Customized Apprenticeship Programming- Information Technology Grantee Handbook

FUNDING OPPORTUNITY NUMBER: *FOA-ETA 18-08*

ICCB
ILLINOIS COMMUNITY COLLEGE BOARD

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TABLE OF CONTENTS

This Grantee Handbook is presented in six sections. Each section contains pertinent information that you and your staff need to know regarding the goals and expectations for managing the Customized Apprenticeship Programming – Information Technology grant funded by the USDOL and administered by the ICCB.

Purpose

In July 2019, the Illinois Community College Board (ICCB) was awarded a U.S. Department of Labor Sector Strategies Grant. The ICCB applied on behalf of the community college system whereas ten participating colleges received funds under this grant. This grant will focus on expanding apprenticeship programming within Information Technology occupations. ICCB's grant project will be cited as the Customized Apprenticeship Programming in Information Technology grant (hereinafter CAP-IT).

ICCB Programmatic Grant Team

ICCB will provide administrative leadership on the CAP-IT Grant. Leadership and management of this grant will be conducted by ICCB staff. All questions regarding the scope of work, deliverables, professional development, and compliance of this grant should be directed to programmatic staff. These staff serve as content specialists and develop guidelines, criteria, and performance measures for individual funding opportunities, provide guidance throughout the grant's period of performance, and determine the suitability of any changes to previously approved scope of work, project work plans, and measures. To enhance grant outcomes, they also offer a wide array of program- specific technical assistance and training services.

ICCB will evaluate your organization's progress toward the goals specified in your Grant Agreement and assess the quality of the program and services, including identifying promising practices and providing additional technical assistance as needed to help you meet your goals. Technical assistance may include, but is not limited to, program design, service strategies, and other areas to enhance program performance. If your grant is experiencing challenges in achieving a specific outcome(s), we encourage you to reach out to a member of the grant team.

Grant Team	Contact Information
Jennifer Foster, Deputy Executive Director *Program Lead/ Liaison to Federal Office*	jennifer.foster@illinois.gov 217.785.0171
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ICCB Grant inquiries and reports:	ICCB.grantpayments@illinois.gov
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For ease of communication, the ICCB has set up a listserv and a grant-specific inbox.

Listserv: iccb.cap-it-grant@illinois.gov
This listserv will assist you in communicating with both ICCB and other colleges. We encourage the use of the listserv to share progress or ask questions to the ICCB that other colleges may want to know.

Program-Specific Inbox: iccb.itapprenticeshipgrant@illinois.gov
All questions, reporting and other documents due to the ICCB, unless otherwise specified, should be sent to this Inbox. All programmatic and fiscal staff have access to this inbox and allows for a quick response.

Role of Other Partners:

CompTIA- World's largest IT industry association
- Utilize IT research and market intelligence to influence program development
- Determine national certifications including industry- recognized credentials and occupational standards
- Provide leadership in the IT profession
- Utilize membership and partnership networks for engagement and scaling efforts

Jobs for the Future- National non-profit leader in developing and expanding apprenticeships
- Center for Apprenticeship & Work-Based Learning
- National replication strategy and technical assistance
- Targeted outreach to employers and community colleges
- Diversity, equity, and outreach training
- Partnership development and coordination
- Convene consortium participants to disseminate project information and key findings
- Provide start-up coaching and technical assistance for multiple replication sites
- Development of 200 apprentices through national employer outreach

ICCB Professional Development Network (PDN)- Illinois Center for Specialized Professional Support
- Technical assistance for implementation of apprenticeships (colleges are informed/comply)

- Validate the quality of apprenticeship pathway
- Develop a Continuous Quality Improvement process
- Assist with the scaling/spreading efforts (identify practices that work, new potential partners, etc.)

Harper College
- Professional development and technical assistance for expanding apprenticeships to non-traditional industries
- Emphasizes innovative approaches to the delivery of apprenticeship programs for community colleges
- Options and solutions to manage/grow programs

Department of Commerce & Economic Opportunity (DCEO)
- Ensure consistency with WIOA Unified Plan
- Connect to business network and local workforce boards

Illinois Department of Employment Security (IDES)
- Provide labor market data, short and long-term projections, for the Illinois' workforce
- Linking qualified job seekers to CAP-IT program
- Support the learning agenda of this initiative by participating in discussions to identify and spread models that work, and engage in policy improvement discussions

Illinois Department of Human Services (IDHS)
- Assist participants with basic needs (child care, housing, food, medical, disability services, etc.)
- Support the learning agenda of this initiative by participating in discussions to identify and spread models that work, and engage in policy improvement discussions

Illinois Workforce Innovation Board (IWIB)
- Utilize Apprenticeship Committee
- Apprenticeship work plan, including promotion and marketing efforts
- Ensure collaboration with various Career Pathway Initiatives
- Ensure consistency with WIOA
- Integrated Business Services Framework

Local Workforce Boards
- Provide employment information
- Connect participants to local social services
- Market apprenticeship opportunities
- Connect small and medium-sized businesses to the project

Illinois Department of Veterans' Affairs (IDVA)
- Assist veterans in navigating services
- Assist veterans with identification of skills gaps and training required for civilian positions
- Assist veterans with obtaining prior learning assessment (PLA) for their military training

