



SEP 26 2014

VETERANS' PROGRAM LETTER NO. 09-14

MEMORANDUM FOR: ALL VETERANS' EMPLOYMENT AND TRAINING
SERVICE COMPETITIVE GRANT RECIPIENTS

FROM:

KEITH KELLY

A handwritten signature in blue ink, appearing to read "Keith Kelly".

SUBJECT:

Competitive Grants Quarterly Reporting Guidance

- I. **Purpose:** To provide guidance on submission of quarterly fiscal and performance reports for all Veterans' Employment and Training Service (VETS) competitive grantees.
- II. **References:** Workforce Investment Act Section 168; Title 38 U. S. Code Sections 2021 and 2023; 29 CFR, Part 95, Grants and Agreements with Institutions of Higher Education, Hospitals and Non-profit Organizations; 29 CFR, Part 97 (A-102), Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments; A-21, Cost Principles for Educational Institutions, http://whitehouse.gov/omb/circulars_default; A-87, Cost Principles for State, Local, and Indian Tribal Governments; A-122, Cost Principles for Non-Profit Organizations; and the Special Grant Provisions issued with the Notice of Obligation and Notice of Award.
- III. This VPL supersedes and rescinds VPL 02-12, dated November 30, 2011.
- IV. **Background:** VETS competitive grantees are required to submit quarterly fiscal and performance reports to comply with the reporting requirements of the grant to facilitate grant oversight responsibilities of VETS' Grant Officer Technical Representatives (GOTR). VETS monitors reports submitted by the grantee to ensure funds are expended in accordance with cost principles established for Federal awards and determines if performance is within the planned goals. In order to meet the reporting requirements grantees are required to have access to the Department of Labor's Grantee Reporting System (GRS), for submission of the Standard Form (SF) 425, Federal Financial Report (referred to as the FFR throughout this VPL), and access to the VETS Operations and Programs Activity Report (VOPAR) for submission of performance reports. **Any**

grantee that does not have access to either of these two reporting portals should contact the appropriate Grant Officer's Technical Representative (GOTR) as soon as possible.

- V. **Grant Administration:** The State Director for Veterans' Employment and Training (DVET) serves as the GOTR. While the DVET may designate some duties to other VETS staff in the performance of grant monitoring and oversight, the DVET, as the GOTR, has ultimate responsibility for the management of competitive grants.

The GOTR will recommend approval or disapproval to the Regional Administrator for Veterans' Employment and Training (RAVET) for the following:

- A. Technical changes not involving a change in the scope, cost, or conditions of the grant award agreement;
- B. Quarterly Technical Performance and Financial Status Reports;
- C. Corrective Action Plans; and
- D. Certain budget line item deviations requested by the grantee up to the limit specified in the Special Grant Provisions.

NOTE: The RAVET is responsible for the final approval once the GOTR has provided his/her recommendation.

VI. **Reporting Requirements:**

- A. The grantee must submit certified electronic quarterly fiscal and performance reports via GRS http://www.etaareports.doleta.gov/cfdocs/grantee_prod/reporting and VOPAR <https://vopar.doleta.gov/>. Fiscal reports are due no later than 30 calendar days after the end of each quarter. Complete and accurate performance reports are due the last day of the month, following the ending date of each quarter during the active performance period:

- 1st Quarter by October 31st;
- 2nd Quarter by January 31st;
- 3rd Quarter by April 30th;
- 4th Quarter by July 31st;

As well as for the follow-up performance period:

- 5th Quarter by October 31st;
- 6th Quarter by January 31st;
- 7th Quarter (Final) by April 30th;
- FFR Closeout within 90 days of certifying a final FFR.

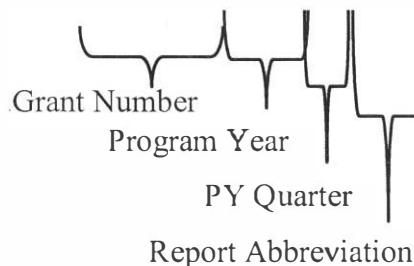
NOTE: Early quarterly report submissions are strongly encouraged so that needed corrections can be identified and made in time for the reports to be certified by the required due date.

