



DoL – Reentry Compliance

AUGUST 18, 2017

Agenda

Reporting Schedule

General Compliance

Cost Allowability

Client Enrollment



Reporting Schedule

Financial reports are due on the 15th of the following month

Narrative reports are due quarterly within 30 days of the end of the reporting quarter. Reporting quarter end dates are March 31, June 30, September 30, and December 31

Payments based on financial reports and number of clients served



General Compliance

Budget flexibility between existing cost categories is allowed up to 10% of the total budget. Anything in excess of 10% must receive prior written approval. New line items require prior written approval.

Monitoring visits will be conducted annually and each organization will receive a risk level

Record Retention: All records must be saved for 3 years after LISC submits the final financial report unless otherwise notified **or** there is pending litigation **or** there is pending audit.



Risk Level

High Risk Monitoring Plan:

- frequent interaction with grantee staff one or more of the following: weekly conference calls;
- requirements to produce complete source documentation on a monthly basis;
- detailed reviews of forms, policies, and procedures;
- mandatory participation in targeted training or technical assistance; and other activities as deemed appropriate by grantee staff.
- Site Visits: two (2) in-person or remote site visits to High Risk programs per year.

Medium Risk Monitoring Plan:

- bi-weekly or monthly interactions with grantee staff, decreasing in frequency as the program demonstrates knowledge and compliance.
- interactions may include regular conference calls; submission of summary documentation (e.g., general ledger reports to support invoices) and participation in training or technical assistance.

Low Risk monitoring Plan:

- standard reporting processes
- annual site visits



Cost Allowability



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>

Time Allocation Sheet

EMPLOYEE: Arthur Dent

POSITION: Program Manager

BI-WEEKLY PAY PERIOD: FROM: 11/19/2011 TO: 12/2/2011

Pay Period Days	LISC Grant A	WIA Grant B	Hutton Grant C	Unrestricted	Holiday or Annual Leave	TOTAL HOURS
19						0
20						0
21		2	4	3		9
22		2	3	4		9
23		2	3	4		9
24					9	9
25					8	8
26						0
27						0
28	3	3		3		9
29	2	4		3		9
30	2	3		4		9
1		2		7		9
2						0
Hourly Totals	7	18	10	28	17	80

Staff Signature: A. Dent Signature Date: 11/15/12

Supervisor Signature: F. Perfect Signature Date: 11/15/12



Red Flags & Common Problems

Time is recorded based on budget

Timesheet \neq General Ledger

Timesheets not signed by employee & supervisor

Same number of hours in all timesheets

Time in – Time out reports



LISC

Consultants

Must complete & document competitive selection

www.Sam.gov check

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



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.*



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.



Equipment

NOT ALLOWED ON THIS GRANT

Includes anything purchased that exceeds a unit cost of \$5000 and a useful life of one year or more

Cannot pay for a part of the cost



De Minimis

Must be applied consistently to all awards

Calculated as 10% of Modified Total Direct Costs (MTDC)

MTDC includes salaries and wages, fringe benefits, materials and program supplies, consultant services and staff travel

MTDC **does not** include equipment, capital expenditures, charges for patient care, tuition remission, rental costs, scholarships and fellowships and participant support costs

Participant support costs 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.



Client Enrollment



Target Population - Reentry

Adults age 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)

Persons convicted of sex crimes are not eligible for funding

Persons deemed high-risk (history of violent offenses) require risk assessment.

Priority of service must be given to Veterans or eligible spouses



Client Files- WIOA Requirements

Selective Service:

- Men born on/after Jan 1, 1960 need to be registered for Selective Service (printout needs to go in file).
- If incarcerated during registration age (18-24), can submit an appeal
- <https://www.sss.gov/Home/Verification>

Work Eligibility:

Documentation that establishes identity and work eligibility needs to be photocopied in file. Form i-9 acceptable documents: <https://www.sss.gov/Home/Verification>

Support Services:

All support services need to be case-noted with copies of receipts/disbursement information in client file

Client Files

All information must be tracked in Salesforce

Paper files must also be kept for additional paperwork

- Files must be kept in a secure/locked location
- All Personally Identifiable Information must be protected

More guidance forthcoming on additional measures (tennessen agreements, employment plans, etc.) as we continue to build out Salesforce fields.

Questions?

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