Young Invincibles- non-profit - expand economic opportunity for young adults
- Provide support services for participants
- Provide Apprenticeship Consultants educate and train employers on best practices and inclusion strategies

One Million Degrees
- providing comprehensive supports to low-income, highly motivated community college students
- Mentoring and coaching support
- Provide personal, profession, academic, and financial support to qualifying participants

Safer Foundation
- Career pathway development for people with records
- Provide employment and re-entry services to citizens returning to their communities

Women Employed-A voice for working women
- Provide tools for women to expand educational and employment opportunities

A. PROGRAM REQUIREMENTS

1 – Five Hallmarks of Quality Apprenticeship Programs

All apprenticeship programs funded through the grant must support recognized standards of high-quality apprenticeship programs. The five hallmarks of program quality to which all such apprenticeship programs must adhere are as follows:

1) Paid, Work-Based Component
Apprenticeship programs must pay apprentices at least the applicable Federal, state, or local minimum wage or a Federally-approved stipend under Federal wage requirements if otherwise applicable, and must describe wage progression requirements. Additionally, programs must address how they will provide apprentices the opportunity to gain upward mobility in the industry.

2) OJT Training and Mentorship
An important aspect of apprenticeship programs is offering apprentices the opportunity to apply what they are learning to their work through well-designed and highly structured work experiences. While they are learning on the job, programs should provide mentors to support apprentices and provide guidance on an industry or company culture, and industry or workplace policies and procedures.

3) Educational and Instructional Component
Apprenticeship programs must provide or arrange for classroom or related instruction that is high-quality and adequate to help apprentices achieve their proficiency goals or earn credentials or certifications. As an important indication of quality, programs must be designed to ensure that apprentices receive college credit for classroom or related instruction.

4) Industry-Recognized Credentials Earned
Upon completion of the apprenticeship program, apprentices must earn industry-recognized credential(s). The credential(s) must be portable, and applicants must identify all of the portability benefits in the application. In sectors in which generally accepted credentials already exist, or will be issued by industry organizations or credentialing bodies, applicants must describe whether program completion will result in one or more of these existing credentials or qualify an apprentice to sit for relevant credentialing exams. In sectors where independent credentials exist and are not issued by the apprenticeship program, the program must describe the alternative credential that apprentices may earn.
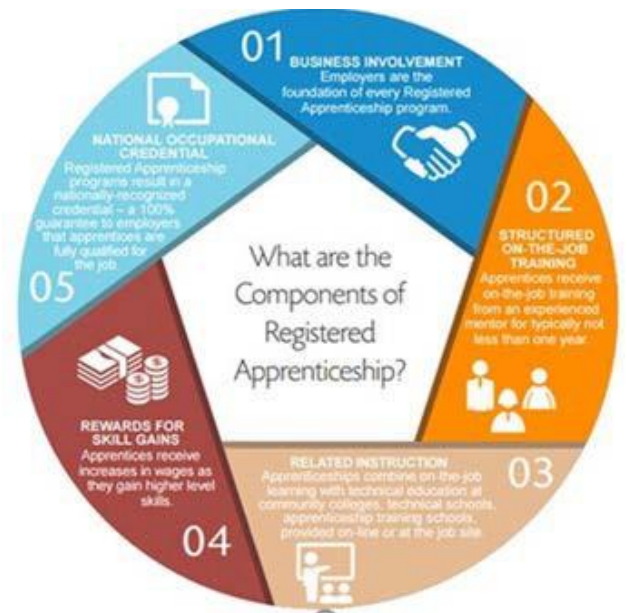
5) Safety, Supervision, and Equal Employment Opportunity
Apprenticeship programs must have policies and procedures in place to ensure a safe working environment that adheres to all applicable Federal, state, and local safety, employment, and equal opportunity laws and regulations.

2- Apprenticeship Models in Illinois

Registered Apprenticeship: An apprenticeship registered with the U.S. Department of Labor meeting the standards defined by USDOL, which includes the five required components: 1) Business Involvement; 2) Structured On-the-Job Training; 3) Related Instruction; 4) Rewards for Skill Gains; and 5) Industry Credentials.

Non-Registered Apprenticeship: An apprenticeship that is not registered with the U.S. Department of Labor, but that meets all Registered Apprenticeship criteria other than application for registration.

Pre-Apprenticeship: A program that has a documented partnership with an employer and is designed to prepare individuals to enter and succeed in a Registered Apprenticeship or Non-Registered Apprenticeship which includes **all** of the following:
- Training and curriculum that aligns with the skill needs of employers in the economy of the State or region and that has been designed to prepare participants to meet the minimum entry-level requirements of the Apprenticeship.
- Access to educational and career counseling, and other supportive services as needed by participants.
- Hands-on meaningful learning activities that are connected to education and training activities, such as Career Exploration and Career Development Experiences, and that reinforce foundational professional skills including, at a minimum, those outlined in the Essential Employability Skills framework.
- Upon successful completion of the program, participants are supported to apply for a Registered Apprenticeship or Non-Registered Apprenticeship program, and may receive preference for enrollment.