- B. All pages of the reporting documents submitted by grantees must include the appropriate grant number.
- C. Between scheduled reporting dates, grantees will immediately inform the GOTR of any significant developments affecting their ability to submit timely quarterly reports. GOTRs will provide grantees with the necessary technical assistance to address issues.

Grantees must submit a justification to the GOTR regarding any proposed changes to previously reported performance data in VOPAR. If approved, the applicable quarters of the grant period will be reopened for correction. Once the grantee finalizes the data, VETS will review the revised performance data, resolve any discrepancies and approve the data in VOPAR within one week.

VII. Report Content and Submission: All components of the competitive grant quarterly reports are submitted electronically into either the Department of Labor’s GRS reporting system or the VOPAR reporting system. Submissions to the VOPAR system require data entry or attachment of documents as described below. All documents submitted to VOPAR will be saved following a standard naming convention illustrated in the table below using a fictitious PY 2011 grant awarded as grant number HV-12345-11-60-5-12. Only one document per program year and quarter will be accepted for the documents listed below. Any corrected document uploaded will replace the previously uploaded document of the same type.

File Type	File Name	Format
Technical Performance Report	HV-12345 PY11 Q1 TPR.xls	MS-Excel
Technical Performance Narrative	HV-12345 PY11 Q1 TPN.doc	MS-Word ¹
Corrective Action Plan	HV-12345 PY11 Q1 CAP.doc	MS-Word ¹
Success Stories	HV-12345 PY11 Q1 SS.doc	MS-Word ¹



¹ Pdfs are acceptable.

- A. Financial Reports: The FFR can be saved in the GRS but will not be submitted for acceptance by the GOTR until it is certified in the system by the grantee. All financial information must be submitted utilizing the electronic FFR via the GRS no later than 30 days after the end of each program year quarter at: http://www.eta-reports.doleta.gov/cfdocs/grantee_prod/reporting. Separate FFRs must be submitted for each grant year and identify appropriate financial information for the grant year reported.
- B. Closeout FFR: A closeout FFR must be submitted by the grantee no later than 90 days after the period of performance.
- C. Quarterly Performance and Expenditure Data: Grantees must enter quarterly data for each grant year utilizing the VOPAR system web site at <https://vopar.doleta.gov>, using the “Enter/Edit Actuals” link. The data to be entered comes directly from the “VOPAR Reporting” and “VOPAR Demographics Summary” worksheets of the Technical Performance Report (TPR) described below.
- D. Technical Performance Report (TPR): The template for the TPR is available on the VETS website at: <http://www.dol.gov/vets/programs/common/main.htm> under VOPAR Forms. The TPR must be uploaded in the VOPAR system as a Microsoft Excel workbook. Use the applicable “Attach Narratives” link in VOPAR to select the grant, program year and quarter under which the TPR document should be uploaded. The name of the grantee, grant number, and total grant award amount must be included on the worksheet labeled “VOPAR Reporting.” The period of performance dates must reflect the program year dates covered plus the three quarters of follow-up.
- E. Technical Performance Narrative (TPN): The TPN must be uploaded into the VOPAR system. The first page of the narrative must include the grantee name, grant number, and the period covered by the report. The TPN must contain:
1. A comparison of actual quarterly and cumulative performance to established goals for the reporting period, and response to any findings related to monitoring efforts. This comparison will detail any discrepancies between planned goals and actual performance outcomes.
 2. A Corrective Action Plan (CAP) may be required if established goals have not been met. See Section VIII below for guidance related to a CAP.
 3. Other pertinent information, including a description of grant-related activities occurring during the reporting period. This may include personnel activity (hiring-training), community orientation/awareness activity, and programmatic activity (such as job development and job-driven training). The TPN should also identify administrative and

programmatic problems that may affect performance and proposed solutions.

