U.S.C. 552a (the Privacy Act) or regulations implementing the Privacy Act.

e. Prohibition on Contracting with Corporations with Felony Criminal Convictions

The recipient may not knowingly enter into a contract, memorandum of understanding, or cooperative agreement with, make a grant to, or provide a loan or loan guarantee to, any corporation that was convicted of a felony criminal violation under any Federal law within the preceding 24 months.

f. Prohibition on Contracting with Corporations with Unpaid Tax Liabilities

The grant award recipient may not knowingly enter into a contract, memorandum of understanding, or cooperative agreement with, make a grant to, or provide a loan or loan guarantee to, any corporation that has any unpaid Federal tax liability that has been assessed, for which all judicial and administrative remedies have been exhausted or have lapsed, and that is not being paid in a timely manner pursuant to an agreement with the authority responsible for collecting the tax liability.

g. Prohibition on Procuring Goods Obtained Through Child Labor

Pursuant to P.L. 116-260, Division H, Title I, Section 103, no funds may be obligated or expended for the procurement of goods mined, produced, manufactured, or harvested or services rendered, in whole or in part, by forced or indentured child labor in industries and host countries identified by the DOL prior to December 20, 2019. DOL has identified these goods and services here: <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-products>.

h. Prohibition on Providing Federal Funds to Association of Community Organizations for Reform Now (ACORN)

Pursuant to P.L. 116-260, Division H, Title V, Section 521, these funds may not be provided to the ACORN, or any of its affiliates, subsidiaries, allied organizations or successors.

i. Reporting of Waste, Fraud and Abuse

No entity receiving federal funds may require employees or contractors of such entity seeking to report fraud, waste, or abuse to sign internal confidentiality agreements or

statements prohibiting or otherwise restricting such employees or contractors from lawfully reporting such waste, fraud, or abuse to a designated investigative or law enforcement representative of a Federal department or agency authorized to receive such information.

j. Requirement for Blocking Pornography

Pursuant to P.L. 116-260, Division H, Title V, Section 520, no Federal funds may be used to maintain or establish a computer network unless such network blocks the viewing, downloading, and exchanging of pornography.

k. Restriction on Health Benefits Coverage for Abortions

Pursuant to P.L. 116-260, Division H, Title V, Section 506 and 507, Federal funds may not be expended for health benefits coverage that includes coverage of abortions, except when the pregnancy is the result of rape or incest, or in the case where a woman suffers from a physical disorder, physical injury, or physical illness, including a life-endangering physical condition caused by or arising from the pregnancy itself that would, as certified by a physician, place the women in danger of death unless an abortion is performed. This restriction does not prohibit any non-Federal entity from providing health benefits coverage for abortions when all funds for that specific benefit do not come from a Federal source. Additionally, no funds made available through this grant award may be provided to a State or local government if such government subjects any institutional or individual health care entity to discrimination on the basis that the health care entity does not provide, pay for, provide coverage of, or refer for abortions.

l. Restriction on Lobbying/Advocacy

Pursuant to P.L. 116-260, Division H, Title V, Section 503, no federal funds may be used to pay the salary or expenses of any grant recipient, or agent acting for such recipient, related to any activity designed to influence the enactment of legislation, appropriations, regulation, administrative action, or executive order proposed or pending before the Congress or any state government, state legislature or local legislature or legislative body, other than for normal and recognized executive–legislative relationships or participation by an agency or officer of a state, local or tribal government in policymaking and administrative processes within the executive branch of that government.

m. Publicity

Pursuant to P.L. 116-260, Division H, Title V, Section 503, the grant award recipient is not authorized to use any funds provided under this grant award—other than for normal and recognized executive–legislative relationships—for publicity or propaganda purposes, for the preparation, distribution or use of any kit, pamphlet, booklet, publication, electronic communication, radio, television, or video presentation, designed to support or defeat legislation pending before the Congress or any state or local legislature or legislative body, except in presentation to the Congress or any state or local legislature itself, or designed to support or defeat any proposed or pending regulation,

administrative action, or order issued by the executive branch of any state or local government, except in presentation to the executive branch of any state or local government itself.

n. Restriction on the Promotion of Drug Legalization

Pursuant to P.L. 116-260, Division H, Title V, Section 509, no Federal funds shall be used for any activity that promotes the legalization of any drug or other substance included in Schedule I of the schedules of controlled substances established under Section 202 of the Controlled Substances Act except for normal and recognized executive-congressional communications or where there is significant medical evidence of a therapeutic advantage to the use of such drug or other substance or that federally sponsored clinical trials are being conducted to determine therapeutic advantage.

o. Restriction on Purchase of Sterile Needles or Syringes

Pursuant to P.L. 116-260, Division H, Title V, Section 527, no Federal funds shall be used to purchase sterile needles or syringes for the hypodermic injection of any illegal drug.

p. Salary and Bonus Limitations

Pursuant to P.L. 116-260, Division H, Title I, Section 105, recipients and subrecipients shall not use funds to pay the salary and bonuses of an individual, either as direct costs or as indirect costs, at a rate in excess of Executive Level II. The Executive Level II salary may change yearly and is located on the OPM.gov website (<http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2020/executive-senior-level>). The salary and bonus limitation does not apply to contractors (vendors) providing goods and services as defined in 2 CFR 200.331. Where States are recipients of such funds, States may establish a lower limit for salaries and bonuses of those receiving salaries and bonuses from subrecipients, taking into account factors including the relative cost-of-living in the State, the compensation levels for comparable State or local government employees, and the size of the organizations that administer Federal programs involved including ETA programs. See TEGL 5-06 for further clarification, available at http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2262.

15. Public Policy

a. Architectural Barriers

The Architectural Barriers Act of 1968, 42 U.S.C. 4151 et seq., as amended, the Federal Property Management Regulations (see 41 CFR 102-76), and the Uniform Federal Accessibility Standards issued by the U.S. General Services Administration (GSA) (see 36 CFR 1191, Appendixes C and D) set forth requirements to make facilities accessible to, and usable by, the physically handicapped and include minimum design standards. All new facilities designed or constructed with grant support must comply with these requirements.

b. Drug-Free Workplace

The Drug-Free Workplace Act of 1988, 41 U.S.C. 702 *et seq.*, and 2 CFR 182 require that all award recipients receiving grants from any Federal agency maintain a drug-free workplace. The award recipient must notify the awarding office if an employee of the recipient is convicted of violating a criminal drug statute. Failure to comply with these requirements may be cause for suspension or debarment.

c. Executive Orders

12928: Pursuant to Executive Order (EO) 12928, the grant award recipient is strongly encouraged to provide subcontracting/subgranting opportunities to Historically Black Colleges and Universities and other Minority Institutions such as Hispanic-Serving Institutions and Tribal Colleges and Universities; and to Small Businesses Owned and Controlled by Socially and Economically Disadvantaged Individuals.

13043: Pursuant to EO 13043, Increasing Seat Belt Use in the United States, dated April 16, 1997, the grant award recipients are encouraged to adopt and enforce on-the-job seat belt policies and programs for their employees when operating company-owned, rented, or personally owned vehicles.

13166: As clarified by EO 13166, Improving Access to Services for Persons with Limited English Proficiency, dated August 11, 2000, and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI, recipients must take reasonable steps to ensure that LEP persons have meaningful access to programs in accordance with DOL's Policy Guidance on the Prohibition of National Origin Discrimination as it Affects Persons with Limited English Proficiency [05/29/2003] Volume 68, Number 103, pages 32289-32305. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. The grant award recipients are encouraged to consider the need for language services for LEP persons served or encountered both in developing budgets and in conducting programs and activities. For assistance and information regarding your LEP obligations, go to <http://www.lep.gov>.

13513: Pursuant to EO 13513, Federal Leadership On Reducing Text Messaging While Driving, dated October 1, 2009, the grant award recipients and subrecipients are encouraged to adopt and enforce policies that ban text messaging while driving company-owned or -rented vehicles or government-owned vehicles (GOV), or while driving privately-owned vehicles (POV) when on official Government business or when performing any work for or on behalf of the Government. Recipients and subrecipients are also encouraged to conduct initiatives of the type described in section 3(a) of this order.

d. Flood Insurance

The Flood Disaster Protection Act of 1973, as amended, 42 U.S.C. 4001 *et seq.*, provides

that no Federal financial assistance to acquire, modernize, or construct property may be provided in communities in the United States identified as flood-prone, unless the community participates in the National Flood Insurance Program and flood insurance is purchased within 1 year of the identification. The flood insurance purchase requirement applies to both public and private applicants for the DOL support. Lists of flood-prone areas that are eligible for flood insurance are published in the Federal Register by FEMA.

e. Hotel-Motel Fire Safety

Pursuant to 15 U.S.C. 2225a, the recipient must ensure that all space for conferences, and, conventions or training seminars funded in whole or in part with federal funds complies with the protection and control guidelines of the Hotel and Motel Fire Safety Act (P.L. 101-391, as amended). Recipients may search the Hotel-Motel National Master List at <https://apps.usfa.fema.gov/hotel/> to see if a property is in compliance, or to find other information about the Act.

f. Prohibition on Trafficking in Persons

1. Trafficking in persons.

a. Provisions applicable to a recipient that is a private entity.