3- Use of Funds- Apprenticeship Activities

Grantees may use grant funds to support the following activities for **establishing new** apprenticeships:
- Engaging employers in developing standardized or centralized training (such as online programs delivered by an education provider or trade association) to train mentors and trainers who may be experts in their craft, but have limited experience teaching it to others and mentoring novice workers;
- Developing competency-based apprenticeship standards for a particular industry sector that include, at a minimum, the provision of industry-recognized credentials;
- Developing educational resources and training materials that could be used by community colleges, training providers, trade associations or companies to facilitate high-quality and consistent related technical instruction (RTI) – thus addressing one of the most significant barriers to apprenticeship program development. ETA encourages grantees to leverage existing resources by adapting the Trade Adjustment Assistance Community College and Career Training (TAACCCT) grantee resources and materials to align with sector-based

standards, and to engage successful TAACCCT grantees in sector-based expansion efforts;

- Developing occupational standards that document the level of skill, education, and knowledge required in a range of occupations to achieve an apprenticeship credential;
- Conducting outreach to a range of small- and medium-sized businesses to expand apprenticeship broadly within an industry sector. Beyond training materials and models, businesses can receive technical assistance to deploy apprenticeship training;
- Establishing third-party review of apprenticeship standards, educational materials, curriculum standards, and OJT standards to determine college credit equivalency through organizations such as the National College Credit Recommendation Service or American Council on Education; and
- Developing a process or system for reviewing, approving, and collecting data from apprenticeship programs to assess the quality of the training standards, materials, and programs.

Applicants may use grant funds to **expand existing apprenticeship programs** for the following activities:

- Revamping existing curricula to meet the needs of employer partners; and
- Tailoring apprenticeship training activities for online or virtual application to meet the needs of apprentices.

Other Allowable Activities that Support the Expansion of Apprenticeship Opportunities:

- Development of outreach and promotion to support increased awareness of apprenticeships for employers, potential apprentices (particularly veterans, military spouses, transitioning service members, and underrepresented populations), educators, the general public, etc.;
- Development of career awareness materials;
- Recruitment of eligible apprentices;
- Program design and implementation costs, such as the development of curricula and standards of apprenticeship, or costs associated with the development of competency-based apprenticeship training or other accelerated learning models;
- Hiring/developing qualified instructors and subject matter experts (including the costs of salaries and benefits) to assist in the delivery of new curricula;
- Use of subject matter experts from industry, apprenticeship, education, or other areas to assist in updating, replicating, or customizing existing industry-recognized curricula to support RTI;
- Development of articulation agreements with universities and other educational partners that allow for recognition of apprenticeship training toward college credit;
- Conducting prior learning assessments to determine the number of college credits that can be awarded for apprentices who receive their apprenticeship certificate of completion;
- Conducting assessments to determine skill levels, aptitudes, abilities, and competencies of apprentices.

4 – Uses of Funds - On-the-Job Training (OJT)

Grant funds may be used to subsidize the training and education costs for apprentices enrolled in programs that utilize a third-party education provider to implement sector-based programs. This would include reimbursing employers for some of the extraordinary costs of OJT. The following restrictions apply:

- Grantees may use grant funds to reimburse a portion of the apprentice's wages for small employers (those with 50 or fewer employees who often need the greatest assistance to participate in apprenticeship programs).
- For those businesses that have more than 50 employees, grant funds may not be used to reimburse OJT costs; however, grantees may count these OJT costs as matching funds.
- The OJT contract must not be with an employer who has previously exhibited a pattern of failing to provide OJT to apprentices with continued long-term employment with wages, benefits, and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are doing the same type of work. The OJT contract must be limited to the period of time required for an apprentice to become proficient in the occupation for which the training is being provided. Funds provided to employers for OJT must not be used to directly or indirectly assist, promote, or deter union organizing.
- Participant placements may only occur in private for-profit and nonprofit sectors (i.e., the grant does not allow for public sector placements);
- No placement may be made in staffing agencies providing workers on a temporary basis to employers for which the agency receives compensation from an employer; and
- The period of reimbursement should be of an adequate length to ensure the participant has acquired the technical skills needed for employment, but no longer than 12 months. Individuals may not be co-enrolled in other ETA programs for the purpose of extending OJT beyond 12 months. Grantees may establish contracts that will be longer than 12 months for multiple participants; however, the reimbursement for each individual that participates in OJT cannot be longer than 12 months.

5- Use of Funds- Related Technical Instruction (RTI)

Grant funds may be used to support the RTI (sometimes referred to as "classroom training") of an apprenticeship. RTI allows apprentices to learn the theoretical aspects of the job. Allowable costs may include:
- the development of courses at the post-secondary level that are integrated into the apprenticeship program,
- apprentice tuition or other educational fees,
- the delivery of instruction requirements, and
- the translation of military training, skills, and experience into the apprenticeship program.

The instruction may be competency-based education and training programs designed to give apprentices credit for skills already developed and allowing apprentices to move through coursework based on the mastery of a set of skills; and/or online course work, or distance learning modules, that build work-based skills and competencies.

6 – Use of Funds - Incumbent Worker Training

Grant funds may be used to train incumbent workers. Apprenticeship programs offer employers a viable strategy for upskilling their incumbent workers. Such training increases the skills and credentials for these workers to advance in their careers and assists employers in strengthening the skills of their existing workforce. Applicants that propose to serve incumbent workers must work with employer(s) and employer partners to develop apprenticeship programs designed to fill existing or projected job vacancies in middle- to high-skilled positions.

