**Justification for Nonmaterial/Nonsubstantive Change**

The Consolidated Appropriations Act, 2021, signed on December 27, 2020, provided for an additional seven quarters during which recipients of the Jobs for Veterans State Grants (JVSG) may expend each fiscal year’s funding. This change from five quarters of funding availability to up to twelve quarters was retroactive to the Fiscal Year (FY) 2020 awards. Per 2 CFR §200.328, grant recipients submit financial reports on a quarterly basis until available funding has been exhausted. JVSG recipients submit financial reports using the VETS-402A (Quarterly) or VETS-402B (Cumulative) forms (Expenditure Detail Report; OMB Control Number 1293-0009).

The VETS-402 (both A and B versions) is a workbook that compiles each grant award’s expenditures from inception to completion, updated by the grant recipient on a quarterly basis. It allows for only five quarterly expenditure periods. To allow states to continue spending their JVSG funding (and submit financial reports) for more than five quarters per the Act, the VETS-402’s formatting must be adjusted to support the additional quarterly reports for up to twelve quarters.

The Department of Labor is submitting this non-material, non-substantive change request under OMB Control Number 1293-0009 to reflect the Consolidated Appropriations Act’s provision for up to twelve quarters of expenditure per grant. The additional quarters within the form will only be used by grant recipients that need more time to exhaust their funding. Recipients are not required to continue updating the form once their available funding has been exhausted.

Out of the 54 JVSG recipients, the Department estimates that 20 will update this form to submit an average of one additional quarterly report per year. Due to extreme COVID-related grant underexpenditures during FY 2020, however, the Department estimates for this year only that 36 recipients will submit an average of two additional quarterly reports.