I. The grantee as the recipient, the grantee's employees, subrecipients under this award, and subrecipients' employees may not—

(A). Engage in severe forms of trafficking in persons during the period of time that the grant award is in effect;

(B). Procure a commercial sex act during the period of time that the award is in effect; or

(C). Use forced labor in the performance of the award or subawards under the award.

II. DOL/ETA as the Federal awarding agency may unilaterally terminate this grant award, without penalty, if the grantee or a subrecipient that is a private entity —

(A). Is determined to have violated a prohibition in paragraph a.1 of this award term; or

(B). Has an employee who is determined by the agency official authorized to terminate the award to have violated a prohibition in paragraph a.1 of this award term through conduct that is either—

i. Associated with performance under this award; or

ii. Imputed to you or the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR Part 180, “OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement),” as implemented by our agency at 2 CFR Part 2998.

b. Provision applicable to a recipient other than a private entity. DOL/ETA as the Federal awarding agency may unilaterally terminate this grant award, without penalty, if a subrecipient that is a private entity—

I. Is determined to have violated an applicable prohibition in paragraph a.1 of this grant award term; or

II. Has an employee who is determined by the agency official authorized to terminate the award to have violated an applicable prohibition in paragraph a.1 of this grant award term through conduct that is either—

(A). Associated with performance under this award; or

(B). Imputed to the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR part 180, “OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement),” as implemented by our agency at 29 CFR Part 98.

c. Provisions applicable to any recipient.

I. The grant award recipient must inform DOL/ETA immediately of any information the grantee receive from any source alleging a violation of a prohibition in paragraph a.1 of this grant award term.

II. DOL/ETA right to terminate unilaterally that is described in paragraph a.2 or b of this section:

(A). Implements section 106(g) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7104(g)), and

(B). Is in addition to all other remedies for noncompliance that are available to DOL/ETA under this grant award.

III. The grant award recipient must include the requirements of paragraph a.1 of this grant award term in any subaward the grantee make to a private entity.

d. Definitions. For purposes of this award term:

I. “Employee” means either:

(A). An individual employed by the grant award recipient or a subrecipient who is engaged in the performance of the project or program under this award; or

(B). Another person engaged in the performance of the project or program under this grant award and not compensated by the grantee including, but not limited to, a volunteer or individual whose services are contributed by a third party as an in-kind contribution toward cost sharing or matching requirements.

II. “Forced labor” means labor obtained by any of the following methods: the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

III. “Private entity”:

(A). Means any entity other than a State, local government, Indian tribe, or foreign public entity, as those terms are defined in 2 CFR 175.25.

(B). Includes:

i. A nonprofit organization, including any nonprofit institution of higher education, hospital, or tribal

organization other than one included in the definition of Indian tribe at 2 CFR 175.25(b).

ii. A for-profit organization.

IV. “Severe forms of trafficking in persons,” “commercial sex act,” and “coercion” have the meanings given at section 103 of the TVPA, as amended (22 U.S.C. 7102).

g. Veterans’ Priority Provisions

The Jobs for Veterans Act (Public Law 107-288) requires grant award recipients to provide priority service to veterans and spouses of certain veterans for the receipt of employment, training, and placement services in any job training program directly funded, in whole or in part, by the DOL. The regulations implementing this priority of service can be found at 20 CFR Part 1010. In circumstances where a grant award recipient must choose between two qualified candidates for a service, one of whom is a veteran or eligible spouse, the veterans priority of service provisions require that the grant award recipient give the veteran or eligible spouse priority of service by first providing him or her that service. To obtain priority of service, a veteran or spouse must meet the program’s eligibility requirements. Recipients must comply with the DOL guidance on veterans’ priority. ETA’s TEGL No. 10-09 (issued November 10, 2009) provides guidance on implementing priority of service for veterans and eligible spouses in all qualified job training programs funded in whole or in part by DOL. TEGL No. 10-09 is available at http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2816.

h. Promoting Equitable Delivery of Government Benefits and Equal Opportunity

The Department of Labor (Labor) seeks to affirmatively advance equity, civil rights and equal opportunity in the policies, programs and services it provides. Therefore, consistent with Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, grant recipients must execute the terms and conditions of their grant in a manner that advances equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. This extends to all grant activities including, but not limited to, service delivery, selection of subrecipients and contractors, and procurement of goods and services. Government programs are designed to serve all eligible individuals, and Labor’s grantees should make services the goods and services they provide pursuant to their grants widely available with the goals of effectively serving a diverse population of eligible individuals; fairly, justly, and impartially administering the grant evaluation and award processes. Grantees are encouraged to engage in contracting and subcontracting for goods and services related to performing the terms and conditions of their grants in such a way to achieve equity.

The term “equity” means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color;

members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

The term “underserved communities” refers to populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life, as exemplified by the list in the preceding definition of “equity.”

i. Harassment Prohibited

The grant recipient and any subrecipients are prohibited from engaging in harassment of an individual based on race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, based on citizenship status or participation in any WIOA Title I-financially assisted program or activity. Harassing conduct of this type is a violation of the nondiscrimination provisions of WIOA and of 29 CFR Part 38.

a) Unwelcome sexual advances, requests for sexual favors, or offensive remarks about a person's race, color, religion, sex, national origin, age, disability, political affiliation or belief, or citizenship or participation, and other unwelcome verbal or physical conduct based on one or more of these protected categories constitutes unlawful harassment on that basis when:

(1) Submission to such conduct is made either explicitly or implicitly a term or condition of accessing the aid, benefit, service, or training of, or employment in the administration of or in connection with, any WIOA Title I-financially assisted program or activity;

(2) Submission to, or rejection of, such conduct by an individual is used as the basis for limiting that individual's access to any aid, benefit, service, training, or employment from, or employment in the administration of or in connection with, any WIOA Title I-financially assisted program or activity; or

(3) Such conduct has the purpose or effect of unreasonably interfering with an individual's participation in a WIOA Title I-financially assisted program or activity creating an intimidating, hostile or offensive program environment.

b) Harassment because of sex includes harassment based on gender identity or sexual orientation; harassment based on failure to comport with sex stereotypes; and harassment based on pregnancy, childbirth, and related medical conditions. Sex-based harassment may include harassment that is not sexual in nature but that is because of sex or where one sex is targeted for the harassment.

16. Technical Assistance, Resources, and Information

Additional resources, training, and information to assist the grant award recipient are located on the ETA website at <https://www.dol.gov/agencies/eta/grants/resources> and on the Grants Application and Management collection page on WorkforceGPS.org at <https://grantsapplicationandmanagement.workforcegps.org/>. **SMART** training is a technical assistance initiative sponsored by DOL-ETA to assist its grant recipients and subrecipients in improving its program/project operations through effective grants management. Please take some time to review the training modules which are focused on:

Strategies for sound grant management that include:

Monitoring,

Accountability,

Risk mitigation and

Transparency.

These four themes are woven throughout the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, also known as the Uniform Guidance (2 CFR Part 200 and 2 CFR Part 2900). The 508-compliant PowerPoint of the modules may be found on WorkforceGPS.org at the [Resource](#) page.

17. Attachments

Attachment A: SF-424

Attachment B: SF-424A

Attachment C: Budget Narrative

Attachment D: Statement of Work

Attachment E: Negotiated Indirect Cost Rate Agreement

Attachment A: SF-424

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

08/18/2021

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Pima County

* b. Employer/Taxpayer Identification Number (EIN/TIN):

86-6000543

* c. Organizational DUNS:

0337386620000

d. Address:

* Street1:

2797 E. Ajo Way

Street2:

* City:

Tucson

County/Parish:

* State:

AZ: Arizona

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

85713-6223

e. Organizational Unit:

Department Name:

Community and Workforce Dev.