7- Use of Funds - Pre-Apprenticeship Training

Pre-apprenticeship services and programs are designed to prepare a diverse pool of individuals to enter and succeed in apprenticeship by providing career-specific training and readiness skills needed on the job. In addition to providing preparatory skills for future apprentices, pre-apprenticeship training can be an effective vehicle to streamline the recruitment process and help move job-ready apprentices into apprenticeship. The most effective pre-apprenticeship programs are those which utilize employers or other program sponsors to articulate eligibility requirements and qualifications that lead to hiring into an apprenticeship.

8 – Use of Funds - Supportive Services

Grant funds may be used to provide supportive services for training apprentices. Supportive services are those necessary to enable an individual to participate in education and training activities funded through this grant program. Examples of such services may include transportation, childcare, dependent care, housing, and needs-related payments. Grantees may fund supportive services through various means, including, but not limited to, providing the actual supportive service (e.g., childcare).

Grantees may use up to 10 percent of grant funds to provide supportive services to individuals who are participating in education and training activities provided through the grant. Under the Scaling Apprenticeship grants, supportive services for training apprentices include services such as transportation, childcare, dependent care, housing, and needs-related payments that are necessary to enable an individual to participate in education and training activities funded through this grant. Grantees may provide supportive services in various ways, including, but not limited to, providing the supportive service itself (e.g., childcare); providing apprentices with a voucher for the service (e.g., public transportation cards or tokens); or providing a stipend directly to the apprentice. Where stipends for supportive services are provided, the stipend amount must be for costs of a specific supportive service (e.g., childcare), rather than simply based on an unidentified need.

Grantees may use grant funds, up to the percentage to provide supportive services only:
1) to individuals who are participating in education and training activities provided through the grant,
2) when participants are unable to obtain such services through other programs, and
3) when such services are necessary to enable individuals to participate in education and training activities under the grant.

Grantees may establish limits on the provision of supportive services or provide their sub-recipients with the authority to establish such limits, including a maximum amount of funding and maximum length of time for supportive services to be available to apprentices. Additionally, grantees are encouraged to leverage other sources of funding for supportive services, including through co-enrollment in Workforce Investment and Opportunity Act (WIOA).

9 – Unallowable Costs

Grant funds may not be used for several reasons or in several manners:
1) "Incentives" for students or employers are not allowed.
2) Memberships for general purposes are not allowed. If it is conjunction with a group related to the grant, then it is possible to be allowed.
3) Two (2) or more people can not be listed on the same line item on a budget for either salaries or fringe benefits.
4) Multiple people on the same line in salaries or fringe benefits.

10 - Program Match

MATCH MUST BE REPORTED QUARTERLY.
All grantees are required to provide and expend cash (funds committed specifically to support this grant project, not prior investments), in-kind or third party resources equivalent to exactly 35 percent of the grant award amount as "matching" funds. All matching funds or contributions
must be expended on allowable grant activities and in accordance with the cost principles outlined in the Uniform Guidance at 2 CFR 200. Match can be in the form of cash, in-kind contributions and third-party contributions and must meet the requirement found at 2 CFR 200.306, 2 CFR 200.403, 2 CFR 200.434, and 2 CFR 2900.8. 2 CFR 2900.8 requires that match is recognized at the time in which the funds are expended. In other words, proposed matching funds (revenue or contribution) are recognized when expended on grant activities and valued at the amount expended (not received).

For sound and consistent reporting and valuation of match and leverage resources, it is best practice for the grant recipient to have policies and procedures explaining the process. During the grant period of performance and close-out, you will need to provide source documentation and accounting records to show what revenue stream or fund source was used to pay for the expenses incurred related to the matching funds. This may be through a chart of accounts and financial statements such as a Revenue and Expense statement or Project Status report. If the required match is not met, applicants will be responsible for reimbursing ETA the amount of unmet match when the grant is closed. Match must be expended as required at CFR 2900.8 before it can be recognized and reported as match on the ETA-9130 report.

Recipient share is the total amount of non-Federal funds (match) required during the period of performance of the grant to support the objectives of the award as part of a requirement for matching. **Leveraged resources** is a category of expenditures that benefit the Federal project but are not charged to the DOL-ETA grant. These resources are contributions by the grantee that are used for allowable activities under the grant, but are not a requirement of the Federal award. Leveraged resources are not defined in regulation or any related administrative requirements. For ETA programs, the term-leveraged resources refer to all resources used by the grant recipient to support grant activity and outcomes, whether or not those resources meet the standards required for match. To be allowable as part of match, an expenditure must be an allowable charge for Federal grant funds and considered necessary and reasonable to accomplish the project or program objectives. DOL will make determinations of allowable costs in accordance with the applicable Federal Cost Principles.

Examples
Both matching and leveraged resources can come from a variety of sources, including, but not limited to: the private sector (e.g., businesses or industry associations); the investor community (e.g., angel networks or economic development entities); the philanthropic community (e.g., foundations); and the non-profit sector (e.g., community organizations, faith-based organizations, or education and training institutions). Non-Federal, public sector funds (e.g., from States or local governments) may be used for matching funds, if necessary.

