

Department of Labor-ETA

Reentry Projects

Compliance Refresher

JUNE 19, 2018

LISC FAMILY INCOME AND WEALTH BUILDING

Housekeeping

- This webinar is being recorded
- All lines have been muted to reduce background noise
- If you have questions during the presentation, please type them in the chat box
- Copy of the slide deck will be available on our FOC website (<http://www.FOC-Network.com/>)

Agenda

Time	Category	Topic
2p EST	Program Compliance	Participant Eligibility & Files
		Training Requirements
		Compliance Monitoring
		Reporting & Salesforce
2:30pm EST	Fiscal Compliance	Cost Allowability
		Cost Allocation
		Procurement Process
		Indirect Cost Rate
		Reporting
3:15pm EST	Q & A	Questions & Wrap Up

Participant Eligibility

Use the **Eligibility Checklist** for ALL participants going forward – and previous enrollments – before adding participant to REO Intake in Salesforce!

Participant Eligibility – Key Items

1. Adults ages 25+ that have:
 - Been released from incarceration/jail settings within 180 days OR
 - Currently under supervision (i.e. confined in a correctional facility with release date within 6-months, residing in a residential reentry center, on electronic monitoring or home-based monitoring, or enrolled in a jail-based work release center)
2. Selective Service registration
3. Must reside within approved census tract at time of enrollment
4. Must sign authorization and release forms

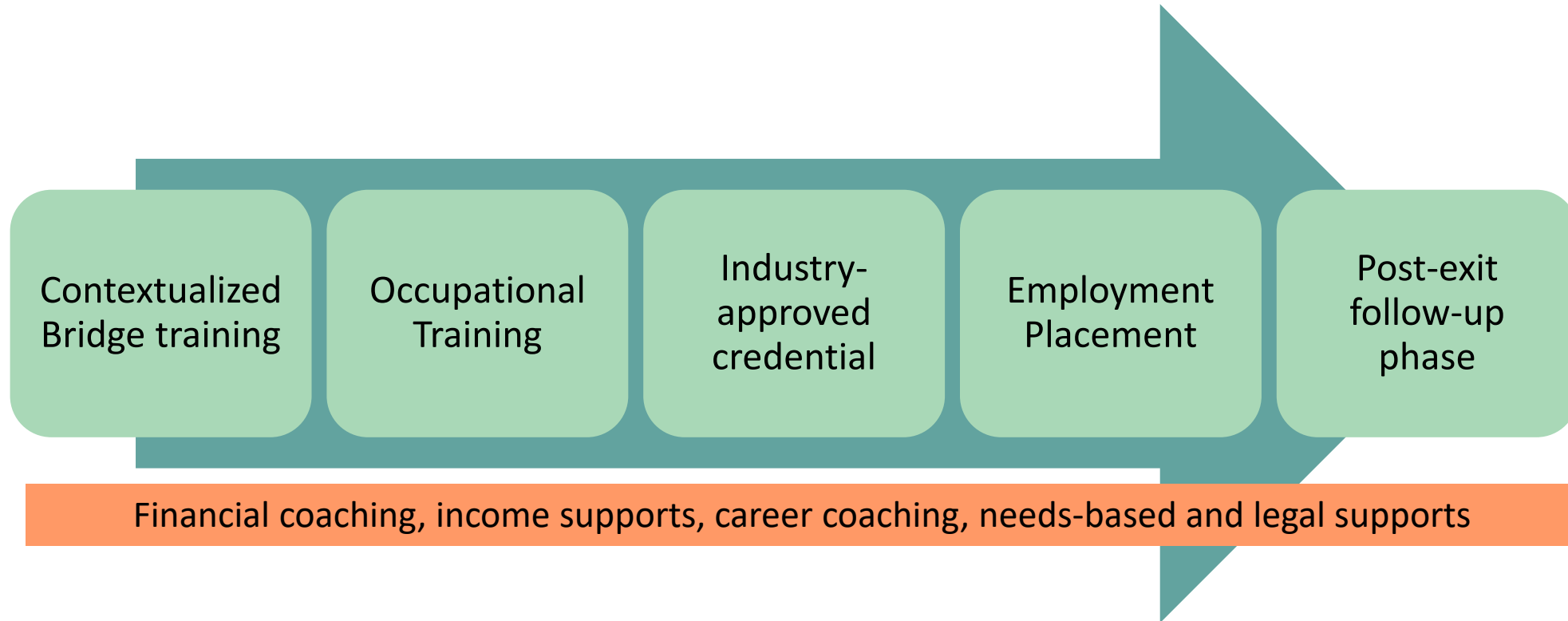
Eligibility requirements
and templates available:

<http://www.foc-network.org/dol-reentry.html>

Additional Intake Requirements

1. Career Development Plan: ***Include credential plans on all CDPs (can include high school equivalency)***
2. TABE or equivalent: Required at beginning of program. Those who test out of Bridge can move straight to occupational training, but those who test into Bridge must be re-TABEd post-Bridge ***Be sure to enter post-TABE skills gain into Salesforce***
3. Risk Needs Assessment: Required for candidates deemed high-risk due to history of violent offenses ***ORAS training late summer***
4. Combined Financial Assessment: Baseline budget and credit score ***Update "latest" in Salesforce every 6 months or when there is a change in income***