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Amber

Middle Name:

* Last Name:

Wells

Suffix:

Title:

Organizational Affiliation:

* Telephone Number:

520-724-6740

Fax Number:

* Email:

Amber.wells@pima.gov

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Employment and Training Administration

11. Catalog of Federal Domestic Assistance Number:

17.277

CFDA Title:

WIOA National Dislocated Worker Grants / WIA National Emergency Grants

* 12. Funding Opportunity Number:

ETA-TEGL-25-20

* Title:

CAREER (Comprehensive and Accessible Reemployment through Equitable Employment Recovery) National Dislocated Worker Grants

13. Competition Identification Number:

ETA-TEGL-25-20

Title:

CAREER (Comprehensive and Accessible Reemployment through Equitable Employment Recovery) National Dislocated Worker Grants

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

CAREER Pima County

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

| | |
|---------------------|---|
| * a. Federal | <input type="text" value="365,535.00"/> |
| * b. Applicant | <input type="text" value="0.00"/> |
| * c. State | <input type="text" value="0.00"/> |
| * d. Local | <input type="text" value="0.00"/> |
| * e. Other | <input type="text" value="0.00"/> |
| * f. Program Income | <input type="text" value="0.00"/> |
| * g. TOTAL | <input type="text" value="365,535.00"/> |

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed:

Attachment B: SF-424A

BUDGET INFORMATION - Non-Construction Programs

OMB Number: 4040-0006
Expiration Date: 02/28/2022

SECTION A - BUDGET SUMMARY

| Grant Program Function or Activity (a) | Catalog of Federal Domestic Assistance Number (b) | Estimated Unobligated Funds | | New or Revised Budget | | |
|--|--|-----------------------------|--------------------|-----------------------|--------------------|---------------|
| | | Federal (c) | Non-Federal (d) | Federal (e) | Non-Federal (f) | Total (g) |
| 1. Comprehensive and Accessible Reemployment through Equitable Employment Recovery (CAREER) TEGL 25-20 | 17.277 | \$ 365,535.00 | \$ | \$ | \$ | \$ 365,535.00 |
| 2. | | | | | | |
| 3. | | | | | | |
| 4. | | | | | | |
| 5. Totals | | \$ 365,535.00 | \$ | \$ | \$ | \$ 365,535.00 |

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SECTION B - BUDGET CATEGORIES

| 6. Object Class Categories | GRANT PROGRAM, FUNCTION OR ACTIVITY | | | | Total (5) |
|--|---|-----|-----|-----|---------------|
| | (1) | (2) | (3) | (4) | |
| | Comprehensive and Accessible Reemployment through Equitable Employment Recovery (CAREER) TEGL 25-20 | | | | |
| a. Personnel | \$ 163,987.00 | \$ | \$ | \$ | \$ 163,987.00 |
| b. Fringe Benefits | 60,208.00 | | | | 60,208.00 |
| c. Travel | 517.00 | | | | 517.00 |
| d. Equipment | 92,300.00 | | | | 92,300.00 |
| e. Supplies | | | | | |
| f. Contractual | | | | | |
| g. Construction | | | | | |
| h. Other | 23,683.00 | | | | 23,683.00 |
| i. Total Direct Charges (sum of 6a-6h) | 340,695.00 | | | | \$ 340,695.00 |
| j. Indirect Charges | 24,840.00 | | | | \$ 24,840.00 |
| k. TOTALS (sum of 6i and 6j) | \$ 365,535.00 | \$ | \$ | \$ | \$ 365,535.00 |
| 7. Program Income | \$ | \$ | \$ | \$ | \$ |

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| SECTION C - NON-FEDERAL RESOURCES | | | | | |
|-----------------------------------|---|---------------|-----------|-------------------|-----------|
| (a) Grant Program | | (b) Applicant | (c) State | (d) Other Sources | (e)TOTALS |
| 8. | Comprehensive and Accessible Reemployment through Equitable Employment Recovery (CAREER) TEGL 25-20 | \$ 0.00 | \$ 0.00 | \$ 0.00 | \$ 0.00 |
| 9. | | | | | |
| 10. | | | | | |
| 11. | | | | | |
| 12. TOTAL (sum of lines 8-11) | | \$ 0.00 | \$ 0.00 | \$ 0.00 | \$ 0.00 |

| SECTION D - FORECASTED CASH NEEDS | | | | | |
|------------------------------------|--------------------|--------------|--------------|--------------|--------------|
| | Total for 1st Year | 1st Quarter | 2nd Quarter | 3rd Quarter | 4th Quarter |
| 13. Federal | \$ 240,501.00 | \$ 60,126.00 | \$ 60,125.00 | \$ 60,125.00 | \$ 60,125.00 |
| 14. Non-Federal | \$ | | | | |
| 15. TOTAL (sum of lines 13 and 14) | \$ 240,501.00 | \$ 60,126.00 | \$ 60,125.00 | \$ 60,125.00 | \$ 60,125.00 |

| SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT | | | | | |
|---|---|--------------------------------|------------|-----------|------------|
| (a) Grant Program | | FUTURE FUNDING PERIODS (YEARS) | | | |
| | | (b)First | (c) Second | (d) Third | (e) Fourth |
| 16. | Comprehensive and Accessible Reemployment through Equitable Employment Recovery (CAREER) TEGL 25-20 | \$ 125,034.00 | \$ | \$ | \$ |
| 17. | | | | | |
| 18. | | | | | |
| 19. | | | | | |
| 20. TOTAL (sum of lines 16 - 19) | | \$ 125,034.00 | \$ | \$ | \$ |

| SECTION F - OTHER BUDGET INFORMATION | |
|--------------------------------------|--------------------------------|
| 21. Direct Charges: \$340,695 | 22. Indirect Charges: \$24,840 |
| 23. Remarks: | |

Attachment C: Budget Narrative

**Pima County CAREER CMS
Budget Narrative
CAREER TEGL 25-20**

This budget narrative presents each federal budget category, explaining each line item, and describing the each cost basis. All costs are based on prior experience delivering similarly scoped projects and cost pricing research, and take into account any allowable discounts. All expenses are direct expenses to the grant unless specifically designated as leverage. Pima County requests a total of \$365,535 for 2 years of the CAREER Grant Program, with a leveraged contribution of \$262,700. This grant request equals \$209 per Dislocated Worker for the estimated 1,750 participants. Pima County maintains detailed internal control procedures, including review of all expenditures to confirm allowability.

Personnel:

The grant will fund five positions. Workforce Development Specialist Amber Wells will be .67 FTE at an annual salary of \$40,242.54. Her roles include project management, platform design, system research, and training lead. Program Coordinator Jennifer Eckstrom will be .15 FTE at an annual salary of \$74,999.86. Her duties as outreach coordinator include faith based partner outreach, social media outreach, and community partner training. Special Staff Assistant Senior Marcelino Flores will be .25 FTE at an annual salary of \$48,478.82. His role entails program coordination and system research. Program Coordinator Dalila Perez will be .33 FTE at an annual salary of \$52,199.68. Her duties include coordinating between IT and CWD Departments, CMS troubleshooting, platform rollout, graphics and marketing support to create forms and marketing materials, and coding training. Admin Support Specialist Marco Favela will be .33 FTE at an annual salary of \$43,744.22. Similar to Dalila Perez, his roles entail coordinating between the IT and CWD Departments, CMS troubleshooting, system rollout, graphics and marketing support to create forms and marketing materials, and coding training. Personnel totals were calculated by multiplying annual salaries by full-time-equivalency percentages, multiplied by the grant period of performance, two years.

| a. Personnel | Salary | FTE | Annual Total | Years | Total |
|--|---------------|------------|---------------------|--------------|------------------|
| Amber Wells, Workforce Development Specialist | \$40,242.54 | 0.67 | \$26,962.5 | 2 | \$53,925 |
| Jennifer Eckstrom, Program Coordinator | \$74,999.86 | 0.15 | \$11,249.98 | 2 | \$22,500 |
| Marcelino Flores, Special Staff Assistant Senior | \$48,478.82 | 0.25 | \$12,119.71 | 2 | \$24,239 |
| Dalila Perez, Program Coordinator | \$52,199.68 | 0.33 | \$17,225.89 | 2 | \$34,452 |
| Marco Favela, Admin Support Specialist | \$43,744.22 | 0.33 | \$14,435.59 | 2 | \$28,871 |
| TOTAL PERSONNEL | | | | | \$163,987 |

Fringe Benefits:

Fringe benefits for all staff are calculated based on individual benefit elections. Benefits include percentages of the following elements: Social Security, Medicare, Arizona Retirement System (mandatory), workers compensation, long-term disability, unemployment insurance, health savings account, employee assistance program, and, life, health, and dental insurance. Fringe benefits were calculated by multiplying individual labor totals by the corresponding employee's fringe benefit rate, then summed to equal the Total Fringe.

| b. Fringe Benefits | Grant Total | Fringe Benefit % | Total |
|---------------------------|--------------------|-------------------------|-----------------|
| Amber Wells | \$53,925 | 0.5433 | \$29,297 |
| Jennifer Eckstrom | \$22,500 | 0.4465 | \$10,046 |
| Marcelino Flores | \$24,239 | 0.2074 | \$5,027 |
| Dalila Perez | \$34,452 | 0.2073 | \$7,142 |
| Marco Favela | \$28,871 | 0.3012 | \$8,696 |
| TOTAL FRINGE | | | \$60,208 |