For match based on **participants served**, the calculation should be:
 participants enrolled x cost of training/class/session per participant per year x commitment years of the commitment = total

Example: XYZ Community College is committing 10 slots per year in a computer programming class. The match commitment letter must read: 10 slots x $500 per slot x 2 years = $10,000

For match based on **staff time**, the calculation should be: hours per year (or percentage of FTE) x hourly rate (or annual salary) x years of commitment = total commitment

Example: Applicant is committing Executive Director for 20 percent of the FTE over the life of the grant. The match commitment letter must read: 20 percent x $75,000 per year x 3 years = $45,000

For match based on **a set resource**, the calculation should be: monthly rate x months per year x years of commitment = total commitment

Example: ABC Organization is committing office space for the program. The match commitment letter must read: 800 square feet x $2.00/sq. ft. x 12 months x 3 years = $57,600.

Please see 2 CFR 200.306 for additional information on how to calculate the contribution of services and property.

Paid Release Time for Incumbent Workers
The portion of an incumbent worker's salary paid while the worker is participating in the related technical instruction component of the apprenticeship program (i.e., employee paid release time) may be counted as match under these grants. Fringe benefits and other personnel benefits cannot be counted as match. For employer partners (or subrecipients), these funds may be counted as cash match.

The valuation process of in-kind match includes determining the fair market value of an expenditure at the time of donation, appraising donated space and buildings, and determining the value of personnel services. The value of personnel services will depend, in part, on the staff person's role on the grant relative to their role in the overall organization. Calculations must be clear and able to be replicated by reviewers. During the period of performance, the grantee must meet the supporting documentation requirements of matching as specified in 2 CFR 200.306. DOL recognizes match at the time it is expended, as specified in 2 CFR 2900.8, and not when it is earned or received.

11 - Participant Eligibility

The intent of this grant is to provide apprenticeship training and services to individuals that will gain the skills and competencies required to enter middle- and high-skilled jobs along a career pathway in a variety of H-1B industries and occupations. This program will train individuals who are unemployed and seeking entry or reentry into the workforce, underemployed workers, and incumbent workers who need to increase their skills to remain competitive. Individuals **must be 17 or older and not currently enrolled in school** within a local educational agency (high school). Training must result in advancement of an individual's skills along a career pathway into middle- and high-skilled occupations.

The following definitions apply:
1. **Unemployed workers**: An unemployed worker is an individual who is without a job, is seeking employment, and is available to work.
2. **Incumbent workers**: This term refers to individuals who are employed but need training to upgrade their skills to secure full-time employment, advance in their careers, or retain their current occupations in H-1B occupations and industries. Incumbent workers are workers who typically are employed in lower-skilled, lower-wage, front-line, and/or entry-level positions, and where attaining new skills and competencies could help advance them into middle- and high-skilled jobs with their current employer. This definition includes newly hired workers and workers whose hours have been reduced and/or earnings have declined. The training provided to incumbent workers is developed with an employer or employer association.

3. **Underemployed workers**: This term refers to individuals who are not currently connected to a full-time job commensurate with the individual's level of education, skills, or wage and/or salary earned previously, or who have obtained only episodic, short-term, or part-time employment. To facilitate the inclusion of less-skilled and disadvantaged workers, applicants may serve individuals who are lower skilled, without the necessary skills and competencies to be in middle- and high- skilled jobs, as long as the program provides the skills necessary for individuals to enter a middle- to high-skilled job, or a job along a career pathway in H-1B industries or occupations, upon completion of an apprenticeship program. The apprenticeship program must include components that will assist those who do not have particular educational prerequisites and/or experience.

Illinois-specific Target Populations: Among the individuals eligible to receive apprenticeship training, those of particular interest include low-skilled adults, veterans, military spouses, transitioning service members, individuals with disabilities, and formerly incarcerated. Grantees are also strongly encouraged to include individuals who are not traditionally represented in apprenticeship programs and H-1B industries, including women and people of color.

12 - Co-Enrollment of Participants

Per H-1B policy, participants in one H-1B grant may not be co-enrolled in any other H-1B grant program. Please note, however, that co-enrollment of H-1B participants with programs funded under WIOA is encouraged, as long as participants meet the eligibility requirements for both programs.

13 - Veterans' Priority for Participants

38 U.S.C. 4215 requires grantees to provide priority of 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 DOL. The regulations implementing this priority of service are at 20 CFR Part 1010. In circumstances where a grant 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 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. Grantees must comply with DOL guidance on veterans' priority. ETA's Training and Employment Guidance Letter (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 https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2816.

14 - Requirement to Provide Certain Information in Public Communications (Steven's Amendment)

Pursuant to P.L. 115-141, 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:

- The percentage of the total costs of the program or project, which will be financed with Federal money;
- The dollar amount of Federal funds for the project or program; and
- 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 part are separate from those in the Uniform Guidance and, when appropriate, both must be complied with.

Sample Statement:
This project was funded [65%] in the amount of [$200,000] pursuant to a grant from the Illinois Community College Board through U.S. Department of Labor's FOA-ETA 18-08. X Company and Y Company provided matching funds of [$100,000] supporting 35% of the project.