4. The grantee must include a statement attesting to the completeness and accuracy of the quarterly reports submitted to the GOTR.

The 7th quarter (final) report must include an explanation of status of participants who were placed into employment during the grant period and were no longer employed at the end of the follow-up period.

F. Success Stories: Success stories must be uploaded into the VOPAR system as an attachment. The first page of the document must include the grantee name, grant number, and the period covered by the report.

G. Evidence of Compliance with the Quarterly Reporting Requirement: In order to be considered in compliance with the quarterly reporting requirement identified in Section VI.A, each grantee must complete the following steps by the date specified in that Section:

1. Upload the Technical Performance Report (TPR) in accordance with Section VII.D.;
2. Upload the Technical Performance Report Narrative (TPN) in accordance with Section VII.E.;
3. Submit complete and accurate Quarterly Performance and Expenditure Data, in accordance with Section VII.C.;
4. Submit and certify the FFR in GRS in accordance with Section VII.A.

Any grantee that has not completed all four of the above steps by the date specified in Section VI will be considered out of compliance with the quarterly reporting requirement and is subject to corrective action.

VIII. Corrective Action Plan (CAP): Grantees are accountable for meeting the fiscal and performance goals approved by the Grant Officer as well as all reporting requirements.

A. GOTRs may require a CAP for the following reasons:

1. Inaccurate or late reporting - Failure to submit accurate and complete fiscal and/or performance reports on or before the last day of the month after the end of the reporting quarter;
2. Non-Compliance Issues – Non-compliance with terms and conditions of the grant award to include failure to comply with fiscal goals pertinent to Uniform Administrative Requirements, Cost Principles, and Audit

Requirements (2 CFR Part 200) 29 CFR Part 95 and applicable Special Grant Provisions;

3. Poor Performance – Failure to meet one or more of the following critical performance outcomes in any quarter of the grant period:
 - a) **Enrollments** – the cumulative enrollments through the end of the reporting quarter divided by the cumulative enrollment goal through that quarter; *(If the percentage of actual enrollments is less than 85%, or greater than 115% of the planned enrollments, a CAP is required.)*
 - b) **Placements** – the cumulative placements through the end of the reporting quarter divided by the cumulative placement goal through that quarter; *(If the percentage of actual placements is less than 85%, or greater than 115% of the planned placements, a CAP is required.)*
 - c) **Placement Rate** – the cumulative placement rate through the reporting quarter divided by the cumulative placement rate goal through that quarter;
 - d) **Cost Per Placement (CPP)** – the cumulative cost per placement through the end of the reporting quarter divided by the cumulative cost per placement goal through that quarter. *(If the actual cost per placement is less than 85%, or greater than 115% of the planned cost per placement, a CAP is required.)*

The critical performance outcomes listed above will be evaluated for the purposes of a CAP. Grantees that are not achieving planned quarterly performance goals or planned cumulative goals per the above criteria should submit a CAP with the quarterly report.

- B. For grantees that do not submit the required CAP identifying actions to improve performance with the quarterly report, the following process will occur:
 1. Notification: If a CAP is required but has not been submitted with the quarterly report, the GOTR will notify the grantee, identifying the issue(s) and the need for the grantee to immediately submit a CAP. E-mail notification is acceptable.
 2. Submission: The grantee must upload the CAP in VOPAR with the quarterly report. The first page must include the grantee name, the grant number, and the grant year. An acceptable CAP must include:
 - a.) The critical goals that have not been met, or other issues (such as late or inaccurate reporting, and other non-compliance issues) that made the CAP necessary;
 - b.) An explanation of identified deviations in performance or other

issue(s);