Travel:

Pima County plans to travel to 20 libraries and community centers across Pima County to deliver trainings and marketing materials about the new Client Management System. Distances to and from the centers range from 4 miles to the Quince Douglas Library to 280 miles to the Ajo Library. The total

number of miles to and from library and community centers is 924 miles. Travel was calculated by multiplying the number of estimated miles by the federal mileage reimbursement rate of 2021, \$0.56.

| c. Travel | Miles | Cost | Total |
|---|--------------|-------------|--------------|
| Staff mileage (libraries & community centers) | 924 | 0.56 | \$517 |
| TOTAL TRAVEL | | | \$517 |

Equipment:

Pima County requires the following equipment: Client Management System (CMS) IT platform, and three add-ons to upgrade the functionality of the CMS. Pima County is currently collecting and refining requirements for the CMS system. This budget section consists of both grant request and Pima County leveraged contribution. Pima County estimates the cost of the CMS IT platform by combining a CMS pricing quote from a stalled CMS replacement effort in 2017 with current online pricing research. The 2017 price quote estimated both the first year acquisition cost and the five-year total cost, which led to the yearly service fee estimate. Estimating the cost of three add-ons for the CMS system is more difficult to predict. Pima County will not be able to identify and prioritize which additional functionality it needs until it releases the new CMS. Additionally, IT add-ons have a wide range of cost estimates, which depend on the scope of the application or module. Pima County settled on an estimate for each add-on slightly higher than median given online cost ranges. However, as per TEGl instructions, Pima County will give more detailed cost and implementation schedules prior to expending grant funds on the IT system and add-on equipment.

Since the IT system equipment will serve all clients within the Community and Workforce Development Department, not just those enrolled in workforce development programs, Pima County is not requesting the entire equipment costs. The cost basis toward the grant for the IT systems budget request was apportioned through the following method. Pima County calculated its percentage of WIOA participants by dividing WIOA clients by the total number of clients who received any service in the CWD Participant

Tracking System, as a two year average. So, the percentage of IT system equipment charged to the grant = 4398 WIOA participants / 16860 total participants = .26 or 26%. The Pima County Leveraged Resources contribution was calculated by multiplying the cost of each IT system by (100% - 26% = 74%), then adding each IT system portion cost.

| d. Equipment | Cost | CAREER % | CWD % | Leveraged | Grant Total |
|------------------------|--------------|-----------------|--------------|------------------|--------------------|
| CMS IT System | \$215,000.00 | 0.26 | 0.74 | \$159,100 | \$55,900 |
| CMS Year 2 | \$35,000.00 | 0.26 | 0.74 | \$25,900 | \$9,100 |
| Add-on 1 | \$35,000.00 | 0.26 | 0.74 | \$25,900 | \$9,100 |
| Add-on 2 | \$35,000.00 | 0.26 | 0.74 | \$25,900 | \$9,100 |
| Add-on 3 | \$35,000.00 | 0.26 | 0.74 | \$25,900 | \$9,100 |
| TOTAL EQUIPMENT | | | | \$262,700 | \$92,300 |

Contractual:

There are no Contractual costs for this grant.

Construction:

There are no Construction costs for this grant.

Other:

Amber Wells, Jennifer Eckstrom, and Marcelino Flores will use the New Horizons Learning Graphics Club membership to take training in eight different design and graphics software applications. Amber Wells and Dalila Perez will use the New Horizons Learning Tech Club memberships to take trainings from over 30 different web development, cyber security, and coding trainings. The Graphics Club membership costs \$1,895.00 per person. The Tech Club membership costs \$8,999.00 per person. The Other budget category total was calculated by adding each individual employee training membership cost.

| h. Other | Cost | Total |
|--|-------------------|-----------------|
| NHL Tech Club Training Membership, Wells | \$8,999.00 | \$8,999 |
| NHL Tech Club Training Membership, Perez | \$8,999.00 | \$8,999 |
| NHL Graphics Club Training Membership, Wells | \$1,895.00 | \$1,895 |
| NHL Graphics Club Training Membership, Flores | \$1,895.00 | \$1,895 |
| NHL Graphics Club Training Membership, Eckstrom | \$1,895.00 | \$1,895 |
| TOTAL OTHER | | \$23,683 |

Indirect Costs:

Pima County requests a 10% de minimis rate on Modified Total Direct Costs (MTDC). MTDC includes direct salaries and wages, applicable fringe benefits, materials and supplies, applicable supportive services, travel, and up to the first \$25,000 of each subaward (regardless of period of performance).

MTDC excludes equipment, capital expenditures, charges for patient care, participant support costs, and the portion of each subaward in excess of \$25,000. Indirect was calculated by multiplying each category base by the 10% de minimis rate, then adding the indirect category totals.

| Indirect Costs | | | |
|------------------------|-------------|---------------|---------------|
| MTDC | Base | Rate % | Total |
| Personnel | \$163,987 | 10 | 16,399 |
| Fringe Benefits | \$60,209 | 10 | 6,021 |
| Travel | \$517 | 10 | 52 |
| Other | \$23,683 | 10 | 2,368 |
| Total Indirect | | | 24,840 |

Total Costs:

Total Costs for the Pima County CAREER grant proposal were calculated as the sum of Personnel, Fringe Benefits, Travel, Equipment, Supplies, Contractual, Other, and Indirect Costs. Total Leveraged Resources are also shown in this table, but not included in the Total Costs calculation.

| Total Costs | Leverage | Total |
|------------------------------|------------------|------------------|
| Total Personnel | | \$163,987 |
| Total Fringe Benefits | | \$60,208 |
| Total Travel | | \$517 |
| Total Equipment | | \$92,300 |
| Total Other | | \$23,683 |
| Total Direct Charges | | \$248,397 |
| Total Leveraged Costs | \$262,700 | |
| Indirect Charges | | \$24,840 |
| CAREER Total | | \$365,535 |

Attachment D: Statement of Work

ATTACHMENT A

Comprehensive and Accessible Reemployment through Equitable Recovery (CAREER) National Dislocated Worker Grant Project Synopsis

*This synopsis **must** be completed and submitted along with other required application materials as described in Section 4.g of the CAREER DWG TEGL. If more space is required than the synopsis provides, please attach additional pages with that information clearly identified. ETA will not review any information in excess of five additional pages.*

Applications that do not include all the required information in this synopsis will be considered non-responsive and will not be reviewed.

| APPLICATION INFORMATION | |
|--|--|
| Instructions: Please complete all of the following elements in this table. | |
| Applicant Organization Name | Pima County, Community and Workforce Development Department (CWD) |
| Applicant Organization Type Select the appropriate type of eligible applicant. | <input type="checkbox"/> State or Outlying Area Workforce Agency (or consortium of states or outlying areas) |
| | <input checked="" type="checkbox"/> Local Workforce Development Board (WDB) or consortium of WDBs |
| | <input type="checkbox"/> An entity eligible for funding through the Indian and Native American program in WIOA Section 166(c) |
| | <input type="checkbox"/> Entities determined eligible by the Governor of the state involved (These entities must provide a letter from the Governor with application submission, as well as a letter from at least one WDB, as required in section 4.b.iii of the TEGL) |
| | <input type="checkbox"/> Entities demonstrating to the Secretary the capability to implement this grant (These entities must submit additional documentation supporting their eligibility, as well as additional letters of support/partnership, as required in section 4.b.ii of the TEGL.) |
| Number of Participants Projected to be Served | The Pima County CWD CAREER CMS will serve an estimated 778 participants in Year 1 and 972 participants in Year 2, 1,750 total Dislocated Workers. |
| Participant Eligibility Applicant acknowledges that the only eligible participants are dislocated workers as described in Section 4.b.iii of the TEGL. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Priority Participant Population(s) Describe those populations | <input checked="" type="checkbox"/> Individuals from historically-marginalized communities or groups Why chosen: |