15 - Partnership Requirements

Grantees are expected to coordinate services with the larger public workforce system (e.g., local workforce development boards, American Job Centers (AJC), and/or local, municipal, or state agencies). We encourage you to engage the system in one or more of the following ways:
   a. Identifying, assessing, and referring candidates for training;
   b. Connecting trainees/workers with employers;
   c. Providing supportive services for qualified individuals, where appropriate;
   d. Leverage AJC resources such as Labor Market Information (LMI), employer contacts, co-enrollment; and
   e. Where applicable, collaborate with AJC in the provision of Registered Apprenticeships

You are also encouraged to reach out to other stakeholders in your local area. Stakeholders may include the employer community, industry associations, educational institutions, community-based organizations, foundations, and apprenticeship programs.

The exact roles of grant partners vary depending on the project strategy and the needs of your participants. As a general rule, it is beneficial to revisit your Grant Agreement and engage key partners already identified and included in your statement of work and outline their activities early in the grant implementation process, so that next steps may be established for the success of the grant. You are also encouraged to identify and leverage additional partnerships in your community and local workforce investment area. Participants may face a wide range of challenges that are best addressed through multiple strategies and through collaboration with a wide variety of partners, requiring extra time for planning and implementation. See **Table 1 – Key Partner Responsibilities below** for some additional responsibilities that key partners can provide.

Responsibility	Workforce Agencies	Educational Institutions & Agencies	Economic Development Agencies	Human Services Agencies	Community-Based Organizations	Employers
Assess skills	•			•	•	
Assist with financial aid		•				
Assist with tuition and fees	•			•	•	•
Create a job friendly business environment			•			
Create links between credit and non-credit programs		•				
Develop curriculum		•			•	•
Develop curriculum with multiple entrances/exits and "modularized" (chunked) sections		•			•	•
Deliver training		•			•	•
Design programs		•			•	•
Engage employers	•	•	•	•	•	
Expand export opportunities			•			
Fund innovation			•			
Identify industry-recognized credentials	•	•		•	•	
Identify skill sets						•
Promote portability and flexibility		•				
Provide academic and personal counseling		•				
Provide career and personal counseling	•			•	•	
Provide case management	•				•	•
Provide credit for prior learning		•				
Provide employment						•
Provide incentives for business expansion			•			
Provide incentives to train incumbent workers			•			
Provide job placement assistance	•	•			•	•
Provide job retention services	•				•	
Provide job search assistance	•				•	
Provide labor market information	•		•			
Provide professional development opportunities	•	•		•	•	
Provide support services	•	•			•	•
Provide system navigation	•				•	
Provide trainers/faculty		•				•
Provide training facilities & equipment	•					•
Provide work-based learning opportunities						•
Recruit and make referrals	•			•	•	
Recruit new business development			•			

Table 1: Key Partner Responsibilities

Planning Phase

Grantees that have a preliminary phase of grant implementation (three months to one year, depending on your particular grant program) must take the necessary steps to ensure that your grant has the necessary support structure in place to achieve successful outcomes. Proper preparation includes making sure that the following issues are fully addressed prior to implementation:

Program Staffing and Support: recruiting and hiring the key staff members who will be responsible for managing and implementing your grant program;

Facilities and Resources: obtaining the training space, equipment, and other key resources, such as supplies and worksite agreements, that you will need to carry out your SOW;

Partner Engagement: developing and operationalizing relationships and partnerships establishing next steps with your local workforce development boards, employer partners, and other training collaborators that will allow you to provide necessary services to participants;

Data Management: confirming that the management information system you intend to use for data collection, analysis, and reporting is fully developed and operational, if not being provided to you;

Policy and Guidance: becoming familiar with all of the Federal policies and program specific guidance related to your award.

Program Development and Implementation Phase

This phase of the grant period of performance represents the heart of each grant award, as it is during this period that grant-funded programs and services are launched and delivered, and the viability of each grant initiative is truly tested. ETA's primary expectations of you as a grant recipient during this time period are that:

    f.   Any protocols and processes that support the grant-funded program activities and related financial transactions are already in place;

    g.   You are deeply familiar with your timeline for expected milestones and deliverables, as detailed in the application and proposed in your scope of work; and

    h.   You have developed and begun to implement your strategies for achieving your proposed project milestones and deliverables. For example, if you have received grant funding to carry out a project in which the main components involve career-oriented education and

training activities, you will be expected to use this program development and implementation phase to fully execute your strategies regarding:

    i. Participant outreach and recruitment;
    ii. Assessments and enrollment;
    iii. Development of Individualized Service Strategy or Individualized Employment Plan;
    iv. Education and training (classroom and non-classroom related);
    v. Job placement and employment;
    vi. Individual case management and follow up support services to enhance participant hiring and retention; and
    vii. Collaboration with and leveraging of partner resources to enhance achievement and success of grant deliverables.

Reporting Grant Progress and Accomplishments

To document the work completed and the outcomes achieved as a result of ETA/ICCB funding, ICCB requires regular submission of progress reports throughout the grant's period of performance. The frequency of reporting is either dictated by project guidelines or prescribed by grant program regulations. Your organization is required to submit quarterly financial and programmatic reports. These reports are due no later than 30 calendar days after the end of each quarter.