Training Component Requirements



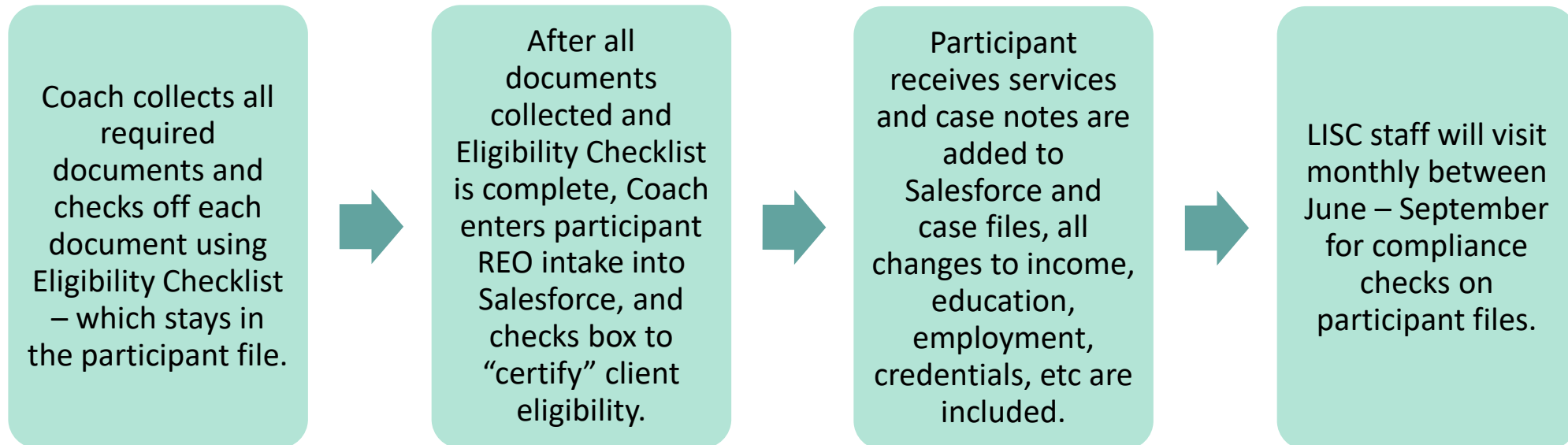
Program Exits

- Positive Exits
 - Met big Career Development Goal
 - Obtained employment
 - Obtained educational milestone: GED, started college/school
 - Graduated program

- Negative Exits
 - Re-incarceration
 - Loss of contact and no services in 90 days*
 - Dismissed from program
 - Discovery of ineligibility



Compliance Monitoring



Program Reporting & Compliance Deadlines



Report/Data	Submit To	Format	Deadline	Example
Monthly Client Data	Salesforce	Salesforce data	10 days following month end	July 10 th for June
Monthly Workplan Activity Report	Your LISC PO	Excel	Set by PO	July 10 th for June
Monthly Compliance Monitoring	Your LISC PO	Site visit	Set by PO	2nd Tuesday of the month
Quarterly Narrative Progress Report	Your LISC PO	Word	Last day of month following quarter end	July 31 st for May - June

Questions on Program Compliance?

Fiscal Compliance

Cost Allowability

Allowable Costs

- Direct Salaries and Fringe
- Travel
- Program costs
- Program supplies
- Consultants-to be hired
- Direct program operating costs
- Indirect costs through an approved rate or the *de minimis* rate of 10%

Unallowable Costs

- Purchase of equipment with a unit cost of more than \$5,000 even if grant only pays for a portion
- Depreciation
- Pre-identified consultants if there is no competitive selection documentation on file
- Fines and Penalties



COST ALLOCATION

Measure of “Benefit Received”

- Is the cost essential to get the participants in the grant trained or employed?
- Participant Focused
- Outcome Focused
- Documented



Salary & Benefits

Salary may not exceed \$187,000/year (Executive Level II)

Time charged must be based on actual time spent

Benefits such as health care, Paid Time Off and retirement contributions are allowed if

- They are included in the organizations policies
- They are applied consistently to all employees

Timesheets must be used to track actual time spent:

- They must be signed by the employee and supervisor
- Must be done after the fact and completed once per month
- Need to be tracked by hours and reflect all time spent

<https://www.gpo.gov/fdsys/granule/CFR-2014-title2-vol1/CFR-2014-title2-vol1-sec200-430>

Travel

Must be included in your budget

Fly America - use U.S. air carrier service for all air travel and cargo transportation services

Must use the mileage rates approved by GSA www.gsa.gov/mileage

Documentation:

- All invoices for travel including mileage logs (automobile), gas receipts, used airline or train ticket(s), and any other documents pertaining to the purpose of the trip.
- All detailed receipts/invoices for per diem expenses, canceled checks, or any other method of payment including credit cards.