| | |
|---|--|
| <p>of eligible dislocated workers you intend to serve, and why such groups were</p> | <p>Pima County will serve the Priority Participant Population of public library patrons. Historically, this is a marginalized and underserved population which often does not own computers, has limited or no internet service, and less knowledge of workforce development resources and training opportunities. The Pima County Public Library does not track patron demographics in adherence to strict privacy laws. However, the Library has data on how many times it has offered educational programs and the number of attendees for those programs. Some of the most prominent programs for times offered and attendance are: Public Health Nurse, Cooling Center, Snack and Meal Program, English Language, Computers and Technology, Job Help, GED, Business Program, and Citizenship. There are multiple additional programs which roll up into Adult Literacy and Workforce Development categories. For over 30 years the Pima County Public Library has an extensive track record of providing LGTBQ programming and outreach. However, many of these programs (like the LGTBQ Book Club) roll into larger categories like Adult Literacy and Adult Outreach. From these data we infer that significant proportions of library patrons are low-income, uninsured or underinsured, recent immigrants, minorities, under-resourced, and unemployed. These data also suggest that these priority population patrons actively work to improve theirs and their families' lives.</p> |
| <p>chosen.</p> | <p>X Individuals have been unemployed for an extended period of time or who have exhausted UI or other Pandemic Unemployment Insurance programs</p> <p>Why chosen:</p> <p>Pima County wants to use the virtual online format of its new CMS system to reach people who are not able to, or are hesitant to engage with a One-Stop Center in person. This includes people recovering from COVID with long term symptoms, people with underlying health concerns who are susceptible to the worst forms of COVID, and people who had to leave the workforce due to lack of childcare. Many in these populations have been unemployed for an extended period of time or have exhausted UI and other benefit programs. Not only will the CWD CMS be well positioned to engage these populations remotely, but WIOA case management and career counseling services and the CWD business services team will be able to assess, engage, and prepare these individuals for remote work and help them find customized job opportunities.</p> |

| | |
|--|--|
| | <p><input checked="" type="checkbox"/> Other eligible dislocated workers</p> <p>Why chosen: An essential aspect of the CAREER Program is to address COVID related economic distress. Simultaneously, the Department of Labor temporarily expanded its definition of a Dislocated Worker to anyone who had to leave work due to COVID. Thus, Pima County will serve anyone who has had to leave work due to COVID as a Dislocated Worker through this grant.</p> |
| <p>Project Service Area Describe the geographic areas to be served by the proposed grant. If all activities will be carried out statewide, indicate here. If some activities will be statewide and others in geographic regions, please include both options and list communities included.</p> | <p><input type="checkbox"/> Statewide</p> <p><input checked="" type="checkbox"/> Counties/Communities (list):</p> <p>The CWD CAREER Project Service Area is Pima County, Arizona. A large county in Southern Arizona, Pima encompasses urban and very rural regions (including the Tohono O’Odham Nation Reservation), and shares its southern border with Mexico. Pima County is a relatively poor county (14% poverty rate vs 10.5% for the US overall in 2019). In 2017 more than one third of Pima County households were cost-burdened; 17% were severely cost burdened. The Pima County Community and Workforce Development Department (CWD), the Pima County Workforce Investment Board (WIB), and ARIZONA@WORK Pima County partner with businesses, community organizations, economic entities, education and training institutions, faith-based groups, and neighboring counties to deliver workforce development services through common goals and measures of success. All grant activities will occur within Pima County. However, the Client Management System (CMS) will also connect users with federal resources like WIOA and state resources like American Job Centers and the Community Action Agency. The outreach plan for the CWD CMS will focus on the Pima County Public Library system. There are 27 public libraries in Pima County, both in urban and rural areas. Where there are gaps in public library coverage, CWD will perform outreach through the 13 community centers in Pima County, and has already identified the Robles Ranch and Picture Rocks Community Centers as strategic community center locations.</p> |

| | |
|---|---|
| <p>Rationale for Project Service Area Provide a brief (<i>approximately 250 words</i>) description of why the service area(s) for this proposed project were chosen, including how providing services in these areas will help address the goal of the CAREER DWG.</p> | <p>The CWD CAREER Project Service Area was determined based on multiple interconnected factors. The State of Arizona has the American Job Center (AJC) website and other counties have open source, home built CMS systems. However, these platforms lack thorough interoperability to connect clients beyond workforce development to departments and programs like the Community Action Agency. These systems lack modules for embedded referral systems between state agencies like the Department of Economic Security and Vocational Rehabilitation. Also, the state AJC system is a big wheel which turns slowly. Pima County requires a flexible system which it can steer toward Pima County's unique combination of cultural makeup, economic challenges, combination of rural and urban areas, and community resource network. Building a CMS system specifically for Pima County will enable Community and Workforce Development to tailor resources toward Pima County populations and meet the needs of local employers who pay sustainable wages. Pima County also plans to build this system to focus on its priorities of equity, of reaching more people in need, and reaching underserved populations which require creativity and new service methods.</p> |
| <p>Consent to Submitting Performance Data Commitment to ensuring ability to submit performance data through WIPS as required in Section 4.g of the TEGL.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> |

| | |
|---|--|
| <p>Performance Reporting As described in section 4.j. of the TEGL, applicants must indicate the performance outcomes they intend to achieve in their proposed project.</p> | <p>Planned Employment Rate (2nd Quarter after Exit) (e.g. 75%): 75.6%</p> <p>Planned Employment Rate (4th Quarter after Exit) (e.g. 75%): 71.0%</p> <p>Planned Median Earnings (per quarter earnings rate, after 2nd quarter after employment): \$7,917</p> <p>Planned Credential Rate: 65.9%</p> <p>Planned Measurable Skill Gains Rate: 55.0%</p> <p>Please see attached Pima Negotiated Performance Letter for confirmation and details.</p> |
| <p>Performance Outcomes Are the planned performance outcomes for the activities in this project the same as the applicable negotiated goals established for state or local formula Dislocated Worker Programs?</p> <p>Applicants who do not intend to use the state or local negotiated goals for the above measures must explain what goals they will use and why those goals will be used in lieu of the negotiated goals.</p> | <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No, please explain why</p> |

| Partnership with Public Workforce System Entities | | | |
|---|--|------------------------------------|------------------------------------|
| <p>Instructions: To ensure proper participant eligibility determinations as well as delivery of appropriate career, training, and supportive services, at least one local Workforce Development Board (WDB) or American Job Center (AJC), located in the area(s) proposed to be covered by the grant, must be a partner in the grant.</p> | | | |
| <p>Applicants must complete the table below and include at least one required partner, as described in Section</p> | | | |
| Required Partner Name | Entity Type (Local Workforce Development Board; AJC) | Geographic Area Covered by Partner | Partnership Letter Included? (Y/N) |
| Pima County Workforce Investment Board | Local Workforce Development Board | Pima County | Y |

Strategic Partners (Optional)

Instructions: Per section 4.c.ii.B of the TEGL, applicants may propose to organize and maintain strategic partnerships, as well as contractual arrangements where appropriate, with community organizations or other entities to develop targeted efforts aimed at identifying and enrolling eligible participants from priority communities. *These partnerships may help ensure grant success but are not required to be included in the application.*

| Partner Name | Partner Type (Employer/industry, education, economic development, community organization, etc) | Partner Role(s) In Proposed Project | Geographic Area Covered by Partner |
|--|---|--|---------------------------------------|
| Pima County Public Library | Education | Outreach to potential participants | Pima County |
| Pima County Natural Resources, Parks and Recreation Department | Education | Outreach to potential participants | Pima County |

Project Summary

Instructions: Per section 4.d.i, applicants must briefly describe their vision for how their proposed project will achieve the goal of the CAREER DWG, including which of the required and allowable activities they intend to carry out.

Pima County CWD proposes to create a digital client management system (CMS) to provide virtual and equitable access to its entire portfolio of programs and services. The Virtual CMS Platform will extend CWD’s ‘no wrong door’ philosophy for its training, supportive services, job readiness and placement, education, housing, rental and utility assistance programs. The Virtual CMS Platform is a collaboration between Pima County CWD, Information Technology Department (ITD), and Procurement Departments. The Pima County CWD CAREER CMS plan also includes three add-ons to expand CMS functionality. Activities for the CMS include research, procurement, implementation, testing and training, release and refinement. Activities for Add-Ons 1-3 will mirror the same activity progression as the CMS. Selection of the individual add-ons will occur after procuring the CMS system, when the CWD CAREER team can analyze the new system to determine and prioritize functionality gaps. The new CMS will expand Pima County’s outreach for its workforce development services (and all resources) by reaching populations in rural parts of Pima County and allowing minority, underserved, and pandemic health cautious populations to access our full suite of resources remotely. All Pima County workforce development resources and activities including WIOA, H1B One Workforce, HVRP, business development, education, eligible training provider (ETPL) list and related services, and job preparation will bolster the CMS project, but will not be formal grant activities. The CWD CAREER team will support the purchase and creation of the CMS through activities to develop strategic partnerships, and outreach to priority populations, and train staff to service the CMS, and pivot the CWD Department toward virtual online service delivery. CWD has already created strategic relationships with Pima County Public Library and the Pima County Natural Resources, Parks and Recreation Department as part of planning the CMS. Among all outreach activities, CWD will focus on public libraries and community centers to reach its Priority Participant Population; rural, minority and underserved populations such as the LGTBQ community. The multi-level training plan includes:-education, CTE training and apprenticeships through normal CWD workforce development (again, not part of the formal grant request); multiple trainings between IT system vendors, Pima County ITD, CWD staff, and library and community center staff in train-the-trainer fashion. The CWD CAREER staff will also undergo training to help service and customize the CMS. Please see attached Pima County CAREER Project Plan for schedule and relationship of activities. Please see the attached Pima County Personnel Role Chart to connect individual personnel from the Budget Narrative with project roles and CAREER grant activities.