SFY2021-2023 *(see grant agreement for report dates for SFY2020)*

Quarter	Quarter Start Date	Quarter End Date	Report Submission Due Date
1	July 1	September 30	**October 30**
2	October 1	December 31	**January 30**
3	January 1	March 31	**April 30**
4	April 1	June 30	**July 30**

Performance Reporting

Grantees are required to submit, on a quarterly basis, one report that is inclusive of narrative, performance, and financial that track performance throughout the entire lifetime of the grant. These include:

1. A **narrative report** detailing key milestones and achievements attained during each given reporting quarter along with descriptions of any challenges encountered; and
2. A **performance report** comprised of data related to a number of performance targets and measurements specifically designed to align with your grant's SOW and individual performance objectives. Categories of data recorded in your quantitative reports might include data fields such as:
   - Total grant participants served;
   - Total participants beginning and completing education/training activities;
   - Total number of credentials attained by participants; and
   - Total number of participants who secured and/or retained employment.
3. A **financial report**.

A Final Performance Report is due no later than 45 days after the end of the grant period of performance. This report must provide both quarterly and cumulative information on the grant activities. It must summarize project activities, employment outcomes, and other deliverables, related results, and must thoroughly document the training or labor market information approaches that you used.

Records Retention

Grantees must follow Federal guidelines on record retention, which require that financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a specific period of time. This is three years, either from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. To view the Federal regulations, including related exceptions to the required time frame for retaining records, visit 2 CFR 200.333.

The Value of Performance and Outcomes Reporting

Systematic and frequent reporting of performance metrics allows ETA to assess and measure performance across grantees and across individual grant initiatives, which both permit ETA to keep key political stakeholders informed about the positive workforce outcomes resulting from ETA's strategic investments and allow it to readily identify and implement needed improvements in the administration and delivery of its grant initiatives. Meanwhile, from a grantee perspective, the ability to track performance so closely throughout the grant's life cycle either verifies that your

grant is moving in a positive direction to meet the needs of participants and key stakeholders appropriately or allows you to identify the necessary corrective measures to improve the likelihood of success during the remainder of the grant's period of performance.

Beyond the short-term benefits of goal alignment and enhanced prospects for success in your individual grant, the practice of frequent performance reporting offers additional dividends in terms of longer-term project resilience and sustainability. By accumulating such fine-tuned information on the grant's performance and outcomes, you can help your organization strengthen and expand its workforce development strategies as follows:

- Demonstrate the positive outcomes of the grant activities to investors and partners to help ensure sustainability of the project and partnerships;
- Illustrate the return on investment of the grant to employer partners, which is an important factor in maintaining existing, and securing new, partnerships and resources; and
- Use collected data to adopt a model of continuous improvement in your management and implementation of grants by establishing a regular practice of identifying barriers to success, soliciting feedback from partners and participants, and implementing corrective measures as needed to ensure that the grant is best meeting stakeholder needs.

SECTION 4

GRANT AND BUDGET MODIFICATIONS

Grant and Budget Modifications

Grantees are allowed to make modifications up to ten percent (10%) or $1,000 (whichever is higher) of any specific line, prior to seeking approval. Modifications that are greater than ten percent (10%) or $1,000 (whichever is higher) of any specific line OR require a major change in scope, require the submission of a budget modification request. All requests regarding budget modifications should be submitted to: iccb.itapprenticeshipgrant@illinois.gov.

SECTION 5

EVALUATION - WHAT DO I NEED TO KNOW AS A GRANTEE?

To enhance the likelihood that funded projects will identify effective workforce education and training strategies and models that can be replicated broadly throughout the country, ETA places a high priority on evaluating programs and strategies it funds. Evaluation helps us to document and learn from the innovative strategies grantees implement, to assess whether projected goals are met, and to learn about program implementation and effectiveness including the extent to which they yield positive labor force outcomes. This objective evaluation subsequently helps inform future program direction and funding decisions. DOL uses grant dollars not only to support innovative programmatic strategies, but also to learn from them so we can build knowledge about what works and ultimately to improve outcomes for those our grants serve. Therefore, as part of this effort, ETA may require all or some portion of grantees to participate in a comprehensive and rigorous evaluation (refer to your program's FOA for program-specific evaluation requirements). This affects grantees in the following respects:

- By accepting grant funds from ETA, you have implicitly agreed, as a condition of the award, to participate in an evaluation by DOL, should your organization be selected for that purpose. Such evaluations may be carried out by an independent external evaluator selected by DOL. As a condition of accepting DOL grant funds, grant partner organizations must agree to participate in any evaluation that DOL undertakes.

- Throughout the period of performance, you may be required to maintain and share with the designated evaluators or relevant DOL personnel all collected data records, such as data on participants, employers, funding, and outcomes. Records about enrollment and training courses must be maintained at a participant level.

- Where appropriate, you must also maintain personally identifiable participant information in secure conditions. DOL reserves the right to make publicly available the aggregate level results of the program evaluation and supporting aggregate data.

SECTION 6

GENERAL PARAMETERS GOVERNING THE USE OF ETA

ETA grantees are responsible for adhering to a number of Regulations on the use of grant funds, which range from restrictions that apply to only one individual grant program to those that apply to all grant recipients of Federal funds. This section is intended to clarify the nature and scope of allowable grant uses – and the types of restrictions that you can most frequently expect to encounter as a grant recipient of ETA funds – so that you are more fully equipped to plan your grant activities and budget in alignment with existing requirements.

The Office of Management and Budget (OMB) completed the rule making process to combine the OMB Cost Principles and Administrative Guidance into one regulation – the Uniform Guidance (UG). The UG is located at 2 CFR 200 with the exceptions for DOL at 2 CFR 2900. Listed below are links to helpful resources to help you better understand the requirements for operating a Federally funded grant.