Procurement Process

Proposed Scope of Work: *The scope of work should be as specific as possible to ensure that consultants will understand and be held to achieving the deliverables described in this section.*

Term of Contract: *Expected start and end date of the services.*

Strategic Importance: *Description of the need for engaging a consultant to perform the proposed scope of work.*

Competitive Selection Process: *Organizations should follow their policies and procedures for procuring services with government funds. The objective of procurement, particularly with federal funds, is to promote free and open competition. Organizations should make opportunities available to a wide range of vendors and make decisions that are most advantageous to them. Each procurement action should have documentation documenting the process.*

Description of the process. *Methods used to make the opportunity available to potential vendors, i.e: RFQ, review of written proposals.*

Cost Price Analysis. *Price Analysis to demonstrate it is fair and reasonable in the light of the work to be performed. This analysis can include a comparison of proposals, price quotations, market prices, etc together with discounts.*



Consultants

Must complete & document competitive selection

www.Sam.gov check

Consultants may not be paid more than \$710 per day



Financial Reporting Requirements

Department of Labor-ETA

Organization Name: Breakthrough-Test		Grant PA#: 45072-0001	Prepared By: Jackie G.		
Address: 123 May Street Chicago , IL		Grant Period: 9/1/2017-08/30/2018	Contact Person: Jackie G.		
		Period Reporting On: June 2018	Phone Number: 555-545-1234		
Budget Description	Total Approved Budget	Total Previously Reported Expenses	Current Month's Expenses	Cumulative Total Expenses	Budget Balance
Salary (List each position title and employee name)				\$ -	\$ -
Jackie Fake, Employment Specialist	\$ 52,180.00		\$ 9,587.00	\$ 9,587.00	\$ 42,593.00
A. Jones; Director of Training	\$ 13,697.00		\$ 2,042.00	\$ 2,042.00	\$ 11,655.00
				\$ -	\$ -
Travel	\$ 500.00		\$ 20.00	\$ 20.00	\$ 480.00
Supplies	\$ 1,000.00		\$ 300.00	\$ 300.00	\$ 700.00
Consultants				\$ -	\$ -
Program Costs	\$ 23,500.00		\$ 2,000.00	\$ 2,000.00	\$ 21,500.00
Other Direct Costs	\$ 700.00		\$ 20.00	\$ 20.00	\$ 680.00
Indirect Costs (if included in your approved budget)	\$ 9,157.70		\$ 1,396.90	\$ 1,396.90	\$ 7,760.80
GRAND TOTAL	\$ 100,734.70	\$ 0.00	\$ 15,365.90	\$ 15,365.90	\$ 85,368.80

MAIL TO: YOUR LISC PROGRAM OFFICER

I certify that the expenditures reported are CORRECT and APPROPRIATE and COPIES of all DOCUMENTATION (invoices, cancelled checks, consultants agreements, etc.) are on file.

Signed: _____

Date: _____

*Please sign and date this report.

**REMINDER - The report is due by the 15th of the month.



Financial Reporting Requirements

Indirect Calculation Sheet

Organization Name
PA #

*Only sites who are using the de minimis rate, and that have NEVER had a NICRA, should complete this form.

Detailed Cost Description	Amount
Salaries and Fringe	\$ 11,629.00
Travel	\$ 20.00
Supplies	\$ 300.00
Program Cost	
Books and uniforms	\$ 1,700.00
credit checks	\$ 300.00
Other direct costs	
Phones	\$ 20.00
Total	13969

De Minimis Calculation	1396.9
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Directions

Please list all expenses that are included in your modified total direct cost base on each line in the table above. The de minimis rate will calculate automatically at 10%, and it must exclude any participant support costs from your calculation.

Salaries and wages, fringe benefits, materials and program supplies, consultant services and staff travel are included in the MTDC. Equipment, capital expenditures, charges for patient care, tuition remission, rental costs, scholarships and fellowships, participant support costs, and the portion of each sub award in excess of \$25,000 are not included in the MTDC. (2 CFR 200.68)

2 CFR 200.75 Participant Support Cost means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.



Indirect Costs-De Minimis Cost Rate

De Minimis is calculated as 10% of total Modified Total Direct Costs (MTDC)

INCLUDED in MTDC calculation	EXCLUDED from MTDC calculation
Salaries and Wages	Equipment
Fringe Benefits	Capital Expenditure
Program Supplies	Participant support costs
Consultant Services	Tuition remission, scholarships, fellowships
Travel	Rental costs



De Minimis- 10% MTDC

Budget Line Item	Amount
Salaries & Fringe Benefits (positions on approved budget)	\$20,000
Participant Stipends	\$2,000
Rent	\$5,000
Indirect Costs (de minimis rate)*	\$2,000
Total Budget	\$29,000

***The indirect costs above are calculated based on the MTDC of \$20,000 (salaries and fringe), which excludes the participant support costs (or stipends) of \$2,000 and rent of \$5,000.**



Questions?