| Grant Activities | |
|-------------------------------|---|
| Instructions: Applicants must | Brief Description of Activities (Approximately 250 words or fewer for |

| | |
|--|--|
| identify which of the required and allowable activities they intend to employ under the grant to achieve the goal of the program. | each element) |
| <p><i>The goal of the CAREER DWG is to help reemploy dislocated workers most affected by the economic and employment fallout from the COVID-19 pandemic, in particular those from historically-marginalized communities or groups, and those who have been unemployed for an extended period of time or who have exhausted UI or other Pandemic Unemployment Insurance programs.</i></p> | |
| <p>A. Required Grant Activities Applicants for CAREER DWG funds must commit to providing <i>at least one</i> of the following activities.</p> | |
| <p>X Provide career and training activities for participants, including staff-assisted career services and appropriate supportive services, focused on reemployment. See section 4.c.i.A for more information.</p> | <p>Pima County CAREER will facilitate career development and training through enrollment in WIOA, H1B One Workforce, and HVRP. Through remote enrollment in these programs, participants will gain access to intake, assessment, case management, IEP development, career planning, job placement, follow-up and supportive services to remove barriers to unsubsidized employment: child care, clothes, eyeglasses, relocation under some circumstances, tools, training, transportation assistance, needs-related payments, legal aid, books, certification and job related fees. Co-enrollment in community services programs will also unlock housing, rental, and utility assistance resources. CAREER CMS participants will be eligible for GED education through Pima County Las Artes and Title II partners, and aforementioned training programs. Training will follow the Career Pathways as identified in the 2020-2023 Local Workforce Development Area Plan (LWDAP) for Pima County. The plan focuses on marginalized populations and sustainable earnings to show that “higher skills equal increased competitiveness, more jobs and increased earnings power.” The Pima County WIB adopted specific career pathways for WIOA individualized career services to integrate progressive skill development levels: Basic Employment, Core Academic, Entry Competencies, and Advanced Competencies. Training at these levels is then applied to Demand Occupation categories and lists of occupations. This strategic thrust aligns with the Eligible Training Provider List (ETPL). Pima County and the WIB update both Demand Occupations and the ETPL when occupations or training providers meet predetermined criteria. The WIB is in the process of updating the LWDAP to include a Forbes list of skills needed to succeed in a post Coronavirus world.</p> |

| | |
|---|--|
| <p>X Research, purchase, build, or expand virtual technology applications or platforms for job search, career guidance, training, or other activities to expand the capacity of the workforce system to serve larger numbers of dislocated workers and job seekers, to ensure accessibility to services beyond the physical American Job Centers, and to ensure that service delivery will not be interrupted due to emergencies such as the COVID-19 pandemic. See section 4.c.i.B for examples and additional information.</p> | <p>Pima County CAREER centers around purchasing and fielding a new CMS, which will connect clients across Pima County to public workforce development, community services, and housing resources and programs, GED/HSE classes, business development resources, and state resources. The CMS will automate intake, connect clients with eligible resources more quickly, and create a virtual platform allowing clients to access job readiness and training resources from anywhere. The new CMS will replace a patchwork of older systems now in use, which suffer issues of interoperability, remote access, scale-ability, and limited to no client interface. Activities leading to the CAREER CMS will include: 1) Researching system needs by refining requirements, establishing use case scenarios, and establishing intra-program interfaces (this activity is underway and projects to be partially complete by grant start date); 2) Purchasing the CMS through the Pima County Procurement Department; 3) Rolling out and testing the CMS; and 4) Training CWD employees how to navigate and use the CMS. After rollout, CWD will then expand the CMS by purchasing three add-ons. The CWD team will research and choose add-ons dependent on the CMS purchase. Examples of add-ons under consideration are: mobile phone application, scheduler, chat bot, events calendar, voice recognition, and a learning management system. The activities for choosing and purchasing will include: 1) Identifying functionality gaps; 2) Researching features through requirement refinement and use case scenarios; 3) Purchasing the add-ons; 4) Integrating add-ons into the CMS; 5) Roll out and testing; and 6) Training CWD staff on the add-ons.</p> |
|---|--|

B. Allowable Grant Activities

Applicants may carry out other activities to support the project design and in order to achieve the goal of the CAREER DWG program. Please select any of the options below that will be included in the proposed project, and provide a brief description of how these activities enable the success of the project. For additional information on these allowable activities see section 4.c.ii of the TEG.

X Creating and executing focused **outreach campaigns** designed to reach priority populations and other potentially-eligible participants to ensure they are able to enroll in grant-funded activities.

Bringing workforce development resources to new populations through the new CMS relies on a proactive outreach strategy. Pima focuses on reaching persistently-underserved populations – residents of our large rural areas, the LGBTQ community, refugees, and others. CWD will conduct an outreach campaign through the Pima County Public Library system. In areas without local public libraries, CWD will work through local community centers in conjunction with the Natural Resources, Parks and Recreation Department. Library and community center patrons will access the CAREER CMS platform through public facing computers. Digital newsletters from these departments will highlight this new virtual resource. Staff will undergo training and retraining to help patrons navigate the CMS. The centers will display CMS promotional collateral like fliers and business cards. Where and when possible (post COVID restrictions), the sister departments will offer live programming classes on the CMS platform. Pima County CWD will also conduct outreach to advertise the new CMS and the resources it unlocks through its own social media platforms: Facebook and Nextdoor. CWD will work with Pima County communications to publicize the CMS on its official Twitter and Instagram accounts. CWD will use collateral developed for its library and community center campaign along with staff training to conduct outreach at traditional community partners who have computer centers and are subrecipients to Pima County on workforce development grant programs. These community organization partners include: Goodwill Industries of Southern Arizona, SER Jobs for Progress, PPEP, Tucson Youth Development, and other community-based organizations.

| | |
|--|--|
| <p>X Organizing and maintaining strategic partnerships, including contractual arrangements, with community organizations or other entities to identify and enroll eligible participants from target communities</p> | <p>Since the primary focus of Pima County’s CAREER program is to research, purchase, and implement a CMS enterprise IT system, accomplishing this will not require formal CAREER-specific partnerships with the extensive list of community organization service providers who help deliver CWD workforce development programs. Pima County Community and Workforce Development has initiated new strategic partnerships with two separate departments within Pima County, the Public Library and Natural Resources, Parks and Recreation Departments. CWD will conduct outreach for the new CMS through its own social media and through partner community organizations. However, the main focus of outreach activities will occur through the Pima County Public Library and the Pima County Natural Resources, Parks and Recreation Department. CWD will maintain these strategic partnerships with sister departments by aligning CAREER Dislocated Worker goals with key elements of each departments’ mission. For the Pima County Public Library that is connecting the public to information and resources while prioritizing underserved populations. For the Natural Resources, Parks and Recreation Department that is to strengthen communities by supporting families. CWD will conduct trainings and periodic re-trainings with each department to maintain these strategic relationships and keep the CMS resource fresh in library and community center staff’s minds.</p> |
| <p>X Carrying out other allowable activities that are intended to achieve the goal of the CAREER DWG</p> | <p>The Pima County Community and Workforce Development CAREER team will take a series of technical web and design trainings through the New Horizons Learning Group. NHE Learning offers a Graphics Club membership and a Tech Club membership. The Graphics Club membership gives participants access to training in multiple levels of: Acrobat, Captivate, Dreamweaver, Illustrator, InDesign, Photoshop, Power Point, Publisher, and HTMLS. Tech Club membership gives open access to training in: AWS, Azure, Business Analysis, CISA, CSM, CISSP, CRISC, Cisco CCNA, CompTIA, Cybersec 1st, Responder, DevOps Foundation, Data Analytics, Exchange Server, HTMLS, ITIL4 Foundation, Java, Lean Six Sigma, Linux Admin, Microsoft 365, Office 365 Admin, Oracle, PowerApps, Power Automate, PowerShell, Project Management, Python, SharePoint, SQL Server, Teams, Visual Studio.NET, Windows 10, and Windows Server. This training will prepare the CWD CAREER CMS team to build, expand, and customize the new CMS platform. Gaining this knowhow and expertise through the Graphics and Tech Club trainings will also help the Community and Workforce Development Departments change its service model to meet clients where they are comfortable to engage with its resources. This training and the new CMS system are part of a larger CWD goal to evolve from solving only the challenges presented by those who walk through its doors to becoming a node in a virtual network to reach new and more people and apply resources in ever more flexible and effective ways.</p> |

C. Achieving the CAREER DWG Goal

The applicant must demonstrate that its project will help move its workforce toward high-quality family sustaining-wage employment opportunities and address the economic and workforce challenges caused or exacerbated by the COVID-19 pandemic. To address these challenges, applicants must briefly (in approximately 250 words or less) identify and describe how the strategies or approaches described above will help to achieve the goal of the CAREER DWG as described in section 4.a of the TEGL.