- Uniform Guidance including technical corrections (01/2017) - 2 CFR Part 200

- DOL's Exceptions to the Uniform Guidance - 2 CFR Part 2900 - 2 CFR Part 2900

- Resources for Understanding the Uniform Guidance - https://cfo.gov/grants/uniform-guidance/

- DOL-ETA Grant Management Training Modules - https://grantsapplicationandmanagement.workforcegps.org/

- US DOL-ETA grants webpage and resources - http://www.doleta.gov/grants/resources.cfm

Cost Principles and Administrative Requirements (all ETA grantees)

Cost principles are a set of government-wide rules that apply to all ETA grantees, as outlined in 2 CFR 200 and 2 CFR 2900 that define the conditions under which educational institutions, non-profit organizations, and government agencies may charge costs within Federally-funded grants. (For- profit entities, foreign public entities, and foreign organizations must also follow these principles under DOL exception 2 CFR 2900.2.) These regulations provide guidance to help you determine whether specific planned, expenditures are allowable, unallowable, or allowable with conditions. The core foundation of these government cost principles is the "prudent person" rule, meaning that he/she would find the costs to be reasonable, necessary, and allocable (of direct benefit) to the grant. Furthermore, the allocation of expenditures that your organization charges against a Federally-funded grant must be consistent with the way that your organization allocates expenditures across all of your programs.

Uniform Administrative Requirements, as stated in 2 CFR 200 and codified by ETA regulations at 2 CFR 2900, set forth standards for obtaining consistency and uniformity across Federal agencies in the administration of grants and agreements with state and local governments, hospitals, higher educational institutions, and other non-profit organizations. Provisions are applied by Federal agencies to grant recipients, who in turn apply the provisions to subcontractors, subrecipients, and/or subgrants performing substantive work under their grants and agreements. Topics covered under Uniform Administrative Requirements include, but are not limited to:

- Financial Management;
- Cost Sharing;
- Property Standards;
- Procurement;
- Records Access and Retention;
- Award Termination and Enforcement; and
- Closeout Procedures.

Agency-Level Requirements

Program Regulations

Program regulations are crafted and adopted by Executive Agencies such as ETA to implement a Federal statute or amend information in an established rule. The process used by Executive Agencies to implement statutes or amend existing rules is generally referred to as "rulemaking" and typically involves a lengthy and transparent process of public review and comment. You can track upcoming and expected regulatory activities by consulting the list that ETA updates regularly throughout the year, found at: http://www.doleta.gov/reports/dpld_regulatory.cfm.

ETA Advisories

ETA uses its Advisory system to disseminate the Agency's interpretations of Federal laws, procedures, administrative requirements, and other relevant technical information to state workforce agencies, direct grant recipients, and other appropriate stakeholders. Advisories, searchable by year, may be viewed and downloaded from http://wdr.doleta.gov/directives/. You may also register here: https://public.govdelivery.com/accounts/USDOL/subscriber/new?pop=t to receive automatic updates via email specific to your grants and interests.

Of particular importance to grantees are the following types of advisory notices:

Training and Employment Guidance Letters (TEGLs) transmit policy and operational guidance. These have the force of regulation and must befollowed.

Training and Employment Notices (TENs) communicate announcements of meetings, publications, or general information. These are informational in nature.

Unemployment Insurance Program Letters (UIPLs) provide policy and technical guidance specific to the UI program.

APPENDIX A

RESOURCES

To assist you during grant implementation, USDOL ETA and ICCB have developed several toolkits and helpful resources. Other partner sites are also provided.

- ICCB CAP-IT Website: http://www2.iccb.org/cap-it/

- ICCB ICAPS/IET Website: https://www.icapsillinois.com/

- ILworknet Apprenticeship: https://www.illinoisworknet.com/ApprenticeshipIL/Pages/default.aspx

- JFF's Center for Apprenticeship and Work-based Learning:

  - https://center4apprenticeship.jff.org/

- Apprenticeship Toolkits
  - Resources to introduce you to apprenticeship along with its benefits for employers, workers, and the workforce system.
  - www.dol.gov/apprenticeship/toolkit.htm
  - www.doleta.gov/oa/employers/apprenticeship_toolkit.pdf

- Career Pathways Toolkits
  - Features key elements to help guide state and local teams develop a comprehensive career pathways system.
  - wdr.doleta.gov/directives/attach/TEN/TEN_17-15_Attachment_Acc.pdf
  - www.careerpathways.workforcegps.org/announcements/2016/ 02/05/14/21/T   he-Release-of-the-Career-Pathways-Toolkit-A-Guide-for-System- Development

- Sector Strategies Toolkit
  - To guide workforce organizations to more effectively operationalize sector strategies.
  - www.businessengagement.workforcegps.org/resources/2016/ 04/12/13/53/S ector-Strategies-Implementation-Framework

- Competency Model Clearinghouse
  - To assist users with the development of competency models and career ladder/lattices.
  - www.careeronestop.org/competencymodel

- Grants Management and Uniform Guidance Training
  - Contains more than 25 online training modules from ETA.
  - https://grantsapplicationandmanagement.workforcegps.org/