- c.) Actions that will be taken to correct the issue(s), and/or performance;
 - d.) A timeline for implementation of the corrective actions; and
 - e.) A timeline for anticipated improved performance in the critical areas or resolution of other issue(s).
3. Acceptance: Once the CAP is drafted, the grantee will upload it into VOPAR. If the GOTR does not find the CAP to be acceptable, he/she will provide additional technical assistance and work with the grantee to develop an acceptable CAP. VETS will approve acceptable CAPs in VOPAR within 45 days after the end of the applicable federal reporting quarter.
4. Follow-up: The grantee must maintain frequent (at least monthly) contact with the GOTR, either in-person, by telephone, or by email, for assistance to review up-to-date financial and programmatic performance and grantee progress in resolving the issues identified in the CAP. If the issues necessitating the CAP are resolved, the GOTR will access VOPAR and annotate that the CAP has been successfully completed. The GOTR will also send a letter to the grantee informing them that the CAP has been successfully implemented.
5. Quarterly Review: Each quarter, the GOTR will review the grantee's performance criteria to identify those areas requiring a CAP. In the event that a grantee is already on a CAP for failing to meet performance criteria in a previous quarter, the GOTR will work with the grantee to perform one of the following actions:
- a.) If the grantee fails to meet one of the performance criteria that is not included in the existing CAP, a new CAP will be developed to address the performance criteria. This new document will be uploaded as a new CAP for the current quarter.
 - b.) If the grantee fails to meet the same performance criteria as the existing CAP, the existing CAP will be modified to reflect the second consecutive quarter the same performance measure was missed and any change in strategies to address performance. This modified document will be uploaded as a new CAP for the current quarter.
 - c.) If the grantee has sufficiently improved performance in some but not all areas included in the existing CAP, the existing CAP will be modified to remove areas where performance has improved and, to reflect any change in strategies to address the remaining deficient areas.

If grantee performance does not improve to an acceptable level, as defined in Section VIII, within two reporting quarters, or if the other issue(s) are not resolved, VETS staff will consult with the Grant Officer to determine if the grantee is High Risk. Grantees so designated run the risk of not being recommended for optional year funding or being unable to receive other Federal funding.

- IX. **Option Year Funding:** Should Congress appropriate funds for this purpose, VETS may consider option year funding in accordance with the grant provisions. VETS does not guarantee option year funding for any grantee. In deciding whether to exercise any option year funding, VETS will evaluate grantee performance during the previous period of operations as follows:

The grantee must meet, at minimum, 85% of planned cumulative quarterly goals by the end of the second quarter of the current Program Year for:

- A. Enrollments;
- B. Placements;
- C. Placement Rate; and
- D. Cost per Placement

In addition to the above, VETS will also evaluate the following in determining optional year funding:

- A. Compliance with all terms identified in the SGA, the grant award document, and the General and Special Grant Provisions, as verified by the GOTR;
- B. Timely and accurate submission of all program and fiscal reports; and
- C. Performance that resulted in a CAP, at any time during the program year (PY), has been or is being fully addressed to the satisfaction of the GOTR.

- X. **Review Analysis and Recommendation:** Prior to submitting quarterly reports, the grantee will review and analyze all reports and related documents to ensure that they are complete and accurate. It is also highly recommended that grantees provide GOTRs with the FFR and all reporting documents for review PRIOR to submission to the GRS and VOPAR.

After the electronic submission of reports, the documents will be reviewed and approved by VETS. Upon notification that a report has been approved, grantees must submit a signed, hard copy of all documents to the Grant Officer at:

**Department of Labor
Procurement Services Center
200 Constitution Avenue NW, Room # S-2203
Washington, DC 20210
Attn: Cassandra Mitchell**

XI. Actions Required:

- A. Grantees are encouraged to meet with their GOTR to obtain technical assistance and training on the reporting process.
- B. Grantees will submit all electronic and hard copy reports in accordance with the due dates, file format, and file naming conventions described above.

XII. Inquiries: Grantees should refer questions to the appropriate GOTR.

XIII. Expiration Date: Until superseded or rescinded.