The Pima County WIB has recently focused on increasing labor-force participation. This hard-to-measure problem worsened during the Coronavirus pandemic. Ironically, Pima County's recovery is now threatened by workforce shortages. The CWD CAREER CMS project will reach and engage new segments of Pima County's population to move our workforce toward family-sustaining wage employment opportunities through multiple outcomes. The new CMS platform will introduce more Dislocated Workers and more overall Pima County residents to the full suite of Pima County One-Stop programs and services, reaching beyond the limits of traditional outreach methods and outdated CMS. This platform will spur more enrollments in successful CWD workforce development programs like WIOA, HVRP, and One Workforce, with established results delivering resources and training that lead to employment. Please see the attached Pima Adjusted Performance Letter for recent annual WIOA success. This platform will connect more participants to the ETPL resource which evolves with in-demand jobs and eligible training partners to create high-quality career paths. The CAREER CMS Outreach plan will educate library patrons about this system and connect them to CWD workforce development resources, especially Priority Participant Population patrons. CMS virtual online access will engage with people from our target populations who may have not wanted to visit a One-Stop Center in person and never benefited from CWD resources in the past, despite being in need. Training and retraining library and community center staff will keep the CMS resource fresh on their minds when patrons show the need for workforce development services.



DEPARTMENT OF ECONOMIC SECURITY
Your Partner For A Stronger Arizona

Douglas A. Ducey
Governor

Michael Wisehart
Director

July 21st, 2021

Supervisor Sharon Bronson
Board Chair
Pima County Board of Supervisors
130 W Congress St 11th FL

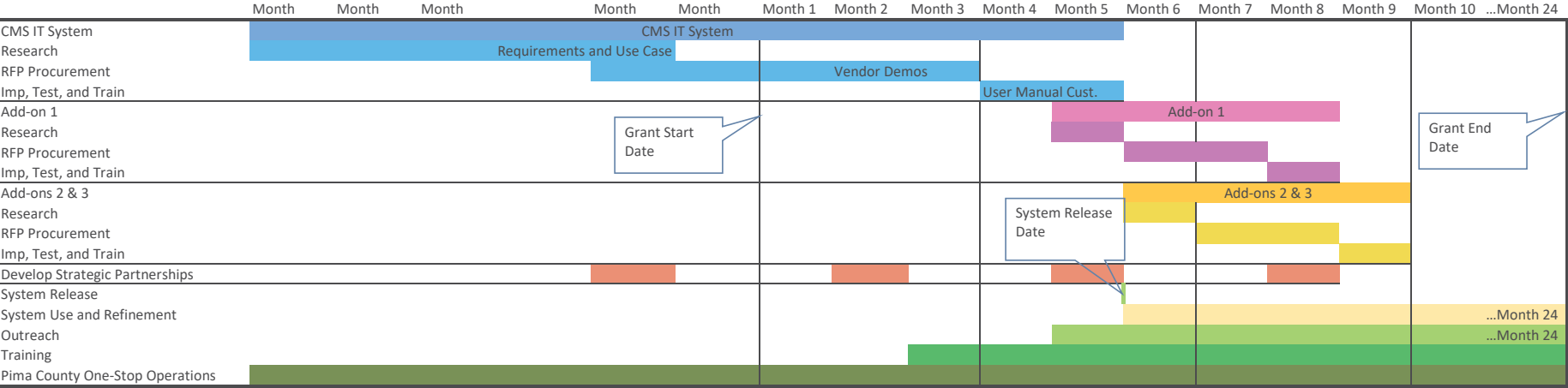
Dear Supervisor Bronson:

The following are the Workforce Innovation and Opportunity Act Title I-B Negotiated Performance Levels for Program Years 2020 and 2021 agreed-upon by the State and representatives of the Pima Workforce Development Board. Please note that the final negotiated target for PY21 Measurable Skills Gain was revised to reflect the required renegotiation earlier this year.

| | Final Negotiated Targets for PY20 | Final Negotiated Targets for PY21 |
|---|--------------------------------------|--------------------------------------|
| Adult | | |
| Employment 2 nd Quarter after exit | 68.0% | 68.0% |
| Employment 4th Quarter after exit | 67.0% | 67.0% |
| Median Earnings in the 2 nd quarter after exit | \$5,693 | \$5,693 |
| Credential attainment rate | 68.9% | 68.9% |
| Measurable Skills Gain | 59.2% | 58.2% |
| Dislocated Worker | | |
| Employment 2 nd Quarter after exit | 75.6% | 75.6% |
| Employment 4th Quarter after exit | 71.0% | 71.0% |
| Median Earnings in the 2 nd quarter after exit | \$7,917 | \$7,917 |
| Credential attainment rate | 65.9% | 65.9% |
| Measurable Skills Gain | 50.0% | 55.0% |
| Youth | | |
| Employment 2 nd Quarter after exit | 68.0% | 68.0% |
| Employment 4th Quarter after exit | 66.8% | 66.8% |
| Median Earnings in the 2 nd quarter after exit | \$4,450 | \$4,450 |
| Credential attainment rate | 52.0% | 52.0% |
| Measurable Skills Gain | 52.8% | 52.8% |

If you have any questions, please contact Rachael Tashbook, WIOA Project Specialist at RTashbook@azdes.gov or (480)466-4140.

Pima County
CAREER Project Plan



The Pima County CAREER Project Plan shows relationships between and estimated timing of required activities to design, purchase, and field a new Client Management System; allowable activites to conduct outreach, maintain strategic partnerships, conduct trainings; and continue related non-grant funded Pima County OneStop workforce development and community services.

Pima County

CAREER Personnel Role Chart

This chart describes CAREER personnel and external departmental partner roles on the new CMS system design and deployment project, and translates those roles to required and/or allowable activities within the CAREER grant.

| CAREER Personnel | CMS Project Role | CAREER Required Activities | CAREER Allowable Activities |
|-------------------------|---|---|--|
| Amber Wells | Project management, platform design, Training Lead | Project planning, CMS research, add on research, CWD dept. training, | Train strategic partners, design collateral, write marketing communications, maintain strategic partnerships |
| Marcelino Flores | Project coordination, communication lead | CMS research, add on research, project coordination | Maintain strategic partnerships, maintain relationships with community organization partners |
| Jennifer Eckstrom | Outreach coordinator | No role in required activities. | Faith based community outreach, social media outreach, community organization partner training |
| Dalila Perez | IT administrator | Coordinate between IT and CWD, CMS trouble shooting/platform roll out, graphics and collateral training to create marketing material and forms, coding training | No role in allowable activities |
| Marco Favela | IT support | Coordinate between IT and CWD, CMS trouble shooting/platform roll out, graphics and collateral training to create marketing material and forms, coding training | No role in allowable activities |
| Pima County ITD | System requirements and design lead, procurement consultation | CMS research, integrate CMS, add on research, add-on integration, testing, CWD dept. training | No role in allowable activities |
| Pima County Procurement | Procurement lead | Purchase CMS, purchase add-on | No role in allowable activities |



DEPARTMENT OF ECONOMIC SECURITY
Your Partner For A Stronger Arizona

Douglas A. Ducey
Governor

Michael Wisehart
Director

July 21st, 2021

Supervisor Sharon Bronson
Board Chair
Pima County Board of Supervisors
130 W Congress St 11th FL

Dear Supervisor Bronson:

The following are the Workforce Innovation and Opportunity Act Title I-B Adjusted Performance Factors and Levels for Program Year 2019 based on Arizona's Statistical Adjustment Model.

| | Negotiated Performance Level for PY19 | Adjustment Factor for PY19 | Adjusted Performance Level for PY19 | Actual Performance Level for PY19 | Percent of Goal Achieved for PY19 |
|---|---|----------------------------------|--|--|--|
| Adult | | | | | |
| Employment 2 nd Quarter after exit | 71.0% | 4.3% | 75.3% | 72.7% | 96.5% |
| Employment 4th Quarter after exit | 63.5% | 1.4% | 64.9% | 65.5% | 100.9% |
| Median Earnings in the 2 nd quarter after exit | \$5,350 | \$993 | \$6,343 | \$6,743 | 106.3% |
| Credential attainment rate | 53.5% | 7.7% | 61.2% | 77.6% | 126.8% |
| Measurable Skills Gain | Baseline | | | 38.3% | |
| Dislocated Worker | | | | | |
| Employment 2 nd Quarter after exit | 76.5% | 0.7% | 77.2% | 81.2% | 105.2% |
| Employment 4th Quarter after exit | 72.0% | -0.7% | 71.3% | 73.3% | 102.8% |
| Median Earnings in the 2 nd quarter after exit | \$6,500 | \$(194) | \$6,306 | \$8,465 | 134.2% |
| Credential attainment rate | 53.7% | 6.4% | 60.1% | 73.9% | 123.0% |
| Measurable Skills Gain | Baseline | | | 26.3% | |

| Youth | | | | | |
|---|----------|-------|-------|---------|--------|
| Employment 2 nd Quarter after exit | 63.0% | -0.5% | 62.5% | 74.8% | 119.7% |
| Employment 4th Quarter after exit | 63.0% | 1.1% | 64.1% | 73.9% | 115.3% |
| Median Earnings in the 2 nd quarter after exit | Baseline | | | \$5,116 | |
| Credential attainment rate | 44.5% | 1.7% | 46.2% | 66.3% | 143.5% |
| Measurable Skills Gain | Baseline | | | 60.0% | |

If you have any questions, please contact Rachael Tashbook, WIOA Project Specialist at RTashbook@azdes.gov or (480)466-4140.

Thank you for your continued efforts to improve employment outcomes for employers and job seekers in Pima County.

Sincerely,



Stacey Faulkner
WIOA Manager
Division of Employment and Rehabilitation Services
Department of Economic Security

cc:

Mark P. Vitale, MBA, Ph.D.
Local Workforce Development Board Chair
Pima Local Workforce Board
2797 E Ajo Wy
Tucson AZ 85713-6223

Anna M. Cunes
Pima Local Workforce Development Board Staff
Pima County Community Services,
Employment and Training
2797 E Ajo Wy
Tucson AZ 85713-6223

Cassie Lundin
Pima Local Workforce Development Board Staff



July 28, 2021

United State Department of Labor
Employment and Training Administration

To Whom This May Concern:

The Local Workforce Development Board in Pima County, Arizona is the Pima County Workforce Investment Board (WIB). The WIB provides oversight and accountability to the ARIZONA@WORK Pima County workforce development area under the Workforce Innovation and Opportunity Act (WIOA) of 2014. As designated by Arizona's Governor, the WIB provides local planning, program oversight, negotiating local performance accountability measures, selection of operators and providers, and approving a budget for WIOA Title I-B programmatic and service administration provided by Pima County's Department of Community and Workforce Development (CWD).

The WIB has reviewed the Pima County CAREER Grant, which features a project scope to:

- Purchase a new Client Management System as a virtual platform to host CWD's programs and services
- Acquire customization for that system (such as a mobile web application), and efforts related to researching, planning and system deployment.

The WIB feels strongly that this project will create a seamless digital platform for all CWD's clients and help reach potential clients who have been historically underserved by workforce development services.

Pima County Grants Management and Innovation is the fiscal agent for WIOA and the Pima County CWD department is the administrative entity for WIOA Title I-B programs and services provided in Pima County, governed by the independent, volunteer WIB of Pima County. Thus, Pima County CWD is eligible and was approved by the Pima County WIB Executive Committee on January 24, 2021 to apply for the US Department of Labor Employment and Training Administration Comprehensive and Accessible Reemployment through Equitable Employment Recovery (CAREER) grant on the WIB's its behalf.

Respectfully,

A handwritten signature in dark ink, appearing to read "Mark P. Vitale", is written over a faint, larger version of the same signature.

Mark P. Vitale, MBA, Ph.D.
Chair, Pima County Workforce Investment Board



August 13, 2021

United States Department of Labor
Employment and Training Administration
200 Constitution Ave NW
Washington, DC 20210

Dear Grant Administrator:

The Pima County Natural Resources, Parks and Recreation Department is pleased to collaborate with the Pima County Community and Workforce Development Department's (CWD) CAREER Dislocated Worker Program, TEGL 25-20. Through land preservation for public enjoyment, education, and providing community and recreation centers resources we strive to strengthen communities by improving the quality of life for all of our residents. Community and Workforce Development programs that help people reskill and find jobs fit nicely with our mission. CWD's plan to create an online platform to connect all of Pima County to its workforce development and family resources will be a great new resource for Natural Resources, Parks and Recreation community centers.

To promote both our and CWD's goals, the Pima County Natural Resources, Parks and Recreation Department commits to the following role in the CAREER Grant Program:

- Create a strategic partnership with CWD to help provide outreach for the new CWD Client Management System (CMS) online platform to public library patrons.
- Provide access to the CMS platform on public facing community center computers.
- Train community center staff to talk about this community resource and help patrons navigate this enterprise IT system.
- Add a feature about the CMS platform to the public Natural Resources, Parks and Recreation Department news release.
- Once in-person operations fully reopen post-pandemic, Natural Resources, Parks and Recreation will work with CWD to offer live programming classes on the CMS platform to all interested patrons.
- Display informational collateral about the CMS system in appropriate areas within our community centers.

In addition, Pima County Natural Resources, Parks and Recreation will fulfill these roles for the CAREER grant at no cost to the grant. We are able to leverage our resources and personnel to conduct outreach for the CMS platform because this grant program aligns with our mission to build healthy communities. Please reach out to me with any questions.

Respectfully,

A handwritten signature in black ink, appearing to read 'Joe Barr', followed by a long horizontal line extending to the right.

Joe Barr

Recreation Division Manager

Pima County Natural Resources, Parks and Recreation



PIMA COUNTY PUBLIC LIBRARY

Administrative Offices
101 N Stone Avenue
Tucson, AZ 85701

520.594.5600
www.library.pima.gov

United States Department of Labor
Employment and Training Administration

To Whom it May Concern,

The Pima County Public Library is pleased to collaborate with the Pima County Community and Workforce Development Department's (CWD) CAREER Dislocated Worker Program, TEGL 25-20. We are committed to connecting the public to information and resources while creating opportunities for public education. The Pima County Public Library provides collections, programming, space and technology our community needs. CWD's plan to create an online platform to connect all of Pima County to its workforce development and family resources dovetails with our mission. Likewise, the CAREER requirement to prioritize underserved populations furthers our goal to honor diversity in our unique Southern Arizona community.

To promote both the Library's and CWD's mission and goals, the Pima County Public Library commits to the following role in the CAREER Grant Program:

- Create a strategic partnership with CWD to help provide outreach for the new CWD Client Management System (CMS) online platform to public library patrons.
- Provide access to the CMS platform on public facing library computers.
- Train library staff to talk about this community resource and help patrons navigate this enterprise IT system.
- Add a feature about the CMS platform to the public library news release email listserve, called Savannah.
- Once in-person operations fully reopen post-pandemic, the Library will work with CWD to offer live programming classes on the CMS platform to all interested patrons.
- Display informational collateral about the CMS system in appropriate areas within our libraries.

In addition, Pima County Public Libraries will fulfill these roles for the CAREER grant at no cost to the grant. We are able to leverage our resources and personnel to conduct outreach for the CMS platform because this grant program aligns with our mission to provide community resources and reach underserved groups within our community. Please reach out to me with any questions.

Amber D. Mathewson
Library Director

Attachment E:
Negotiated Indirect Cost Rate Agreement



July 30, 2021

Suzan G LeVine
Principal Deputy Assistant Secretary
US Department of Labor, Employment and Training Administration
200 Constitution Ave NW
Washington, DC
20210

Subject: TEGL 25-20, Comprehensive and Accessible Reemployment through Equitable
Employment Recovery Indirect Cost Certification

Dear Ms. LeVine:

Pima County Community and Workforce Development Department (CWD) does not have a Negotiated Indirect Cost Rate Agreement with a Federal Cognizant Agency, nor does it receive \$35M in Federal direct funds. Pima County has never had a Negotiated Indirect Cost Rate Agreement for any of its departments. Since Pima County CWD does not have a federally approved indirect cost rate, Pima County CWD requests the de minimis indirect cost rate of 10% to recover allowable indirect costs on grants and cooperative agreements.

As per 2 CFR 200.1 Pima County will use Modified Total Direct Costs as its cost allocation base. The Pima County Budget Narrative provides explanations of this cost base and detailed indirect cost calculations.

Please contact me if I can provide any additional information or clarification on this matter.

Sincerely,

A handwritten signature in blue ink that reads "Amy Fish". The signature is fluid and cursive, with the first name "Amy" and last name "Fish" clearly distinguishable.

Amy Fish, Deputy Director
Pima County Grants Management and Innovation

Regina Kelly, Director

130 W Congress St., Third Floor, Tucson, Arizona 85701 • Phone: 520-724-6679